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June 15, 2011

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

RE: Implementation of the Nutrition Education and Obesity Prevention Grant Program

Dear Mr. Burr,

We the undersigned members of the Legislature 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. We are particularly eager to comment because we believe the changes Congress made to the SNAP Nutrition Education Program will allow states to more effectively use these vital resources to better serve SNAP eligible individuals.

Hunger and obesity are two public health crises that cost California millions of dollars each year in lost productivity and health care. The newly designed SNAP-Ed Program can address these challenges simultaneously by giving California communities the opportunity to make policy and system changes that will allow SNAP-Ed-eligible Californians to make the healthier food and physical activity choices that are important for their families. This opportunity will be possible only if USDA issues regulations and guidance based on public health practices and proven public health successes, including those in obesity prevention.

History and research have proven that comprehensive efforts that include a variety of approaches – policy, systems and organizational change – 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.¹ Changing neighborhoods,

¹ Hill JO, Peters JC. Environmental contributions to the obesity epidemic. *Science* 1998;280:1371--4. Sallis JF, Glanz K. The role of built environments in physical activity, eating, and obesity in childhood. *Future Child* 2006;16:89--108. Sallis JF, Glanz K. Physical activity and food environments: solutions to the obesity epidemic. *The Millbank Quarterly* 2009;87:123--

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.² Nutrition education alone will not change the buying practices of Californians who live in such neighborhoods.

- Similarly, California's world renowned tobacco control program was the result of collaborative and comprehensive efforts that included a combination of education and policy, environmental, and systems changes throughout the state. This model is worthy of replication in nutrition and obesity prevention.

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 discussed above.

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 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.

The Institute of Medicine, the Centers for Disease Control and Prevention, the First Lady's *Let's Move* Campaign, and the 2010 Dietary Guidelines all recommend comprehensive approaches. SNAP-Ed regulations mandating such an approach would be consistent with current public health practices.

In addition to providing input on definitions, we have a few additional recommendations. 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;

54. Institute of Medicine. *Local Government Actions to Prevent Childhood Obesity*. September 2009. National Academies Press: Washington, DC. Institute of Medicine. *Preventing Childhood Obesity: Health in the Balance*. 2005. National Academies Press: Washington, DC.

² *Designed for Disease: The Link Between Local Food Environments and Obesity and Diabetes*. California Center for Public Health Advocacy, PolicyLink, and the UCLA Center for Health Policy Research. April 2008.

