June 3, 2013

Jane Duffield
Branch Chief, State Administration Branch
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)

Dear Ms. Duffield:

On behalf of the ASNNA Leadership Team and all of our members, you will find our formal comments to the SNAP-Ed Interim Rule in the attached spreadsheet.

Let us begin by applauding the efforts of the FNS staff in developing the FY13 SNAP-Ed Guidance, the first since the implementation of the Healthy, Hunger-Free Kids Act (HHFKA). The guidance incorporated new efficiencies, reallocations and reforms recommended by the HHFKA.

ASNNA appreciates the FNS staff taking time to meet with our members during our annual meeting each year and allowing us to provide input of this high impact program. We view the attached comments as an extension of our on-going dialogue which is critical to the success of this program. ASNNA member agencies remain ready and able to support Guidance updates in order to support a process of continuous improvement of SNAP-Ed. We feel that this rich dialogue allows us to leverage even greater impacts.

Although SNAP-Ed is now focusing more of its efforts on obesity prevention as a result of the HHFKA, ASNNA believes that for SNAP to strengthen its impact on our nation’s public health it must address obesity and hunger with equal prominence. ASNNA also believes that SNAP-Ed should be seen as a sub-national laboratory to develop innovations within SNAP in the areas of hunger and obesity prevention interventions, nutrition education, and physical activity promotion.

ASNNA members have seen impressive results in their states from their coordination of efforts between SNAP-Ed the USDA food assistance programs. We feel that the Interim Rule must create new opportunities for program coordination to ensure that implementing agencies can implement cohesive, comprehensive SNAP-Ed programs to address the health burdens that result from poor nutrition, inactivity, unhealthy food environments, and chronic food insecurity.
ASNNA and its membership of implementing agencies are eager to assist FNS in striving for further efficiencies and improvements in this critical program. Our members stand ready to discuss further how we can make positive strides in furthering nationwide evaluation and program delivery. We applaud your inclusive consultation process and look forward to further dialogue.

Sincerely,

Jo Britt-Rankin
University of Missouri
ASNNA Co-Chair

Doris Montgomery
Iowa Dept of Public Health
ASNNA Co-Chair