

July 13, 2020

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
Jamie L. Whitten Federal Building
1400 Independence Avenue S.W.
Washington, D.C. 20250

Re: Guidance Clarifying that Local Wellness Policy Rules Apply to Digital Food and Beverage Marketing on School-Issued Devices

Dear Secretary Purdue:

The undersigned request that the U.S. Department of Agriculture (USDA) Food and Nutrition Service issue guidance clarifying that local wellness policy regulations¹ apply to food and beverage marketing (hereinafter “food marketing”) on school-issued digital devices, applications, and platforms that students are regularly required to use for schoolwork. Guidance would encourage school districts to configure digital devices in a manner that reduces students’ exposure to unhealthy food marketing and to develop “white lists” of approved digital resources that are free of such marketing.

We represent academic, public health, education, and advocacy organizations working to improve school environments, in this case by reducing food marketing to children and adolescents. With schools across the country closed in response to COVID-19, educational websites, platforms, and applications have become a daily part of students’ lives. Educational websites are among the top websites that market food and beverages to children and adolescents; sugary cereal, sweet and salty snacks, fast food, and sugary drinks advertisements commonly appear on these sites.^{2,3,4,5}

Prompted by parents’ concerns, we recently reviewed popular educational platforms including platforms to which schools direct students. We believe that through digital learning, students have been exposed to unprecedented levels of food marketing for products that would be

¹ 7 CFR §§ 210.31 et seq. Local School Wellness Policy.

² Harris J et al. *Cereal F.A.C.T.S. 2012: Limited Progress in the Nutrition Quality and Marketing of Children’s Cereals*. UConn Rudd Center for Food Policy & Obesity. 2012.
http://www.cerealfacts.org/media/Cereal_FACTS_Report_2012_7.12.pdf.

³ Harris J et al. *Snack F.A.C.T.S. 2015: Evaluating Snack Food Nutrition and Marketing to Youth*. UConn Rudd Center for Food Policy & Obesity. 2016.
http://www.uconnruddcenter.org/files/Pdfs/SnackFACTS_2015_Fulldraft03.pdf.

⁴ Harris J et al. *Fast Food F.A.C.T.S. 2013: Measuring Progress in Nutrition and Marketing to Children and Teens*. UConn Rudd Center for Food Policy & Obesity. 2013.
https://www.fastfoodmarketing.org/media/FastFoodFACTS_Report.pdf.

⁵ Harris J et al. *Sugary Drink F.A.C.T.S. 2014: Some Progress but Much Room for Improvement in Marketing to Youth*. UConn Rudd Center for Food Policy & Obesity. 2014.
https://www.sugarydrinkfacts.org/resources/SugaryDrinkFACTS_Report.pdf.

prohibited in physical classrooms. Given school districts' plans to extend virtual learning next school year, student exposure to unhealthy food marketing is likely to continue.

At a time when childhood food insecurity has increased five-fold,⁶ and millions of low-income students are unable to easily access school meals, unhealthy food marketing on digital learning devices is especially egregious. Such advertisements can trigger cravings, exacerbating students' anxiety about future meals and undermining their families' best efforts to eat healthfully. Reducing students' exposure to online food marketing, especially targeted marketing for low-income students and students of color, is a core priority of our organizations and a necessary step to reduce high rates of diet-related disease that have their roots in childhood.

I. Food Marketing Puts Children's and Adolescents' Health at Risk

Childhood obesity is at an all-time high in the United States.⁷ More than one-third of children are overweight or have obesity.⁸ American children's and adolescents' diets are too high in calories; red, processed meats; full-fat dairy products; refined grains; sugary desserts; and sugar sweetened beverages, and too low in fruits, vegetables, and whole grains.⁹ Food marketing is a key reason children's diets are out of line with dietary recommendations, as advertising plays a key role in children's health and dietary choices.

The food and beverage industries spend close to \$2 billion each year promoting products to children and adolescents,¹⁰ 90% of which are high in sugars, sodium, and fat.¹¹ Children are unable to fully grasp the persuasive intent of advertising.^{12,13} Marketing affects children's food

⁶ Hunger Free America. *Child Hunger Rate Has Increased Five-Fold Since Crisis*. April 13, 2020. <https://www.hungerfreeamerica.org/blog/child-hunger-soars-across-usa-national-poll-finds-nearly-4-10-parents-reducing-food-children>.

⁷ Centers for Disease Control and Prevention, Healthy Schools. *Obesity*. September 18, 2018. <https://www.cdc.gov/healthyschools/obesity/index.htm>.

⁸ Cockrell A et al. Prevalence of Obesity and Severe Obesity in US Children, 1999-2016. *Pediatrics*. 2018;141(3):e20173459.

⁹ U.S. Department of Health and Human Services, U.S. Department of Agriculture. *Shifts Needed to Align with Healthy Eating Patterns*. 2015-2020 Dietary Guidelines for Americans. December 2015. <https://health.gov/dietaryguidelines/2015/guidelines/chapter-2/current-eating-patterns-in-the-united-states/>.

¹⁰ U.S. Federal Trade Commission. *A Review of Marketing Food to Children and Adolescents: Follow-Up Report*. 2012. <https://www.ftc.gov/sites/default/files/documents/reports/review-food-marketing-children-and-adolescents-follow-report/121221foodmarketingreport.pdf>.

¹¹ The Rudd Center. *Food Industry Self-Regulation after 10 years: Progress and Opportunities to Improve Food Advertising to Children*. 2017. <http://www.uconnruddcenter.org/facts2017>.

¹² Strasburger VC. Children and TV Advertising: Nowhere to Run, Nowhere to Hide. *Journal of Developmental Behavior and Pediatrics*. 2001;22:185-187.

¹³ John DR. Consumer Socialization of Children: A Retrospective Look at Twenty-Five Years of Research. *Journal of Consumer Research*. 1999;26:183-213.

and beverages choices, purchases, diets, and ultimately, health.^{14,15,16,17} According to the National Academies of Sciences, Engineering, and Medicine (previously the Institute of Medicine), “food and beverage marketing practices geared to children and youth are out of balance with healthful diets and contribute to an environment that puts their health at risk.”¹⁸

For children and adolescents of color, the health risks of food marketing are even higher than for the general public. Food and beverage companies aggressively target Black and Latinx youth on television¹⁹ and through social media.^{20,21} Compared to their white peers, Black and Latinx youth are more likely to see advertisements for fast food, candy, sugary drinks, and unhealthy snacks.²² Targeted marketing can exacerbate existing health disparities that affect communities of color, as repeated exposure can shape preferences for unhealthy food and beverages.²³

Children’s and adolescents’ environments are cluttered with advertisements for unhealthy food and beverages. They cannot avoid food marketing at stores, restaurants, and movie theaters and through print, radio, contests, events, and sponsorships. In recent years, digital food marketing has become an increasingly popular method to influence children and adolescents. A recent study found that 70% of adolescents like, share, or follow food and beverage brands on social media, and 35% engage with more than five food and beverage brands.²⁴

Engagement may be high because marketers have increasingly sophisticated digital tactics to reach children and adolescents—tactics against which schools are not adequately prepared to defend. Geolocation data and targeted marketing technologies, including geofencing, enable marketers to follow students wherever they go—to playgrounds, parks, and other places where they spend time. Marketers can collect data from mobile phones and other devices that provide “location intelligence” on students and then pair that data with cross-platform capabilities to make a digital device that otherwise would be protected from tracking, such as a school-issued laptop, one more place to target children. And when students move between privacy-protected

¹⁴ Halford J et al. Effect of Television Advertisements for Foods on Food Consumption in Children. *Appetite*. 2004;42(2):221-225.

¹⁵ Halford JC et al. Beyond-Brand Effect of Television Food Advertisements/Commercials on Caloric Intake and Food Choice of 5–7-Year-Old Children. *Appetite*. 2007;49(1):263-267

¹⁶ Andreyeva T, Kelly IR, Harris JL. Exposure to Food Advertising on Television: Associations with Children’s Fast Food and Soft Drink Consumption and Obesity. *Economics & Human Biology*. 2011;9(3):221-233.

¹⁷ Zimmerman F, Bell J. Associations of Television Content Type and Obesity in Children. *American Journal of Public Health*. 2010;100(2):334-340.

¹⁸ McGinnis JM, Gootman JA, Kraak VI. *Food Marketing to Children and Youth: Threat or Opportunity*. Institute of Medicine, National Academies Press. 2006.

¹⁹ Harris J et al. *Increasing Disparities in Unhealthy Food Advertising Targeted to Hispanic and Black Youth*. UConn Rudd Center for Food Policy & Obesity, Council on Black Health, & Salud America! January 2019. <http://uconnruddcenter.org/files/Pdfs/TargetedMarketingReport2019.pdf>.

²⁰ Fleming-Milici F, Harris JL. Adolescents’ Engagement with Unhealthy Food and Beverage Brands on Social Media. *Appetite*. March 2020. 1;146:104501.

²¹ Montgomery K, Chester J. *Digital Food Marketing to Children and Adolescents: Problematic Practices and Policy Interventions*. National Policy & Legal Analysis Network to Prevent Childhood Obesity. October 2011. <https://www.changelabsolutions.org/product/digital-food-marketing-children-and-adolescents>.

²² Harris, 2019.

²³ Grier S, Kumanyika S. Targeted Marketing and Public Health. *Annual Review of Public Health*. 2010. 31(1):349-369.

²⁴ Fleming-Milici, 2020.

educational sites and general-use sites, advertisers have the ability to collect data and sync cookies to other devices students use.²⁵

As proposed federal legislation illustrates, young people today grow up in a powerful and largely unregulated, data-driven digital marketing environment.²⁶ Through cross-device identifiers, geolocation tracking, real-time analytics, and personalization^{27,28}—techniques that food and beverage companies use—children and teens are exposed to marketing messages that are microtargeted, ubiquitous and trigger additional impulse purchases.

The places where children and adolescents learn should be safe havens from marketing distractions. During their school years, students should be developing healthy, life-long behaviors and critical thinking skills. School-sanctioned food marketing undermines students’ development and conflicts with class food and nutrition education. Unhealthy food marketing influences students’ choices in the cafeteria and at home, eroding parents’ ability to act as nutrition gatekeepers. Food advertising harms learning and health which is why, by law, educational environments are supposed to be free from unhealthy food marketing.

II. USDA’s Local Wellness Policy Limits on Food Marketing Are Designed to Protect Students’ Health

To “prevent and reduce childhood obesity,” regulations require school districts to develop policies that limit student exposure to the least healthy food and beverage advertisements.²⁹ These regulations permit marketing only for food and beverages that meet Smart Snacks standards, the standards for foods and beverages sold outside the school meal programs.³⁰ Underpinning these regulations is the understanding that if a product’s nutritional quality is so poor that USDA does not allow companies to sell it in schools, the agency should also not allow them to market the product.

Local wellness policy restrictions on unhealthy food marketing apply “on the school campus during the school day.”³¹ The final rule makes clear that campus restrictions on unhealthy food marketing extend to “areas of the school campus that are owned or leased by the school and used at any time for school-related activities” such as posters, menu boards, and trash cans.³² School-

²⁵ Polacsek M et al. Digital Food and Beverage Marketing Environments in a National Sample of Middle Schools: Implications for Policy and Practice. *Journal of School Health*. September 2019. 18;9:739-51.

²⁶ Office of Senator Josh Hawley. *Senators Hawley and Markey Introduce Bipartisan Legislation to Stop Internet Companies from Spying on Children*. March 12, 2019. <https://www.hawley.senate.gov/senators-hawley-and-markey-introduce-bipartisan-legislation-stop-internet-companies-spying-children>.

²⁷ *2019 Outlook for Data*. iab. March 5, 2019. <https://www.iab.com/insights/2019-outlook-for-data/>.

²⁸ Venugopal S. *How One of the World’s Biggest Marketers Ripped up its Playbook and Learned to Anticipate Intent*. Think with Google. September 2019. <https://www.thinkwithgoogle.com/marketing-resources/data-measurement/pepsi-digital-transformation/>.

²⁹ 7 CFR §§ 210.31 et seq.

³⁰ 7 CFR §§ 210.11 et seq. Competitive Food Service and Standards.

³¹ 7 CFR § 210.31(c)(3)(iii).

³² 81 Fed. Reg. 50151. Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 Final Rule.

issued digital devices, used during normal school hours, are school property, and so privy to local wellness policy restrictions on food marketing.

Reducing food marketing on physical school property is challenging enough, but limiting food marketing on digital devices is even harder. Individual school districts need additional help; they need guidance to address rapidly evolving tactics of tech industry titans on school-owned devices, platforms, applications, and websites that teachers require students to visit to complete schoolwork.

III. Educational Platforms, Websites, and Applications Have Become a Daily Part of Students' Lives, Increasing Potential Exposure to Unhealthy Food Marketing

With schools closed in response to COVID-19, educational platforms, websites, and applications have become a daily part of students' lives. Homes have replaced school buildings, and tablets and computers have replaced classrooms. Teachers and families have come to depend on online learning platforms and applications,³³ many of which include marketing for food and beverages. While classroom restrictions on marketing have increased since USDA implemented the "Smart Snacks" rule, advertisers have moved school-based food marketing online where it is largely unregulated.³⁴

This year, and likely next, some 51 million students across the country will engage in distance learning from home.³⁵ To extend the school campus to children's and adolescents' homes, school districts have rushed to procure additional digital devices. In March, New York City's Department of Education purchased 300,000 new iPads. Los Angeles acquired 150,000 laptops, and Chicago is in the process of securing 37,000 new devices.³⁶ Many of these are devices that districts distributed to their lowest-income students,³⁷ the same students who are at higher risk for obesity and overweight,³⁸ food insecurity,³⁹ and targeted marketing.⁴⁰

Students are spending significantly more of their learning time online, and because more parents and caregivers are now home with their children, they have greater insight into their children's digital experiences. Parents and caregivers shared examples of food marketing children viewed on sites visited under the direction of their schools and teachers. In a particularly telling example,

³³ Brenan M. Over 8 in 10 Parents Now Say Child Is Learning Remotely. *Gallup*. April 8, 2020.

<https://news.gallup.com/poll/307754/parents-say-child-learning-remotely.aspx>

³⁴ Boninger F, Molnar A, Murray K. Asleep at the Switch: Schoolhouse Commercialism, Student Privacy, and the Failure of Policymaking. *National Education Policy Center*. 2017.

<https://nepc.colorado.edu/publication/schoolhouse-commercialism-2017>.

³⁵ Map: Coronavirus and School Closures. *Education Week*. May 15, 2020.

<https://www.edweek.org/ew/section/multimedia/map-coronavirus-and-school-closures.html>.

³⁶ Saleh Rauf D. Coronavirus Squeezes Supply of Chromebooks, iPads, and Other Digital Learning Devices. *Education Week*. April 1, 2020. <https://www.edweek.org/ew/articles/2020/04/01/coronavirus-squeezes-supply-of-chromebooks-ipads-and.html>.

³⁷ Saleh Rauf, 2020.

³⁸ Centers for Disease Control and Prevention. *Childhood Obesity Facts*. June 24, 2019.

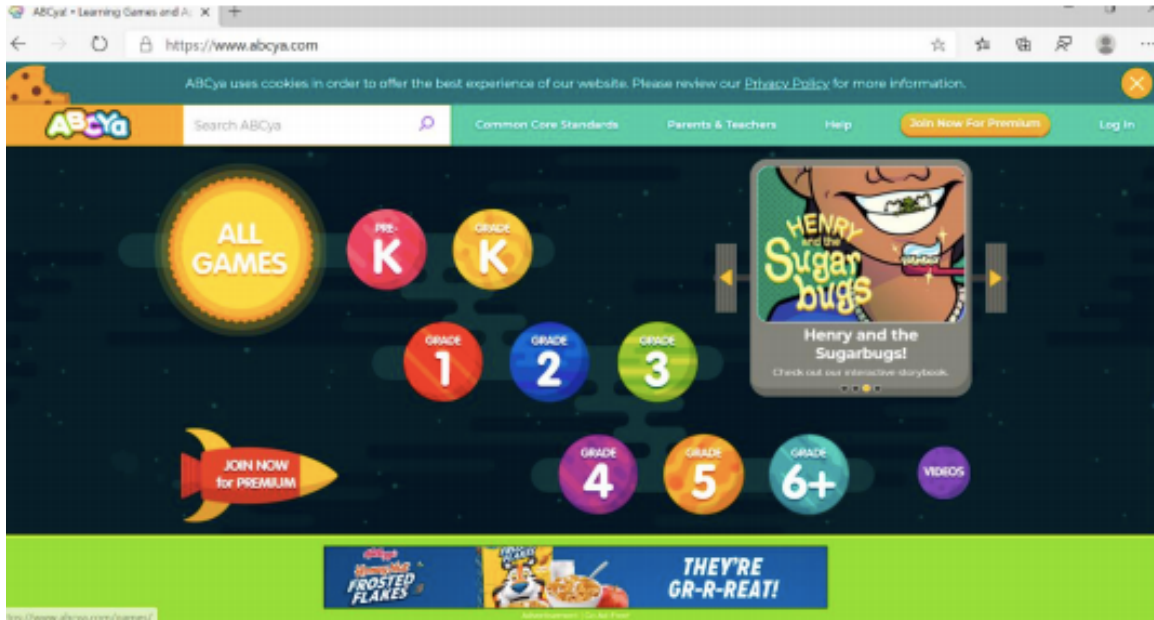
<https://www.cdc.gov/obesity/data/childhood.html>.

³⁹ Hunger Free America, 2020.

⁴⁰ Powel L, Wada R, Kumayika S. Racial/Ethnic and Income Disparities in Child and Adolescent Exposure to Food and Beverage Television Ads across U.S. Media Markets. *Health Place*. September 2014;29:124-131.

an advertisement for Kellogg’s Honey Nut Frosted Flakes, a product that does not meet competitive food standards, appeared next to a web story “about a young boy learning to brush his teeth” called *Henry and the Sugar Bugs*.⁴¹ (See Figure 1). Advertisements like the Honey Nut Frosted Flakes disrupt positive learning experiences and can undermine educational messages.

Figure 1: Unhealthy Food Advertisements on Popular Educational Platforms Can Disrupt Positive Learning Experiences



ABCya.com, the platform where the Honey Nut Frosted Flakes advertisement appeared, allows paying users to avoid advertisements. Of the 551 children’s educational websites we reviewed, approximately 60% have advertisements or unclear policies around advertising, including unclear behavioral and contextual advertising policies.⁴²

The cost of educational subscriptions can be prohibitive for lower-income families and for families struggling financially during the COVID-19 pandemic. Ultimately, tiered payment structures like ABCya’s can create inequitable learning environments and exacerbate racial, ethnic, and socioeconomic disparities in child-directed food marketing and health.

The food and beverage industry has acknowledged that across the board, advertising on educational platforms during COVID-19 is unacceptable. Several of the signatories of this letter reached out to the three major food companies advertising on ABCya.com and to the Children’s Food and Beverage Advertising Initiative (CFBAI) in May 2020 with our concerns. Kellogg’s, McDonald’s, and Kraft Heinz agreed to remove advertisements from ABCya.com. McDonald’s pledged to pull upcoming Happy Meal campaigns on similar websites, and Kraft Heinz promised

⁴¹ *Henry and the Sugar Bugs*. https://www.abcya.com/games/henry_and_the_sugarbugs. Accessed May 5, 2020.

⁴² Analysis of Common Sense Media *EdTech Reviews: Ads & Tracking Privacy Rating Data*. All EdTech reviews are available at <https://www.common sense.org/education/search?contentType=reviews>.

not to advertise on similar sites for the remainder of 2020. Following the companies' pledges, CFBAI responded by recognizing:

“the extraordinary circumstances caused by COVID-19, including school closures and the widespread adoption of online learning... We shared CSPI's concerns regarding this issue with the other participants and, in light of the unusual situation we find ourselves in, informally asked them to consider avoiding advertising, for the rest of 2020, on abcya.com and a list of similar-looking sites that we provided to the group. The group responded positively and the companies are taking steps to meet this request expeditiously.”⁴³

Pausing food marketing on educational platforms is a notable step for these companies and CFBAI, and we applaud them for recognizing the problematic nature of this marketing during the public health crisis. But school districts need more than a temporary promise from the select companies that are voluntary CFBAI members—they need clear, comprehensive, and sustained action from USDA.

IV. USDA Should Clarify in Guidance that Food Marketing Restrictions Extend to Advertisements on School Issued Devices

The current public health crisis has created a problem that demands immediate action. We urge USDA to issue guidance clarifying that local wellness policy regulations apply to food marketing on school-issued digital devices, applications, and platforms that students are regularly required to use for schoolwork, including those on which schools give students usernames and passwords. Such guidance would help school districts comply with existing regulations.

Local wellness policy restrictions for unhealthy food marketing apply “on the school campus during the school day.”⁴⁴ How USDA defines “school campus” and “school day” means that, during times of distance learning, school districts have an obligation to restrict unhealthy food marketing on school-issued digital devices. The agency defines “school day” as “the period from the midnight before, to 30 minutes after the end of the official school day”⁴⁵ and “school campus” as “all areas of the property under the jurisdiction of the school that are accessible to students during the school day.”⁴⁶ School-issued digital devices, used during normal school hours, are property under the jurisdiction of the school, and so should fall under the umbrella of local wellness policy restrictions on food marketing.

The final rule makes clear that the campus restrictions on unhealthy food marketing are to be interpreted broadly. The agency includes a non-exhaustive list of “areas of the school campus that are owned or leased by the school and used at any time for school-related activities” such as buses, scoreboards, coolers, and parking lots.⁴⁷

⁴³ Email correspondence with Maureen Enright of the Children's Food and Beverage Advertising Initiative. June 18, 2020.

⁴⁴ 7 CFR § 210.31(c)(3)(iii).

⁴⁵ 7 CFR § 210.11(a)(5).

⁴⁶ 7 CFR § 210.11(a)(4).

⁴⁷ 81 Fed. Reg. 50151.

USDA has noted the exceptions to food marketing restrictions in the final rule and subsequent guidance and made no exceptions for digital devices. In April 2017 guidance, USDA explained, “The marketing restrictions do not apply to materials used for educational purposes in the classroom, such as teachers’ use of advertisements as an education tool; or when implementing a health or nutrition education curriculum that favors the consumption of some foods over others.”⁴⁸ Absent their use as a teaching tool, unhealthy food and beverage advertisements—including those on the websites—are prohibited on school campuses.

Additional guidance could equip school districts with the tools to tackle digital food marketing. The 2012 proposed rule was notably silent on digital food marketing.⁴⁹ The 2016 final rule only mentioned advertising on “Web sites” a single time (referenced in the paragraph above), though commenters had urged USDA to further clarify how the food marketing provisions would apply to materials developed for academic settings.⁵⁰

Research on school districts’ digital food marketing policies and practices reflects districts’ resulting confusion. Despite the prohibition on unhealthy food and beverage marketing, many districts’ policies do not include language directly dealing with food or digital marketing. Since 2018, more than 1,100 written school district policies have been coded in WellSAT 3.0., a nationally recognized tool that allows districts to compare their own policies to best practices. Of the policies submitted, only two-thirds (68%) have language that explicitly restricts food marketing on school campuses to items that meet USDA Smart Snacks standards, and just one-third specifically address marketing through electronic educational materials.⁵¹

Another study of a national sample of middle schools found that schools fail to effectively protect their students from digital food marketing.⁵² Nearly 97% of middle schools across the country lack a food or beverage marketing policy that extends to the digital realm. More than half do not block advertisements on school-owned devices. And 59% enable location tracking, potentially allowing marketers to geo-locate children and target advertisements accordingly. Lack of clarity at the federal level impacts the district, school, and, ultimately classroom, resulting not only in student exposure to unhealthy food marketing, but also potential breaches of privacy.

V. Conclusion

The current public health crisis has highlighted the important role that schools play in students’ diets and in food security. Some academics have argued that school closures “may exacerbate the epidemic of childhood obesity and increase disparities in obesity risk.”⁵³ Increased use of

⁴⁸ U.S. Department of Agriculture. *Local School Wellness Policy: Guidance and Q&As*. April 6, 2017.

<https://fns-prod.azureedge.net/sites/default/files/cn/SP24-2017os.pdf>.

⁴⁹ 79 Fed. Reg. 10693. Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 Proposed Rule.

⁵⁰ 81 Fed. Reg. 50151.

⁵¹ Schwartz, M. Analysis of Data Collected on WellSAT 3.0 Website. UConn Rudd Center for Food Policy & Obesity. 2020. <https://www.wellsat.org/>.

⁵² Polacsek, 2019.

⁵³ Rundle AG et al. COVID-19 Related School Closings and Risk of Weight Gain Among Children. *Obesity*. March 30, 2020.

digital platforms and applications may further compromise students' diets and health now and in the future.

With guidance on food marketing restrictions, USDA has an opportunity to mitigate some of the longer-term effects of school closures on student health. USDA can help ensure that even in this time of distance learning, schools are able to promote healthy, life-long behaviors. USDA guidance should not only clarify that food marketing provisions in local wellness policy rules must extend to school-issued digital devices, but also provide practical guidelines to help school districts, food and beverage companies, and educational platforms comply with the local wellness policy rules. Such guidance would help school districts address the rapidly evolving tactics of the tech industry, strengthen their local wellness policies, and protect students from unhealthy food marketing on digital devices in the future.

In addition to issuing guidance, USDA should collaborate with the Federal Trade Commission (FTC) and Department of Education to investigate digital food marketing practices in schools and on school-sanctioned educational platforms. FTC has the authority to investigate food marketing practices aimed at children and adolescents, but has not done so since the 2016 local wellness policy rule went into effect. Such an investigation could inform stronger food marketing regulations for schools.

With schools closed, the distinction between what were once school-based safeguards and safeguards for other environments in which children learn is blurred. USDA must protect students and enforce its own local wellness policy regulations by issuing guidance on digital food marketing. We look forward to supporting USDA's efforts to address digital food marketing, as well as the agency's efforts to support healthy eating for children and adolescents across the country.

Sincerely,

Action for Healthy Kids

Alliance for a Healthier Generation

American Heart Association

Association of State Public Health Nutritionists

Berkeley Media Studies Group

Campaign for a Commercial-Free Childhood

Center for Digital Democracy

Center for Ecoliteracy

Center for Science in the Public Interest

ChangeLab Solutions

Color Of Change
Common Sense Kids Action
Consumer Federation of America
Consumer Reports
Corporate Accountability International
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