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David Burr, Director  
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U.S. Department of Agriculture  
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Dear Mr. Burr,

We are writing in response to the U. S. Department of Agriculture's (USDA) request for comments about key programmatic provisions of Section 241 of the *Healthy, Hunger-Free Kids Act of 2010*, which outlines the creation of a Nutrition Education and Obesity Prevention Grant Program. The Iowa Nutrition Network (INN) is housed in the Iowa Department of Public Health (IDPH). The Iowa Food Assistance Program contracts with two implementing agencies in Iowa - INN and Iowa State University Extension - to deliver community-based nutrition education programs to SNAP-Ed eligible audiences. The following comments reflect the experiences and opinions of staff from the INN.

The Iowa Department of Public Health is dedicated to providing programs that reduce health disparities and reach people before healthcare is needed. Increased personal responsibility (healthy food and activity choices) and a greater societal commitment to removing obstacles faced by low-income families are needed if SNAP participants are to lead healthier lives. Under the new grant structure, SNAP-Ed is no longer driven by state cost-share and allows SNAP to both increase short-term access to healthy foods and invest in healthy eating and physical activity habits that could last a lifetime.

**Targeting barriers:** The current SNAP-Ed targeting guidance is overly restrictive and unrealistic for many states. According to a recent analysis of national census data conducted by the Healthy Hawaii Initiative Evaluation Team<sup>1</sup>, census-tract targeting allows just 18 states to reach more than 25% of their SNAP-Ed eligible (185% federal poverty level) population through community-based or social marketing campaigns located in qualifying census tracts. States in the northern half of the United States, including Iowa, are disproportionately unable to conduct community-based, social marketing activities using the current SNAP-Ed qualifying census tract guidelines. This barrier drives implementing agencies towards funding more costly and lower-reach, individual-based direct education interventions, and does not provide low-income families with the social or environmental support that is needed for long-term behavior change. More flexible targeting rules are needed by states like Iowa that have growing, urban concentrations of poverty and dispersed rural communities with families that struggle in multi-generational poverty.

**Recommendations:**

1. For 2013 allow states to introduce targeting plans to reach the largest proportion of SNAP participants and eligibles where they live, work and shop for food rather than focusing on who should not be

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<sup>1</sup> A report of this analysis was submitted by the Hawaii Nutrition Education Network as part of the comment process. A copy of the report can be obtained from Tina Tamai, Network Coordinator, at the Hawaii Department of Public Health. [tina.tamai@doh.hawaii.gov](mailto:tina.tamai@doh.hawaii.gov)

reached. This would allow states to introduce layered, local and state data maps that could be used for effective targeting of SNAP-Education activities. State SNAP agencies are well-positioned to determine if a targeting plan has substantial reach and reasonable strategies.

2. USDA should consult with stakeholders and other federal agencies to identify useful, practical sources of data that expand the reach of SNAP-Education eligible populations. Continue to target populations with incomes at or below 185% of the federal poverty level in order to achieve long-lasting population impact and conduct economies of scale with low-income audiences
3. Consider sharing SNAP and WIC sales data with state implementing agencies on an as-needed basis. Currently agencies know which grocery stores meet the threshold of \$50,000 in SNAP benefits; however, knowing if the amount is \$50,000 or \$200,000 would allow agencies to invest point-of-purchase education more effectively.
4. A more flexible targeting structure in SNAP-Education guidance will allow implementing agencies to invest in social marketing models and environmental supports for low-income families and individuals who want to be more physically active and eat healthier foods. For example:
  - a. In rural Iowa there may be a garden plot in the center of town near the county courthouse that would have high visibility to all community residents and would be near a low-income elementary school. The center of town may not be in a qualifying census tract and would not be considered allowable as an education site.
  - b. There may be one road coming in and out of a rural town from the interstate. A billboard with nutrition education messages would be seen by nearly everyone in the small town, including everyone who was SNAP-eligible; however the location of the billboard is not located in a qualifying census tract and it does not meet the requirement that 50% or more of everyone who sees the board is SNAP-eligible.
  - c. In an urban setting, buses that carry a large number of SNAP-eligible individuals could not be used for educational bus signs because the route of the bus goes outside of qualifying census tracts.

States are not asking to do anything they want, but implementing agencies and state partners need more flexibility to use reasonable, commercial -marketing approaches, and target interventions to the needs of local communities. The Hawaii Nutrition Network has proposed combining data on food insecurity and the number - not just the percentage - of individuals below 185% of the federal poverty level within a geographic location, with the geographic concentration of agencies and organizations reaching a high percentage of individuals who are likely to be SNAP-Education eligible. This would enable them to target resources where they are likely to generate the greatest benefit for the SNAP-eligible populations in their state.

**Public health approaches:** With technical assistance from USDA in the 1990's, the Iowa Nutrition Network built their nutrition education program on a social marketing foundation. This created many opportunities for cross-program messaging and collaboration. INN has strong, collaborative relationships with health promotion programs in the department such as the Iowa WIC Program and the CDC-funded obesity prevention program – Iowans Fit for Life; the Older Americans Act Nutrition Program at the Iowa Department on Aging; and Team Nutrition and School Meals Program at the Iowa Department of Education.

**Recommendations:**

1. SNAP-Education should encourage social marketing and other public health approaches to enhance public/private partnerships and support USDA's strategic goals to improve access to healthy food and foster cross-program, cross-agency collaboration. Program guidance should accurately reflect social marketing principles, methods and professional practice. The field of social marketing has grown considerably since the 1990's and the Guidance needs to reflect current best-practices.
2. Consult with social marketing experts to revise the OMB-approved performance measure for social marketing. (ratio of reach)

3. USDA should offer technical assistance and Web-based training on public health approaches - including social marketing - and how to design state-level programs around public health frameworks such as the socio-ecological model. CDC's Division of Nutrition, Physical Activity, and Obesity has already offered to include SNAP-Ed implementing agencies in their technical assistance calls related to obesity prevention.
4. IDPH is appreciative of the financial resources and social marketing expertise that SNAP-Ed has provided or developed over the last 15 years. We could implement more public health approaches – especially to prevent obesity - if SNAP-Ed guidance was more flexible.
  - INN would like to consider the feasibility of serving low-income, SNAP populations through the creation of mobile food pantries and farmers markets; engaging empowerment programs for leaders and parents in low-income neighborhoods to advocate for healthy communities, community walkability assessments, and promotion of safe routes to school; and helping low-income schools meet the standards of USDA's Healthier U.S. School Challenge.
  - USDA should clarify their position on supporting policy initiatives that are relevant to SNAP-Ed populations. Staff from SNAP-Ed implementing agencies should be allowed to provide staff support or cooperate with a sister agency working on health-promotion policies that support low-income families. It is unfortunate that some state agencies have not been willing to participate in policy initiatives or conduct education events with community stakeholders out of fear that they would be non-compliant with SNAP-Ed policy
  - USDA should encourage state-level projects that leverage resources from both SNAP-Ed and SNAP Outreach.
  - Encourage states to partner with their state's Department on Aging. This is a cost-effective way to reach the underserved SNAP audience of low-income, older adults – a growing population that is highly motivated to maintain their independence with good nutrition and active lifestyles. If the SNAP staff at USDA's Food and Nutrition Service have not had the opportunity to discuss potential collaboration with nutrition staff from the Administration on Aging, it would be beneficial to states if this was accomplished before new program regulations are released.
  - If nutrition education programming is to fully align with the 2010 Dietary Guidelines, SNAP-Ed implementing agencies must not only encourage consumption of healthy foods, but also encourage participants to eat less of certain foods without fear that such strategies will be unallowable.
  - Engaging SNAP-Ed participants in physical activity, not just talking about it, will allow nutrition educators to more fully support the Dietary Guidelines and the First Lady's *Let's Move* initiative. State and local policies that support greater physical activity in low-communities are also needed.
  - USDA is currently working on important policy interventions such as those related to restaurant menu labeling. It would be exciting to see the relevant food access and environment policy expertise applied to SNAP-Ed. Work with CDC, RWJ Foundation or other organizations to develop guidance to states on areas USDA feels are most important for policy work.
  - Encourage staffs from SNAP offices and SNAP-Ed implementing agencies to participate in food policy councils, state-specific initiatives by governors, hunger-awareness projects, etc., to focus more resources and attention on SNAP-eligible, income-disparate populations.

**Program Administration:** USDA is aware of states' concerns regarding the administrative burden of this program. Even without the match requirement, it will not be easy to create an effective, flexible, nutrition education and obesity prevention program that fits comfortably with the policies and rules needed to manage the distribution and use of individual SNAP benefits.

**Recommendations:**

1. Clarify how states should estimate administrative and direct delivery costs - without requiring additional, cumbersome time records – so that the ratio of SNAP-Ed administrative costs to SNAP-Ed delivery costs is calculated more uniformly across the country.
2. Allow a more flexible set of targeting rules to significantly reduce the administrative burden; eligibility waivers should not require income-based data verification for every potential delivery site.
3. Allow multi-year plans. This would enable states to plan more efficiently and direct funds to longitudinal evaluation. States should not be required to submit entire new plans each year, but should focus on proposed changes for nutrition education activities and SNAP-Ed grant budget.
4. Consider approval of shared costs for projects that enable implementing agencies to participate with state-level partners without cumbersome calculations based on pro-rating rules.
5. Clarify whether SNAP-Ed funds can be used to pay for reasonable program evaluation costs such as financial incentives to schools that are assigned to control/comparison and intervention sites. Rigorous evaluation is encouraged in SNAP-Ed guidance but there is confusion about allowable costs that are considered by some to be related to research and therefore unallowable.
6. Provide technical assistance to regional office staff on program evaluation and public health approaches. In turn, allow and encourage regional staff to provide technical assistance to states, not just oversight.
7. Establish a national, evaluation consultation group for SNAP-Ed.
8. Allow states to obtain training in obesity prevention and program evaluation by attending conferences and workshops. There needs to be an expectation of high quality outputs from SNAP-Ed implementing agencies in order to ensure the best outcomes for USDA's investment.

The Iowa Nutrition Network staff has appreciated working with USDA over the years and looks forward to seeing colleagues at the annual meeting of the Association of State Nutrition Network Administrators (ASNNA). We see great potential for the new grant structure and would appreciate having the proposed regulations and program guidance as soon as possible. The grant structure will require a focused, well-designed competitive application that must be posted for community applicants early in 2012.

Questions about these comments should be addressed to Doris Montgomery, state coordinator for the Iowa Nutrition Network. [Doris.montgomery@idph.iowa.gov](mailto:Doris.montgomery@idph.iowa.gov)