

ASSOCIATION OF STATE & TERRITORIAL
PUBLIC HEALTH  NUTRITION DIRECTORS

June 14, 2011

David Burr, Director
Program Accountability and Administration Division
Supplemental Nutrition Assistance Program
US Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302-1500

Dear Mr. Burr,

The Association of State and Territorial Public Health Nutrition Directors (ASTPHND) respectfully submits the following comments in response to USDA's informal request for comments about key programmatic provisions of paragraph (3) (A) of section 241 of the *Healthy, Hunger-Free Kids Act of 2010*, which outlines the new Nutrition Education and Obesity Prevention Grant Program. This program will reshape the Supplemental Nutrition Assistance Program – Nutrition Education (SNAP-Ed) efforts throughout the nation to more effectively address both hunger and obesity.

Our Association represents over 250 members in fifty states, the District of Columbia and five Territories. ASTPHND members include an extensive network of public health nutritionists working to improve the health of the American population through statewide and local community initiatives. We thank you for considering these comments.

The Institute of Medicine, the Centers for Disease Control and Prevention, the Let's Move campaign, and the 2010 Dietary Guidelines recommend comprehensive approaches. SNAP-Ed regulations mandating such an approach are consistent with current public health nutrition practices.

ASTPHND established principles to support recommendations the association made on the proposed Healthy, Hunger-Free Kids Act of 2010. These principles have been used to shape the comments ASTPHND is providing on the new Nutrition Education and Obesity Prevention Grant Program included in the final act as passed by Congress. These principles include:

- Maintaining USDA nutrition programs that are driven by the best and most current science on nutrition, physical activity and child development
- Supporting and enhancing nutrition education aspects of all programs
- Serving all women and children at risk for nutritional deficits related to food insecurity and/or health related conditions
- Supporting training for staff providing the services that are integral to nutrition education programs
- Providing funding to enable USDA nutrition programs to adequately meet the program-based demands

- Providing funding to keep USDA nutrition programs current with new technology
- Continuing improvement of USDA nutrition programs through research and evaluation

Hunger and obesity are two public health crises that cost billions of dollars in lost productivity and health care costs each year. The newly designed SNAP-Ed program can address these challenges by giving communities and states the opportunity to make policy, systems, and environmental changes that support healthy eating and active living.

ASTPHND encourages USDA to define “multilevel interventions at multiple complementary organizational and institutional levels” as comprehensive efforts that include policy, systems, and environmental change. These approaches will help transform low-income communities where the healthy choice will be both the easy and the expected choice.

Two approaches that have been widely and successfully used are the Spectrum of Prevention and the Social-Ecological Model (promoted in the 2010 Dietary Guidelines for Americans). Both models emphasize the relationships between individuals and the broader social and physical environment. ASTPHND urges USDA to adopt the full spectrum of approaches in the new Nutrition and Obesity Prevention Grant Program regulations, including individual, group and community education, marketing and promotion, and population-based public health approaches.

We recommend USDA include the following when writing the new SNAP-Ed regulations and guidance:

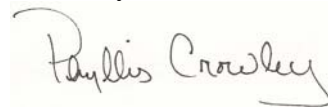
- Target SNAP-Ed funds to communities of greatest need including communities with high rates of poverty, hunger, poor nutrition, physical inactivity, and obesity. Ending Childhood Hunger by 2015 is an important goal for all USDA nutrition programs. Targeting to the areas of greatest need will help make this goal a reality throughout the country.
- Require comprehensive needs assessments and planning to lay the foundation for large-scale population-based interventions that address the persistent problems of poor nutrition, inadequate physical activity, and obesity. This could be done in collaboration with those needs assessments conducted by other federally-funded programs like the Title V Maternal and Child Health Block Grant.
- Discontinue the current rule prohibiting the use of SNAP-Ed funds for education about negative health effects of consuming certain foods and beverages and allow SNAP-Ed programs to use the 2010 Dietary Guidelines consumer messages, including *“Drink water instead of sugary drinks”*.
- Include provisions in SNAP-Ed guidance to allow use of media for “best reach” to target audiences. The electronic, print, outdoor and social media selected should provide access to the largest numbers of the low-income target audience in each media market and/or be the most cost-efficient based on cost per thousand (CPM) to reach the target audience. These expanded criteria will allow programs to support on-the-ground community programs service a larger number of the eligible population, and be evaluated based on cost efficiency in reaching the target audience.

- Allow funds to be used to improve access to healthy food and physical activity through community development and consumer empowerment approaches. Encourage SNAP-Ed providers to participate in community food security coalitions and efforts to enhance the built environment at the state and local levels.
- Maximize coordination with other nutrition and obesity programs to strengthen school-wellness policies, expand the reach of nutrition education messages provided to families, and close the gaps in services within communities. Examples include coordinating activities through programs funded by the Centers for Disease Control and Prevention, the HRSA, Title V Maternal and Child Health Block Grant, non-profit organizations and foundation-led initiatives, WIC, Child and Adult Care Food Program, Food Distribution Program on Indian Reservations, Safe Routes to Schools, and other obesity-prevention programs.
- Ensure evaluation of nutrition education as well as marketing and promotion, policy, systems, and environmental change efforts.
- Recommend SNAP-Ed coordination with other nationally-recognized efforts for obesity prevention and position SNAP-Ed providers to lead *Let's Move!* initiatives targeting low-income communities.
- Reduce the paperwork burden by means such as eliminating prior approval requirements for income-eligible service sites, streamlining documentation and weekly time records, and instituting multi-year state plans.

ASTPHND recognizes that it is time to move beyond the long history of the Food Stamp Program providing families with a safety net from hunger to SNAP ensuring a solid foundation for better health among America's most vulnerable low-income citizens. SNAP-Ed can play an important role by working with other partners to promote healthy behaviors while simultaneously helping low-income consumers to increase their access to healthy foods and more places to be physically active in all communities.

Again, thank you for this opportunity to provide comments.

Sincerely,



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