



Ukiah Unified School District

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Lois J. Nash, Ed.D.
Superintendent

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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,

Ukiah Unified School District and Mendocino County Office of Education 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. Our Mendocino County Schools have been Local Incentive Project Awardees (LIA's) under the SNAP-Ed funding for the past 12 years. We have a proven track record as to behavior changes among our student and parent population, as shown on our Impact/Outcome Evaluation results for the past three years.

Our comments are as follows:

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

- There is an extensive body of evidence which indicates that comprehensive approaches to obesity prevention are effective. 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.¹ 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 well as nutrition education, as discussed above.

The 2010 *Dietary Guidelines for Americans* point out that "Individuals and families make choices every day about what they will eat and drink and how physically active they will be. Today, Americans must make these choices within the context of an environment that promotes overconsumption of calories and discourages physical activity. This environment and the individual choices made within it have contributed to dramatic increases in the rates of overweight and obesity. Poor health outcomes, such as cardio-vascular disease, type 2 diabetes, and some types of cancer also have increased in tandem. To reverse these trends, a coordinated system-wide approach is needed—an approach that engages all sectors of society, including individuals and families, educators, communities and organizations, health professionals, small and large businesses, and policymakers. *Everyone has a role in the movement to make America*

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healthy. By working together through policies, programs, and partnerships, we can improve the health of the current generation and take responsibility for giving future generations a better chance to lead healthy and productive lives.” (USDA, USDHHS: *Dietary Guidelines for Americans, 2010*; page 55)

2. 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 well as nutrition education 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.

Under the Social Ecological model, we need to include **“eat less” messages and craft such messages in terms understood by our priority population**. Given the title of this grant program, obesity prevention is clearly among its goals. We will not be successful in reducing the prevalence or incidence of obesity with “eat more of these foods” messages alone – we must call upon the science which has clearly documented that weight gain occurs when more calories are consumed than burned, and weight loss only occurs when more calories are burned than consumed. By focusing exclusively on “eat more of these foods” and couching any messages related to eating less in terms such as “choose energy dense foods more often” rather than “cut back on junk food”, we are disingenuously promoting higher calorie consumption rather than lower. Likewise, we need to be able to address physical activity as an issue separate from food intake. While it often makes sense to address both issues in a single context, this isn’t always the case; states should be given the flexibility of developing messages and interventions that take this into account. The *2010 Dietary Guidelines for Americans* discuss the need for increasing time spent in physical activity and the need to decrease some foods and food components; addressing these two issues in NEOP programming should be explicitly encouraged and allowed.

3. 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 funds to be used to improve access to healthy food *and* physical activity;
- 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, school districts/county office of education, and non-profits as eligible entities to apply for such funds.
- Require evaluation of nutrition education and policy and environmental change.

4. 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.

5. 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.

We can only address the causes of obesity successfully if we discourage the consumption of foods and beverages that are low in nutrients and high in calories. If we only encourage eating healthy foods like fruits and vegetables and never discourage the consumption of foods or beverages (like soda), we are actually promoting obesity. USDA's rule that SNAP-Ed funds cannot be used to disparage any food or beverage gives the public a sense that USDA is more concerned about influential industries rather than science and research which suggest ways to address obesity and the serious chronic conditions that stem from obesity that disproportionately affect the SNAP-ED and other vulnerable populations. We urge USDA to remove this prohibition at the earliest opportunity. The example of soda and other sugary drinks – which research now strongly suggests is one of the largest drivers of increased calorie consumption today as contrasted to 30 years ago – is evidence enough for USDA to make this change. Protecting industries in lieu of funding states and communities to educate low income Americans about what science now tells us is simply not good public policy. Continuing this practice, rather than funding states and communities to fight the obesity epidemic with all proven strategies may convey a sense that USDA is more interested in the soda industry's bottom line rather than the public's health. We trust this is not the case. We urge USDA to make this change when it releases proposed SNAP-Ed regulations.

6. A few other recommendations and/or definitions include:

“Nutrition education.” Nutrition education should be defined as “any combination of educational strategies, accompanied by environmental supports, designed to facilitate the voluntary adoption of food choices and other food- and nutrition-related behaviors conducive to health and well-being; nutrition education is delivered through multiple venues and involves activities at the individual, community and policy levels.” (Contento. *Nutrition Education: Linking Research, Theory, and Practice*. 2007. Jones and Bartlett, Publishers)

Schools are the best way to reach SNAP-Ed population. Of the 9,627 school sites in California, 5,861 (60%) schools have 50% of more students that meet the SNAP-Ed criteria. Schools are:

- the hub of the community
- conveniently located—relatively close to the homes of the students attending that school
- able to access children and parents multiple times (evidence has shown people need repeated exposure to a message to be effective)
 - can be “touched” by teachers, administrators, school nurses, child nutrition staff, other staff, school publications, school events and meetings.
- Respected by/familiar to families; feel safer with schools than other government agencies.
- Able to provide more than just nutrition messages; students can learn the skills to make healthy choices
 - Evidence that supports the value of skill-building
 - Monrovia
 - CA State University, Chico

Schools can:

- build the capacity of parents to reach other parents.
- build the capacity of students to reach their peers.
- design *specific* nutrition interventions (policies, environmental changes and education) to meet the needs of the people for a *particular* community.

“Obesity prevention.” Implementing agencies should be required to use public health approaches (e.g., comprehensive, multi-level interventions at multiple levels) to reducing and preventing obesity through this funding. “Meaningful [obesity prevention] efforts must include the development of ... policies and programs that address both the ‘energy in’ and ‘energy out’ components of weight maintenance.” (Jacobsen and Nestle, “Halting the Obesity Epidemic”, *Public Health Reports*, Jan/Feb 2000, Vol. 115)

“Significant low income population.” NEOP funding should aim first to reach SNAP participants and those who are eligible but not participating in SNAP and/or free and reduced priced child nutrition programs. Rules related to targeting

should enable reaching the largest proportion of SNAP participants and SNAP eligibles where they live, work, and shop for food as cost effectively as possible rather than focusing on who should not be reached. An example of targeting rules gone amok is the attempt to utilize public buses in social marketing campaigns. Although they are a cost effective way to reach our target audience, messaging placards in buses have often been denied based on the fact that a given bus route does not run exclusively through eligible census tracts. Included in the definition of "low income" should be census tracts where 50% or more of the resident population is at or below 200% of the FPL in order to reach the largest number of SNAP households.

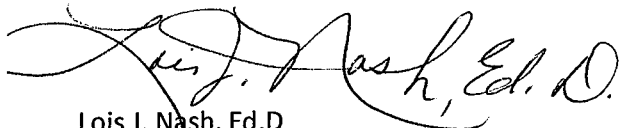
"State agency." We believe that achieving the goal of "voluntary adoption of food choices consistent with the Dietary Guidelines for Americans" is more likely to happen when state and local organizations work together to undertake comprehensive, multi-level interventions at multiple, complementary organizational and institutional levels. In instances where the state SNAP agency has limited or no experience delivering such interventions, they should be required to coordinate NEOP grant activities through subcontracts with one or more organizations that have demonstrated capacity delivering these types of interventions – e.g. state health agencies, state universities, non-profit organization with statewide scope, and local public health, education, and non-profit organizations.

"Consultation." USDA should establish an advisory group composed of individuals who are administering NEOP both at the state and local levels, appropriate CDC staff, representation from other USDA programs involved in nutrition assistance and/or nutrition education, and one or more "at large" seats for national coalitions or programs with missions to improve the health and nutrition status of low income Americans. This group should be convened at least annually and before any changes to regulation/guidance are proposed.

"Coordination." Coordination should be required between state and federal initiatives, including but not limited to *Let's Move!*, obesity prevention efforts of the CDC, community transformation grants, and any other nutrition improvement or obesity prevention initiatives.

We thank you for the opportunity to provide comments from education practitioners and expect that USDA will make every effort to incorporate our input into the regulations.

Sincerely,



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