



October 7, 2017

Secretary of Agriculture Sonny Perdue
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Merging the Center for Nutrition and Policy Promotion into the Food and Nutrition Service

Dear Secretary Perdue,

The Society for Nutrition Education and Behavior (SNEB) is commenting on the proposal to merge the Center for Nutrition and Policy Promotion (CNPP) into the Food and Nutrition Service (FNS). SNEB recommends that in light of this reorganization, USDA must ensure that CNPP has qualified leadership, robust authority, and sustained financial support to effectively and efficiently carry out its responsibilities.

SNEB is a professional organization of nutrition educators dedicated to promoting effective nutrition education and healthy behavior through research, policy and practice. The Society is a National Strategic Partner of CNPP.

What we eat is making us sick. According to the Centers for Disease Control and Prevention (CDC), **7 of the top 10 causes of death** in the United States are due to diet-related chronic diseases such as obesity, Type II Diabetes, heart disease and chronic kidney disease. Treatment for these diseases accounts for **86% of national health care costs**. Over **12 million children** and **more than 78 million adults** nationwide are obese. Obesity-related health care costs alone add up to **\$147 billion US dollars every year.**¹

CNPP's work is more critical now than ever. Since its inception in 1994, CNPP has provided the strongest evidence-based nutrition guidance to Americans. Using the highest quality evidence, CNPP motivates citizens of all ages and backgrounds to make healthy food choices and be physically active. Resources like MyPlate and other nutrition education tools are the most trusted and widely-used resources for helping all Americans navigate how to eat healthfully. CNPP serves as the scientific and nutrition guidance foundation for FNS and other federal food and nutrition education programs, through the Dietary Guidelines for Americans (DGAs); MyPlate, MyWins; Healthy Eating Index; and the USDA food plans.

¹ Centers for Disease Control and Prevention: Nutrition, Physical Activity, and Obesity.

<https://www.cdc.gov/chronicdisease/resources/publications/aag/dnpao.htm>. Published October 24, 2016. Accessed September 29, 2017.

SNEB submits the following recommendations:

Recommendation 1: The CNPP administrator must have credentials in nutrition, medicine, and/or public health and be a Senior Executive Service (SES) career staff.

CNPP's administrator is responsible for overseeing the scientific and nutrition guidance foundation for FNS and other federal food and nutrition programs, as well as nutrition education for all Americans. As such, the administrator needs to be a well respected and highly experienced professional. He or she needs a solid background in nutrition science, population health, epidemiology, evaluation, and public policy.

The National Academies of Sciences, Engineering and Medicine (NAS) recently released a congressionally mandated review of the DGA process. In its report, the NAS emphasizes: "It is important that the DGA be viewed as valid, evidence-based, and free of bias and conflicts of interest."² The administrator of CNPP must have the knowledge, experience, and authority to ensure that the next DGAs meet this standard.

Recommendation 2: Ensure that CNPP has adequate and consistent funding to fulfill its core responsibilities as well as meet the recommendations of the NAS report.

The NAS defined several significant changes and improvements to be included in the process of creating the 2020-2025 DGAs, including more comprehensive recommendations for more specific populations considering the prevalence of diet-disease in the United States as well as a more transparent and rigorous methodological approach.³ Executing these recommendations requires more substantial, sustainable funding than previously allocated to DGA development.

CNPP has never had specific congressionally appropriated funding for *any* of its initiatives including the DGAs. In this new configuration, residing within FNS, CNPP should receive specific appropriations instead of having to rely on a portion of FNS administrative funds. Funding needs to support the rigor, integrity, and enhancement of the DGA process. At the same time, funding is needed for CNPP to carry out its other core initiatives such as updating the USDA Food Plans, which are the basis for SNAP benefit decisions.

In closing, CNPP plays a critically important role in promoting health and preventing chronic disease for all Americans. In its new home within FNS, CNPP will need the right leadership, authority, and sustained financial support to effectively and efficiently carry out its responsibilities.

Best Regards,

Adrienne A. White, PhD, RDN, FAND
President, Society for Nutrition Education and Behavior

² National Academies of Sciences, Engineering, Medicine. *Redesigning the Process for Establishing the Dietary Guidelines for Americans*. Washington, DC: The National Academies Press; 2017

³ National Academies of Sciences, Engineering, Medicine. *Redesigning the Process for Establishing the Dietary Guidelines for Americans*. Washington, DC: The National Academies Press; 2017