

Takashi Wada, MD, MPH Director & Health Officer
Michele Mickiewicz, MPH Deputy Director
Anne M. Fearon Deputy Director
Suzanne Jacobson, CPA Chief Financial Officer
Elizabeth Snyder, Deputy Director
Peter Hasler, MD Medical Director

Scott McCann, PhD, LCSW
Director of Health Education
345 Camino Del Remedio #332 ♦ Santa Barbara, CA 93110
805/681-5270 ♦ FAX 805/681-5436
Scott.mccann@sbcphd.org

June 3, 2011

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

Dear Mr. Burr,

I am writing in response to the U.S. Department of Agriculture's (USDA) request for comments about key programmatic provisions of the *Healthy, Hunger-Free Kids Act of 2010*, which outlines the Nutrition Education and Obesity Prevention Grant Program. I appreciate the opportunity to comment and believe the changes to be made to the Supplemental Nutrition Assistance Program Nutrition Education (SNAP-Ed) program will allow states to better serve low-income individuals.

With proper regulatory guidance, the newly revamped SNAP-Ed program will be well-positioned to address two public health challenges: hunger and obesity. The SNAP-Ed program can address these problems simultaneously by giving states and communities the opportunity to make policy and system changes enabling beneficiaries to make healthier food and physical activity choices. The USDA can facilitate this opportunity by issuing regulations based on promising public health practices and policies, including those in obesity prevention.

Research demonstrates that multifaceted approaches work best to change behavior. These efforts include policy, systems, and environmental changes aimed at reaching Americans through a variety of venues and activities. The First Lady's *Let's Move* Campaign, the *2010 Dietary Guidelines*, the Institute of Medicine (IOM), Centers for Disease Control and Prevention (CDC), and Leadership for Healthy Communities (LHC) have all developed evidence and practice-based recommendations and guidance on approaches to address obesity at the community level. SNAP-Ed regulations requiring such approaches would be consistent with current public health practices.

Other areas we urge USDA to include in future guidance include:

- Target SNAP-Ed funds to communities of greatest need rather than to individuals with high need
- Allow funds to be used to improve access to healthy food *and* physical activity
- Discontinue the current guidance that prohibits the use of these funds for education about the negative health effects of consuming certain foods. We urge USDA to develop guidance that aligns with the *2010 Dietary Guidelines*, which specifically refer to "food and food components

to reduce." Nutrition educators must be free to explain that regular consumption of certain foods and beverages can contribute to obesity and other nutrition-related health problems

- Support collaboration among state staff including efforts among cooperative extension, state nutrition networks and other non-profits with similar missions
- Ensure that agencies administering the funding make awards based on a competitive process that would consider factors such as readiness and proven success, and that defines local governments, public health organizations, universities, and non-profits as eligible entities to apply for such funds
- Ensure that evaluation of nutrition education, policy, and environmental changes is integrated into initiatives

Thank you for considering these recommendations.

Sincerely,

Scott McCann, PhD
Director of Health Education