



June 14, 2011

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

Dear Director Burr,

Thank you for the opportunity to provide comments to key programmatic provisions to Section 241 of the Healthy, Hunger Free Kids Act (S3307) which outlines the new Nutrition Education and Obesity Prevention Grant Program. Alameda County Department of Health has been a local provider of SNAP-Ed in California since 2000, and we are very excited about potential changes to SNAP-Ed to improve our current interventions and more effectively use these resources.

While our educational efforts have proven to increase awareness and knowledge, nutrition education alone will not change the buying and eating practices of many families in our county who live in neighborhoods without grocery outlets that sell healthy food options, but instead rely on convenience stores and fast food outlets. What has proven effective in changing practices, is a collaborative and comprehensive approach that combines education, policy, environmental and systems changes. It's not enough to provide the education of why fruits and vegetables are important to good health; we need to work to change the environment to increase availability of healthy foods. That includes working with schools to ensure fruits and vegetables are on the menu and working with nearby stores to ensure that healthy snacks are sold and promoted and working with city governments to ensure that incentives are available to entice full service grocery stores to these neighborhoods to improve families' ability to purchase fruits and vegetables.

The CDC in their FOA for American Recovery and Reinvestment Act of 2009, *Communities Putting Prevention to Work* selected 5 evidence based interventions centered on Media, Access, Point of Decision Information, Price, and Social Support Services. This comprehensive approach should also be allowed by SNAP-Ed regulations. In addition, with the newly defined focus on obesity prevention, this approach should be taken for physical activity interventions as well. Given the important role of exercise in the energy balance equation, physical activity interventions need to be allowed as a stand alone, not as a sideline that can only be incorporated if nutrition education is the main focus.

A public health approach uses multilevel systems to minimize community harms and prevention strategies are directed to groups rather than individuals. Many health departments have organized their work based on two comprehensive approaches, the **Spectrum of Prevention** and the **Socio Ecological Model**. One example of this model of complementary multilevel intervention is our Soda Free Summer Campaign. This well evaluated social marketing campaign included both earned and unearned media, and touched all levels of the spectrum: interactive educational materials and

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curriculum supported individual practices, community partners instituted programmatic and organizational policies, and local governments passed proclamations and ordinances. It should be noted that this campaign was not conducted with SNAP-Ed funds, as current rules do not allow interventions that disparage foods. If we are serious about turning around this obesity epidemic, messages need to be specific and crystal clear and we urge USDA to develop rules that allow communities to engage in work that explains which foods and beverages when consumed regularly contribute to obesity and permits communities to pursue systems and policy change that limit the availability of these products.

In our county, low income residents are disproportionately affected by obesity and many related chronic diseases. Yet current targeting rules prohibit us from reaching all of this population. As in many urban areas, census tracts are comprised of residents with great variances in income levels. It is not uncommon to have subsidized low-income housing one or two blocks from multi-million dollar homes. Many low-income service sites (including public housing, food pantry and WIC clinic sites) are located in census tracts with less than 50% of residents 185% of Federal Poverty Level. We need to be able to penetrate these multi layered pockets.

Therefore, our strong recommendations are that USDA develops SNAP- Ed regulations that:

1. **Require** a comprehensive, multi-leveled, socio-ecological model of intervention.
2. **Allow** agencies to educate communities as to dangers of over consumption of certain foods and beverages, especially as they contribute to obesity
3. **Permit** communities to pursue systems and policy change that promotes healthy eating and physical activity
4. **Expand** the “messaging area” to broader targeting of communities to encompass the larger geographic (air space) that reaches the largest proportion of SNAP participants and SNAP eligible’s where people live, work and shop.

Thank you for your consideration.

Sincerely,



Diane Woloshin  
Director, Nutrition Services  
Alameda County Public Health Dept.

