



June 3, 2013

Jane Duffield
Branch Chief, State Administration Branch
Program Accountability and Administration Division
Supplemental Nutrition Assistance Program
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, VA 22302

Re: RIN 0584-AE07 (Supplemental Nutrition Assistance Program: Nutrition Education and Obesity Prevention Grant Program)

Docket ID: FNS-2011-0017

Dear Ms. Duffield:

The Society for Nutrition Education and Behavior (SNEB) is pleased to comment on the interim rule "Supplemental Nutrition Assistance Program [SNAP]: Nutrition Education and Obesity Prevention Grant Program" (RIN 0584-AE07) published April 5, 2013. SNEB represents the unique professional interests of nutrition educators in the United States and worldwide. We are particularly interested in responding to this regulation because the provisions are very consistent with our vision. Many of our members have extensive experience working with nutrition interventions tailored for low-income families through positions in fields such as public health, Cooperative Extension and higher education.

First, we would like to commend the US Department of Agriculture (USDA) for your clear responsiveness to the input you received from stakeholders and the other federal agencies with which USDA consulted. From the adoption of the definition of nutrition education from "Nutrition Education: Linking Research, Theory, and Practice" to the inclusion of practice-based evidence in the definition of "evidence based", USDA's intention to produce guidance and a regulation based on consensus from both experts and current practitioners is clear. The inclusion of "physical activity" and "active lifestyles" throughout the rule also makes clear the need to be addressing physical activity as an essential component of nutrition education.

We are also pleased to see the provision allowing states to submit three-year nutrition education plans. This provision has the potential to reduce the administrative burden to states, and can allow regional offices to direct more efforts to technical assistance to the implementing agencies. Likewise, we support the provision allowing states to propose alternative targeting methodologies to ensure a greater number of eligible people are reached with SNAP-Ed services.



There are a couple of areas around which we would appreciate greater clarification. First, the proposal notes “To improve program design, States are encouraged to integrate multiple approaches in implementing their activities.” Given the consensus that there are multiple levels of influence on individual food choices and the

Institute of Medicine’s finding that “the most promising approaches for obesity prevention are population-based and multilevel, focus on environmental and policy change, and require participation from actors in multiple sectors,” we were hoping for a stronger statement, e.g., “To improve program design, States are expected to integrate multiple approaches in implementing their activities.” We would also support strengthening the provisions around coordination to ensure efficient and effective delivery of services, e.g. (D)(vii) “The relationship *and processes for coordination* between the State agency and other organizations *or subcontractors providing services*, including statewide organizations, must be described.” Finally, we would also like to see the USDA develop a more meaningful reporting and evaluation system to replace the existing EARS and allow an opportunity for stakeholder input and comment before the new system is adopted.

In general, we see this rule and the supporting SNAP-Ed Plan Guidance as positive steps forward in strengthening this essential benefit of the SNAP program. We are looking forward to seeing the results of the comprehensive nutrition interventions this regulation supports.

Respectfully submitted,

A handwritten signature in black ink that reads "Linda T. Drake".

Linda Drake, President