



American
Public Health
Association

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Protect, Prevent, Live Well

June 17, 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:

On behalf of the American Public Health Association (APHA), the oldest and most diverse organization of public health professionals and advocates in the world dedicated to promoting and protecting the health of the public and our communities, I thank you for the opportunity to comment on key programmatic provisions of Section 241 of the *Healthy, Hunger-Free Kids Act of 2010*, which outlines the Nutrition Education and Obesity Prevention Grant Program. APHA believes the changes to be made to the Supplemental Nutrition Assistance Program Nutrition Education (SNAP-Ed) program will allow states to more effectively use these vital resources to better serve low-income individuals.

With proper regulatory guidance, the newly revamped SNAP-Ed program has an unprecedented opportunity to address three public health challenges simultaneously: hunger and food insecurity, chronic disease control, and obesity prevention. The SNAP-Ed program can address the three disparities simultaneously by giving states and communities the opportunity to make policy, system and environmental changes and enabling current and potential SNAP beneficiaries to make healthier food and physical activity choices the easier choices in low-income social environments. USDA can facilitate this opportunity by issuing regulations based on promising public health practices and policies, including those in obesity prevention, and by partnering with other federal agencies with similar missions. We urge USDA to build on the experience and evaluation that has been acquired through SNAP-Ed over the past decade.

Research demonstrates that multifaceted, multi-level approaches are needed to change behavior on a population scale. These efforts include policy, systems, and environmental changes aimed at reaching Americans through a variety of venues and activities, as well as smart mass communications. The First Lady's *Let's Move* Campaign, the *2010 Dietary Guidelines*, multiple reports from the Institute of Medicine (IOM), established programs of the Centers for Disease Control and Prevention (CDC), the National Fruit and Vegetable Alliance, and Leadership for Healthy Communities (LHC) have all developed evidence and practice-based recommendations and guidance on approaches to address obesity at the community, statewide and national levels. APHA recommends that SNAP-Ed regulations be consistent with and augment these lower-funded public health initiatives.

Below are other areas we urge USDA to include in future guidance:

- Target SNAP-Ed interventions to entire communities of need rather than to just individuals. This would include low-wage worksites, school districts with low-resource schools, retail food outlets frequented by low-income patrons, including quick-service restaurants newly participating in menu labeling, and other large-scale community venues;
- Allow funds to be used to promote and improve access to healthy food *and* physical activity;
- Allow funds to be used to address problems of food insecurity and to promote participation in under-used federal nutrition assistance programs;
- Discontinue the current prohibition on education and messaging about the negative health effects of consuming certain foods and beverages. We urge USDA to develop guidance that aligns with the *2010 Dietary Guidelines*, which specifically refer to "food and food components to reduce." Communities and states must be able to engage in work highlighting that regular consumption of certain foods and beverages can contribute to obesity and other nutrition-related health problems;
- Support collaboration among state agencies including efforts among cooperative extension, state nutrition networks, education departments, public health departments, entities implementing prevention activities in the the Affordable Care Act, and non-profits with similar missions;
- Ensure that SNAP 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, Indian Tribal Organizations, and non-profits as eligible entities to apply for such funds;
- Encourage multi-year state plans of at least two- to three-years, and streamline detailed paperwork away from fraud and abuse to focus on intervention success and results;
- Ensure that practice-based evaluation of nutrition education, social marketing, policy, system and environmental changes is integrated into initiatives; partner with states to help them upgrade efforts to achieve larger-scale impacts.
- Establish working partnerships for nationwide training, technical assistance, and reporting with sister federal agencies that have similar missions, for example as those outlined in the White House Task Force on Childhood Obesity.

Thank you for the opportunity to provide comments. We hope you will take our recommendations into consideration as you work to strengthen this critical public health program.

Sincerely,

A handwritten signature in black ink, appearing to read "Georges C. Benjamin". The signature is fluid and cursive, with a large, stylized initial "G".

Georges C. Benjamin, MD, FACP, FACEP (E)
Executive Director