

June 13 , 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,

We are writing 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. We appreciate the opportunity to comment prior to the publication of proposed regulations. We are particularly eager to comment because we believe the changes Congress made to the SNAP Nutrition Education program will allow states to more effectively use these vital resources to better serve SNAP eligible individuals.

The **Center for Nutrition and Activity Promotion (CNAP)** is a California State University, Chico Research Foundation center providing nutrition and health promotion services to over 300,000 residents in a 12 county rural and underserved region representing 35% of the California land mass. Rates of food stamp participation, overweight, and weight related health conditions are worse than state and national averages.

CNAP provides services to low-income populations in eleven north state counties and currently receives funding for nutrition education (SNAP-Ed) and food stamp outreach (SNAP-Outreach) from the USDA and *Network for a Healthy California*. Through our SNAP-Ed and SNAP-Outreach funding, we have formed a consortium made up of 21 community agencies, four county departments of public health, five county offices of education, four county departments of social services, four tribal governments, and 21 low resource school districts (serving 154 school sites) throughout the north state region. Together, CNAP and our consortium partners provide high-quality nutrition education and physical activity promotion to thousands of low-income children and adults each year.

Hunger and obesity are two public health crises that cost California millions of dollars in lost productivity and health care costs each year. The newly designed SNAP-Ed program can address these challenges simultaneously by giving California communities the opportunity to make policy and system changes that will allow SNAP-Ed-eligible Californians to make the healthier food and physical activity choices that are important for their families. This opportunity will be possible only if USDA issues regulations and guidance based on public health practices and proven public health successes, including those in obesity prevention.

History and research have proven that comprehensive efforts that include a variety of approaches – policy, systems and organizational change – in all places that Americans live, work, learn and play are essential for changes in behavior.

- CNAP research demonstrates that broad spectrum school and community based changes result in significant increases in fruit and vegetable consumption (Voorhees et al, JNEB, 2011).
- There is an extensive body of evidence which indicates that comprehensive approaches to obesity prevention are effective.<sup>1</sup> Changing neighborhoods, workplaces, schools and parks will make the healthy choice the default. A 2006 study, for example, found that Californians who live in neighborhoods with a prevalence of fast food restaurants and convenience stores are at significantly higher risk for diabetes and obesity.<sup>2</sup> Nutrition education alone will not change the buying practices of Californians who live in such neighborhoods.

We therefore urge USDA to define “multilevel interventions at multiple complementary organizational and institutional levels” as comprehensive efforts that include policy, systems and environmental change, as discussed above.

We understand that USDA is also interested in receiving comments about sound public health approaches to issues involved with SNAP-Ed. Two approaches, the Spectrum of Prevention and the Social-Ecological Model (promoted in the 2010 Dietary Guidelines for Americans), have been widely and successfully utilized in California. Both models emphasize the relationships between individuals and the broader social and physical environment and promote environmental, organizational, and policy change strategies as important tools for improving communities and neighborhoods so the healthy choices are the norm or the default. We urge USDA to require that SNAP-Ed programs utilize one of these approaches. Defining public health approaches in this way will allow SNAP-Ed programs across the country to duplicate, when and where applicable, environmental strategies that have a proven track record of success.

The Institute of Medicine, the Centers for Disease Control and Prevention, the First Lady’s *Let’s Move* Campaign, and the 2010 Dietary Guidelines all recommend comprehensive approaches. SNAP-Ed regulations mandating such an approach would be consistent with current public health practices.

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<sup>1</sup> Hill JO, Peters JC. Environmental contributions to the obesity epidemic. *Science* 1998;280:1371--4. Sallis JF, Glanz K. The role of built environments in physical activity, eating, and obesity in childhood. *Future Child* 2006;16:89--108. Sallis JF, Glanz K. Physical activity and food environments: solutions to the obesity epidemic. *The Millbank Quarterly* 2009;87:123—54. Institute of Medicine. *Local Government Actions to Prevent Childhood Obesity*. September 2009. National Academies Press: Washington, DC. Institute of Medicine. *Preventing Childhood Obesity: Health in the Balance*. 2005. Nation Academies Press: Washington, DC.

<sup>2</sup> *Designed for Disease: The Link Between Local Food Environments and Obesity and Diabetes*. California Center for Public Health Advocacy, PolicyLink, and the UCLA Center for Health Policy Research. April 2008.

In addition to providing input on definitions, we have a few additional recommendations. We recommend USDA include the following points when writing the new SNAP-Ed regulations and guidance.

Target SNAP-Ed funds to communities of greatest need, i.e., communities with high rates of poverty, hunger and obesity;

- Support the involvement of the SNAP-Ed community by requiring local coalitions with low-income membership as a condition of grant;
- Allow addressing physical activity as an issue separate from food intake;
- Allow the inclusion of “eat less” messages in nutrition education;
- Discourage consumption of sugar sweetened beverages;
- Require implementing agencies to award some of the funds based on a competitive process that would consider factors such as readiness and proven success and define local governments, public health, universities, and non-profits as eligible entities to apply for such funds;
- Require evaluation of nutrition education and policy and environmental change;
- Provide incentives for the production, distribution, and procurement of local food;
- Improve availability of mechanisms for purchasing foods from local farms.

We have two final recommendations. While we urge USDA to require targeting of SNAP-Ed funds, we strongly recommend that targeting not be so specific that community-wide initiatives would not be funded. It would be a tragedy – and poor public health practice -- to exclude strategies that would benefit SNAP-Ed recipients only because they also benefit Individuals whose income makes them ineligible for SNAP-Ed.

Secondly, we strongly urge USDA to discontinue its current rule prohibiting the use of SNAP-Ed funds for education about the negative health effects of consuming certain foods and beverages proven to be detrimental to good health when consumed regularly. Instead 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 such products.

Thank you for considering these recommendations.

Sincerely,

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