June 16, 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:

The Center for Science in the Public Interest (CSPI) strongly supports the key programmatic provisions of Section 241 of the *Healthy, Hunger-Free Kids Act of 2010*, which outline the Nutrition Education and Obesity Prevention Grant Program. CSPI is a nonprofit consumer organization supported by approximately 800,000 members and subscribers to our *Nutrition Action Healthletter*. Since 1971, we have worked to improve health policies and conduct education programs in the areas of food safety and nutrition.

We appreciate the opportunity to comment on Section 241 and believe the legislatively required changes to the Supplemental Nutrition Assistance Program Nutrition Education (SNAP-Ed) program will allow states to more effectively use these vital resources to serve low-income Americans. Given the high obesity rates among low-income individuals and the critical role the SNAP program plays in their diets, program changes could make an important contribution to improving the dietary intake and long-term health of millions of people across the country.

With proper regulatory guidance, the newly revamped SNAP-Ed program would be well positioned to address the public health challenges of poor nutrition and obesity. The SNAP-Ed program must give states and communities the opportunity to use SNAP-Ed funds to support policy and system changes to enable beneficiaries to make healthier food and physical activity choices. We urge USDA to issue regulations that encourage program administrators to use promising public health practices and policies to address nutrition, physical activity, and obesity.

Research demonstrates that multifaceted approaches work best to change behavior. Such 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 nutrition, physical
activity and obesity at the community level. SNAP-Ed regulations requiring such approaches would be consistent with current public health practices.

We strongly urge USDA to discontinue the current guidance that prohibits the use of SNAP-Ed funds for education and programs about the negative health effects of consuming certain foods and beverages. USDA should develop guidance that aligns with the 2010 Dietary Guidelines, which specifically refer to "food and food components to reduce." States and communities must be able to engage in work that educates the public about all aspects of the Dietary Guidelines, including highlighting that regular consumption of certain foods and beverages can contribute to obesity and other nutrition-related health problems.

The country can only address obesity and other nutrition-related health problems successfully if programs are able to discourage the consumption of foods and beverages that are low in nutrients and high in calories or problematic nutrients, such as saturated fats, sodium, and added sugars. The example of soda and other sugar-sweetened beverages – which research strongly suggests is one of the largest drivers of increased calorie consumption in recent decades – is evidence enough for USDA to make this change.

We urge USDA to address the following additional matters in its future guidance:

- Allow funds to be used to improve access to healthy food and physical activity;
- Target SNAP-Ed funds to communities with the greatest need rather than to just individuals with high need;
- Support collaboration among state staff, including cooperative extension, state nutrition networks, and non-profits with similar missions; and
- Ensure that evaluation of nutrition education, policy, and environmental changes is integrated into initiatives.

Thank you for considering these recommendations.

Sincerely,

Margo G. Wootan, D.Sc. Arianne M. Corbett, R.D.
Director, Nutrition Policy Senior Nutrition Policy Associate