



National Eating Disorders Association

June 9, 2003

Commissioner of Social Security
P.O. Box 17703
Baltimore, MD 21235-7703

Dear Sir:

Thank you for this opportunity to comment on the proposed revisions of the Social Security Disability criteria. We are writing concerning the language specific to eating disorders in both adults and children.

In regards to the criteria for eating disorders in adults, we would recommend that the criteria listings specify anorexia nervosa, bulimia nervosa, and eating disorder not otherwise specified (NOS). These are serious, well-documented disease specifications. Evaluation for disabilities associated with these diseases should be conducted by clinicians with demonstrated expertise in this area since diagnostic evaluation is often complicated. We would also argue that the evaluation of physical or medical status not be based solely on laboratory findings since the medical consequences of these disorders may not be apparent in standard lab assessment.

The current criteria for eating disorders in the pediatric population bundle eating disorders with a variety of other disorders, particularly somatoform and movement disorders. We would recommend that the new listings separate eating pathology from these other disorders. Eating disorders are increasingly prevalent in pediatric and adolescent populations and we believe that they require separate classification. The current criteria apply only to diagnoses of anorexia nervosa in this population despite our knowledge that many adolescent and child patients report histories of self-induced vomiting, laxative use, and use of appetite suppressants. We would recommend that the criteria also specify bulimia nervosa and anorexia nervosa-purging subtype in the new listings.

Sincerely,

Douglas Bunnell, PhD
Board President, National Eating Disorders Association