



July 7, 2025

Megan Hambrick
Program Manager
U.S. Preventive Services Task Force Program
Agency for Healthcare Research and Quality (AHRQ)
Department of Health and Human Services

RE: USPSTF CONSIDERATION OF MEDICAL NUTRITION THERAPY AS A PREVENTIVE SERVICE

Dear Ms. Hambrick and members and staff of the U.S. Preventive Services Task Force,

On behalf of the ATA Action Virtual Foodcare Coalition (the Coalition) I am writing to you today to first thank you for the thoughtful discussion your staff had with ATA Action and Coalition members on how virtual delivery of Medical Nutrition Therapy (MNT) may align with the USPSTF's mission of advancing evidence-based preventive care. I am also following up on this conversation with additional research in support of MNT as a preventive service. This designation is both evidence-based and critically needed to address the persistent and escalating burden of chronic conditions in the United States. MNT would align with your mission to improve health by making evidence-based recommendations about clinical preventive services and expand access to a proven, cost-effective intervention with the potential to transform population health outcomes.

Introduction to ATA Action and the Virtual Foodcare Coalition

ATA Action, the American Telemedicine Association's affiliated trade association focused on advocacy, advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports the enactment of state and federal telehealth coverage and fair payment policies to secure telehealth access for all Americans, including those in rural and underserved communities. ATA Action recognizes that telehealth and virtual care have the potential to truly transform the health care delivery system – by improving patient outcomes, enhancing safety and effectiveness of care, addressing health disparities, and reducing costs – if only allowed to flourish.

Last year, ATA Action adopted its Principles for Virtual Food Care, a clear framework for the integration of Virtual Foodcare delivery within the healthcare system via telehealth platforms and digital health tools. Recognizing that integrating nutrition services into virtual care models can have transformative impacts on health outcomes and reduce healthcare costs, ATA Action launched the Virtual Foodcare Coalition to support the enactment of state and federal telehealth policies that expand access to foodcare. It is ATA Action's position that Virtual Foodcare should ensure broad access and effectiveness by making expert nutritional advice widely accessible through innovative telehealth platforms.

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The Chronic Disease Crisis Facing U.S. Citizens

Chronic diseases are one of the greatest threats to American citizens today, with approximately six in 10 Americans living with at least one chronic disease, the leading cause of illness, death and disability in the United States.¹ Not only do chronic conditions present everyday challenges and serious long-term health risks for patients, treatment and care for these conditions can be incredibly expensive, for both patients and the nation's healthcare system as a whole.

Yet, access to preventive nutritional care remains alarmingly limited. Many individuals at risk for these conditions are not screened for dietary risk factors, and even fewer are referred to qualified nutrition professionals for early intervention. While current USPSTF recommendations address individual risk factors (such as screening for high blood pressure or prediabetes), they often do not consider an intervention strategy that could directly address the underlying cause: suboptimal nutrition. Expanding patient access to healthy food and dietary interventions will be essential in reducing the development of chronic conditions, a role that medical nutrition therapy can thrive in.

Medical Nutrition Therapy's Potential to Prevent the Development of Chronic Diseases

Medical Nutrition Therapy is defined by Cleveland Clinic as a form of treatment that uses nutrition education and behavioral counseling to prevent or manage a medical condition. MNT has proven to be very effective in managing and lessening the effects of diagnosed conditions, but its true potential is as a preventive service, delaying and even preventing the development of chronic conditions entirely.²

MNT is well established in helping to manage chronic conditions, with research highlighting MNT's positive benefits for patients with conditions such as obesity, diabetes and hypertension. While these benefits of MNT in chronic disease management are widely accepted, recent research has explored its potential to prevent these conditions entirely, or at the very least delay them significantly. The integration of virtual care into MNT has also shown promising results. A recently published study found that engagement with an MNT program and companion mobile app was associated with significant weight loss for overweight and obese adults.³

One of the conditions where MNT has the greatest preventive potential is diabetes. In 2023, there were a total of 374 million adults worldwide living with prediabetes, 70% of whom were

¹ The Growing Burden of Chronic Diseases, National Institute for Health Care Management Foundation, April 3, 2025. <https://nihcm.org/publications/the-growing-burden-of-chronic-diseases>

² Medical Nutrition Therapy, Cleveland Clinic. <https://my.clevelandclinic.org/health/treatments/medical-nutrition-therapy-mnt>

³ Hu E, Kelley T, Haryani A, The Impact of Technology-Enabled Medical Nutrition Therapy on Weight Loss in Adults With Overweight and Obesity: Retrospective Observational Study, JMIR Mhealth Uhealth 2025;13:e70228 URL: <https://mhealth.jmir.org/2025/1/e70228> DOI: 10.2196/70228.

projected to develop type 2 diabetes mellitus (T2DM) in their lifetime.⁴ An analysis of more than ten random control tests conducted over almost thirty years found that, “In adults with prediabetes, MNT was effective in improving glycemic outcomes, anthropometrics, blood pressure, and most lipid levels.”⁵

Professional societies and associations have also begun to recognize the importance of MNT in preventive care. For example, in 2023, the National Lipid Association published a clinical perspective on nutrition interventions for adults with dyslipidemia. The recommendations in this clinical perspective focused on nutrition interventions to address elevation of low-density lipoprotein cholesterol and/or triglyceride, key factors in reducing the risk of developing atherosclerotic cardiovascular disease.⁶ The Academy of Nutrition and Dietetics has also released an evidence-based practice guideline for “Medical Nutrition Therapy Interventions Provided by Dietitians for Adult Overweight and Obesity Management.”⁷ By using MNT interventions with overweight patients, before a diagnosis of obesity, the development of obesity and other accompanying chronic conditions may be prevented entirely.

Conclusion

For the reasons enumerated above, ATA Action believes that designating MNT as a preventive service aligns well with the USPSTF’s mission to improve the health of people nationwide. This designation also aligns with previous, comparable designations by the USPSTF regarding the provision of behavioral counseling to promote a healthy diet and physical activity for adults at increased risk of cardiovascular disease.⁸ While MNT would support behavioral counseling for adults at risk of cardiovascular disease, the potential of MNT as a preventive service goes well beyond cardiovascular disease and can be key in preventing other chronic conditions such as diabetes, hypertension, cancer, and dyslipidemia. Designation as a preventive service would be a

⁴ Josephine M. Dudzik, Katelyn E. Senkus, Alison B. Evert, Hollie A. Raynor, Mary Rozga, Deepa Handu, Lisa M. Moloney, The effectiveness of medical nutrition therapy provided by a dietitian in adults with prediabetes: a systematic review and meta-analysis, *The American Journal of Clinical Nutrition*, Volume 118, Issue 5, 2023, Pages 892-910, ISSN 0002-9165, <https://doi.org/10.1016/j.ajcnut.2023.08.022>.

⁵ Dudzik et al.

⁶ Kirkpatrick, C. F., Sikand, G., Petersen, K. S., Anderson, C. A. M., Aspry, K. E., Bolick, J. P., Kris-Etherton, P. M., & Maki, K. C. (2023). Nutrition interventions for adults with dyslipidemia: A Clinical Perspective from the National Lipid Association. *Journal of clinical lipidology*, 17(4), 428–451. <https://doi.org/10.1016/j.jacl.2023.05.099>

⁷ Medical Nutrition Therapy Interventions Provided by Dietitians for Adult Overweight and Obesity Management: An Academy of Nutrition and Dietetics Evidence-Based Practice Guideline, Morgan-Bathke, Maria et al. *Journal of the Academy of Nutrition and Dietetics*, Volume 123, Issue 3, 520 - 545.e10.

⁸ Healthy Diet and Physical Activity for Cardiovascular Disease Prevention in Adults With Cardiovascular Risk Factors: Behavioral Counseling Interventions, Final Recommendation Statement, November 24, 2020. <https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/healthy-diet-and-physical-activity-counseling-adults-with-high-risk-of-cvd#fullrecommendationstart>



crucial first step in expanding access to MNT and help to prevent patients from developing many life altering and expensive chronic conditions.

Thank you again for the opportunity to meet with you and to follow up with additional information. In order to improve patient health outcomes, expand access to MNT care, and promote a healthier population and healthcare system, ATA Action encourages the USPSTF to give thoughtful consideration to beginning the process of designating MNT as a preventive service. The Coalition looks forward to continuing to work with USPSTF and is happy to serve as a resource, however it may be beneficial. If you have any questions or would like to discuss the virtual foodcare industry's perspective further, please contact me at kzebley@ataaction.org.

Kind regards,

A handwritten signature in black ink, appearing to read "Kyle Zebley", with a stylized flourish at the end.

Kyle Zebley
Executive Director
ATA Action