



March 25, 2010

Bruce Bundick  
Director, Office of Executive Secretariat  
U. S. Department of Agriculture  
1400 Independence Avenue, SW  
Room 116-A Whitten Building  
Washington, DC 20250

Docket ID: USDA-2010-0001

Dear Mr. Bundick:

Trust for America's Health, a nonprofit, nonpartisan organization dedicated to saving lives by protecting the health of every community and working to make disease prevention a national priority, thanks the U.S. Department of Agriculture (USDA), the U.S. Department of Health and Human Services (HHS), and the U.S. Department of Education (DOE) for the opportunity to comment on the Task Force on Childhood Obesity: Request for Information. We respectfully request that you take into consideration the following suggestions.

**Questions 1 and 2:**

*For each of the four objectives described above, what key topics should be addressed in the report?*

*For each of the four objectives, what are the most important actions that Federal, State, and local governments can take?*

**Objective 1: Ensuring Access to Healthy, Affordable Food**

\*Of note, this answer also addresses Question 14.

As you know, it is estimated that nationwide, 23.5 million people, including 6.5 million children, live in low-income areas that are more than a mile from a supermarket. Eliminating food deserts and increasing access to healthy, affordable food is critical to our nation's fight against obesity. TFAH commends the Administration for inclusion of this pillar.

*Topics*

The Food, Conservation, and Energy Act of 2008 (P.L. 110-246), commonly referred to as the Farm Bill, included some important initiatives aimed at increasing access to healthy foods. For

example, it included a point-of purchase pilot program within the Supplemental Nutrition Assistance Program (SNAP) to encourage households participating in the SNAP to purchase fruits, vegetables or other healthy foods. It also provided for a nationwide expansion of the Fresh Fruit and Vegetable Program, which provides free fresh fruits and vegetables to be served as snacks to schoolchildren. Moreover, it devoted additional mandatory funding to the Farmers' Market Promotion Program, which provides grants to help promote farmers' markets, roadside stands and other direct producer-to-consumer marketing opportunities. TFAH recommends that in the Task Force's report, you include references to and maintenance of these types of programs, which connect communities with farmers and incentivize the purchase of fresh fruits and vegetables in order to make them more affordable.

The President's FY 2011 budget included a proposal to establish a Healthy Food Financing Initiative that would increase the availability of affordable, healthy foods in underserved communities, through the development or equipping of grocery stores and other healthy food retailers. It is important that the report includes reference to initiatives that have been successful in increasing the availability of grocery stores and healthy food retailers in communities so that they can serve as a model for other communities. Such examples could include Pennsylvania's Fresh Food Financing Initiative, a state program that increases the number of supermarkets or other grocery stores in underserved communities across Pennsylvania, Baltimore City's initiative which allows people to order groceries online at libraries and pick them up there, and New York City's efforts to get fruit and vegetable vendors into underserved neighborhoods.

### *Actions*

The Federal government could take the following actions to enhance access to healthy, affordable food:

- Provide increased subsidies for fresh fruits and vegetables;
- Provide incentives to grocers and other healthy food retailers that are willing to establish grocery stores and food retail outlets in underserved communities, as proposed in the Healthy Food Financing Initiative;
- Expand the SNAP pilot described above if it is evaluated to be effective; and
- Encourage Farm-to-Cafeteria Programs.

State and local government also have a role to play and should:

- Explore opportunities to pass state legislation to address food deserts, as Pennsylvania has done through the Pennsylvania Fresh Food Financing Initiative;
- Work with school districts to enhance Farm-to-Cafeteria partnerships; and
- Ensure that new food retail centers include accessible transportation, including mass transportation and pedestrian routes, to ensure access.

### Objective 2: Increasing Physical Activity in Schools and Communities

\*Of note, this answer also addresses Question 15.

Increasing opportunities for physical activity in schools and communities is critical to addressing obesity, and TFAH commends the inclusion of this pillar. Unfortunately, the Centers for Disease Control and Prevention's (CDC) 2006 School Health Policies and Programs Study (SHPPS), a national survey to assess school health policies and programs, found that only 3.8 percent of elementary schools, 7.9 percent of middle schools, and 2.1 percent of high schools provided daily physical education or its equivalent for the entire school year for students in all grades in the school. It also found that only 67.8 percent of elementary schools provided daily recess for students in all grades in the school. Clearly, this is an area where great improvements must be made.

### *Topics*

TFAH hopes that the report will address the barriers to physical education and physical activity in school and communities and also examine what the potential role of the existing No Child Left Behind legislation could have had in creating or exacerbating these barriers. TFAH also recommends that the report provide recommendations as to how the reauthorization of the Elementary and Secondary Education Act (ESEA) can promote physical education and physical activity in schools. Topics relating to ESEA should include exploring opportunities for promoting physical activity through the 21<sup>st</sup> Century Community Learning Centers program, and promoting safety and physical fitness through the Successful, Safe and Healthy Students program, as proposed in the DOE's "A Blueprint for Reform: Reauthorization of the Elementary and Secondary Education Act". Finally, TFAH recommends referencing child care in this pillar. The 2001 National Household Education Survey found that 74 percent of children in the United States ages three through six are in some form of non-parental care, and 56 percent are in center-based child care. Addressing risk factors for obesity in the child care environment should be a priority for this Task Force.

### *Actions*

The Federal government could take the following actions to increase physical activity in schools, communities, and child care centers:

- Provide robust funding for the Community Transformation Grants authorized through the Patient Protection and Affordable Care Act of 2010. These grants will help leverage the success of existing evidence-based disease prevention programs, such as those that promote healthier eating and increased physical activity, or establish new programs in areas that currently do not receive funding. These interventions will promote healthy environments and behaviors by making it easier for people to make healthy choices, such as engaging in physical activity;
- Provide technical assistance and funding to state and local health departments to perform Health Impact Assessments to examine how the built environment affects physical activity levels in a community and to determine what the key barriers may be and how to address them;
- Expand the Safe Routes to School Program by providing additional funding and expanding it to include safe routes to parks, grocery stores, and other areas of importance in communities;

- Expand the 21<sup>st</sup> Century Community Learning Centers Program and ensure that promoting physical activity is an allowable use of funding;
- Promote physical activity and physical education through the reauthorization of the Elementary and Secondary Education Act; and
- Provide technical assistance to states and disseminate information regarding ways to promote physical activity and limit screen-time in the child care setting.

State and local government also have a role to play and should:

- Ensure that Physical Education instructors have the training and resources they need to provide children and adolescents with quality physical education;
- Ensure that school wellness policies include strong physical education and physical activity components;
- Enforce laws relating to requirements for physical education for students;
- Establish child care licensing regulations that require vigorous or moderate physical activity and set daily screen-time limits;
- Ensure that parks and other venues for physical activity in communities are safe; and
- Examine school siting policies.

### Objective 3: Providing Healthier Food in Schools

\*Please note that this answer also applies to Question 13.

In order to address childhood obesity, it is essential that we reach children where they spend the most time. That includes schools, and TFAH commends the inclusion of school foods as a pillar. However, we believe that this pillar should also encompass the child care setting.

#### *Topics*

TFAH encourages the report to address a few important topics with regard to providing healthier food in schools. These topics include: nutritional standards for competitive foods (a la carte, vending, school stores, etc.), nutritional standards for school meals, farm-to-cafeteria programs, and the Fresh Fruit and Vegetable Snack Program. All of these programs can be enhanced to improve access to healthy foods. Additionally, the report should review what has been done and what could be done in the child care setting with regard to promoting healthy eating.

#### *Actions*

The Federal government could take the following actions to provide healthier food in schools and in the child care setting:

- Update the national nutrition standards for competitive foods (those foods sold out of vending machines, a la carte, school stores, and other foods sold outside of meals) through Child Nutrition Reauthorization;
- Ensure that USDA finalizes the regulations to ensure that schoolchildren consume foods through the school meal program that are recommended in the most recent Dietary Guidelines;
- Promote farm-to-cafeteria programs and the Fresh Fruit and Vegetable Snack Program;

- Provide increased funding for nutrition education in schools;
- Provide increased funding to upgrade school cafeterias and ensure they have the equipment necessary to receive, store, and serve healthy foods including fresh fruits and vegetables;
- Provide technical assistance to states and disseminate information regarding ways to promote healthy eating in the child care setting;
- Require schools to strengthen local school wellness policies by enhancing their implementation;
- Revise the nutrition standards for meals, snacks and beverages served through Child and Adult Care Food Program to make them consistent with the most recent U.S. Dietary Guidelines.

State and local government also have a role to play and should:

- Establish nutritional standards for competitive foods that are consistent with current nutritional science;
- Limit where and when competitive foods may be sold, beyond federal requirements;
- Promote farm-to-cafeteria programs; and
- Establish child care licensing regulations requiring that meals and snacks should be consistent with the most recent Dietary Guidelines for Americans

#### Objective 4: Empowering Parents with Information and Tools to Make Good Choices for Themselves and Their Families

\*Please note that this answer also applies to Question 12.

While we can make great progress in addressing obesity in schools, communities and in the child care setting, we cannot underestimate the importance of the home environment. Parents must reinforce the importance of healthy eating and engaging in physical activity, and it is appropriate for the government to help provide parents with the tools and information necessary to make healthy choices.

#### *Topics*

TFAH encourages the Task Force to include in the report a description of the types of information and toolkits that are most useful to parents, the best settings for distributing these toolkits, and the best messengers to deliver the information. This should include identification of successful models for parental engagement. Additionally, the report should address marketing to children and nutrition labeling.

#### *Actions*

The Federal government could take the following actions to empower parents with information:

- Develop toolkits and tips for promoting healthy eating and physical activity and work with schools, health departments, nonprofits, and child care centers to disseminate the information;

- Develop a national strategy and a public education campaign to reduce children’s and adolescents’ total screen-time exposure;
- Continue the Federal Trade Commission’s current efforts to work with food and beverage manufacturers, restaurants, and entertainment companies to encourage companies to adopt or strengthen existing food marketing policies; and
- Continue the Food and Drug Administration’s efforts to enhance front-of-package labeling regulations.

**Question 3:**

*Which Federal government actions aimed at combating childhood obesity are especially in need of cross-agency coordination?*

Cross-agency coordination will be a very important part of our fight against obesity. Areas in particular need of cross-agency coordination include:

- Making improvements to the built environment and transportation policies in order to facilitate physical activity (Department of Transportation, Department of the Interior, Department of Health and Human Services);
- School Health, including promoting healthy eating, physical activity, physical education and ensuring safe routes to school are available (Department of Health and Human Services, Department of Education, Department of Agriculture, Department of Transportation); and
- Implementing the community transformation grants authorized through the Patient Protection and Affordable Care Act, including ensuring that these grants coordinate policy, programmatic, and infrastructure changes in communities (Department of Health and Human Services and the Department of Transportation, as well as health and transportation officials on the state and local level).

**Question 4:**

*For each of the four objectives, what are the most important actions that private, nonprofit and other nongovernmental actors can take?*

The government alone cannot mitigate and ultimately reverse the obesity epidemic. The most important actions that other actors can take include:

- The food and beverage industry should voluntarily eliminate marketing of unhealthy foods and drinks to kids;
- The food and beverage industry should voluntarily eliminate the sale of unhealthy foods and beverages in schools; and
- Nonprofit and private organizations should become actively engaged in community coalitions aimed at enhancing opportunities for healthy eating and physical activity in communities, including by participating in the planning process as funds are awarded for the community transformation grants authorized under the Patient Protection and Affordable Care Act.

**Question 9:**

*What important factors should be considered that do not fit easily under one of the four objectives?*

The built environment can serve as a barrier to healthy choices, or it can help promote healthy behaviors. Ultimately, health is a personal responsibility. But the built environment, especially our access to nutrition and physical activity, has a great influence on our ability to exercise that personal responsibility. If we are serious about improving health in the U.S., we simply cannot ignore the fact that the built environment influences health behaviors. Strategies relating to improving the built environment and linking transportation and health policy are notable omissions from this initiative. Yet, the built environment cannot and should not be omitted from this process. To truly address obesity, we must reach kids in schools, in communities, in child care settings, and at home. If we want kids to be more active and to eat nutritious foods, then we must ensure that they live in communities where they have access to healthy foods and physical activity. Healthy community design, transportation, and land use policies can have a tremendous impact on whether or not it is possible to lead an active, healthy lifestyle. TFAH urges the Task Force to consider adding another pillar relating to enhancing the Built Environment and Linking Transportation and Health Policy.

**Question 10:**

*What are the key unanswered research questions that need to be answered with regard to solving childhood obesity and how should the Federal Government, academia, and other research organizations target their scarce resources on these areas of research?*

To track our progress in mitigating and reversing the childhood obesity epidemic, we need good data. TFAH recommends that the federal government fund surveys on an annual basis to obtain state and community level data on childhood obesity rates. TFAH also recommends that CDC expand the Youth Risk Behavior Surveillance System (YRBSS) to all 50 states. Another tool is the National Youth Fitness Study, which is conducted among a national sample of students in grades K-12. TFAH recommends funding this study in order to enable CDC to measure physical fitness, activity, dietary behaviors and BMI; identify factors that affect levels of fitness, activity and diet; measure the characteristics of health and physical education, school food and school environment among schools sampled; and examine the impact of physical fitness and activity upon academic outcomes. Finally, another area for increased research is the connection between the built environment and physical activity. Further research could help clarify how characteristics in one's community influence physical activity levels.

**Question 11:**

*What other input should the Task Force consider in writing the report?*

Tackling the issue of childhood obesity is going to require a coordinated, systemic response that engages all sectors of government, the nonprofit and private sectors, businesses, religious institutions, and families. As you embark upon this challenge, please consider the following:

- Transportation policy can help promote or thwart opportunities for healthy, active living. It is essential that this Task Force engage with the DOT, and that state and local health officials engage with local planning officials to ensure that their community design is maximizing opportunities for physical activity.
- Safety is an important concern when dealing with obesity prevention. Whether relating to injury prevention when engaging in physical activity, or ensuring that trails and parks are safe, it is important that this Task Force recognizes the importance of safety and encourages partnerships with local law enforcement.
- The obesity epidemic has national security implications. A report by Mission Readiness found that 27 percent of the nearly 32 million Americans aged 17 to 24 are too overweight to join the military. The Task Force should consider how it can partner with the Department of Defense and present and former military leaders to raise awareness among children regarding the importance of healthy, active lifestyles.
- Schools are a major area of focus for this initiative, as they should be. However, the child care setting is also very important and should be referenced when schools are referenced.
- The President's Council on Physical Fitness and Sports could serve as a way to reach out to our youth, but it needs to be adequately funded and reinvigorated.
- Stronger linkages must be made between the medical and public health communities with regard to obesity prevention. The Task Force and the Surgeon General should continue to engage with the health care community regarding obesity prevention and should explore ways to better connect pediatricians and other health care providers with community prevention programs that promote healthy eating and physical activity for children. The Task Force could also explore whether these lifestyle interventions could be reimbursed.

TFAH commends the Administration's leadership and prioritization of childhood obesity prevention. We hope that you will utilize our annual obesity report as a resource: <http://healthyamericans.org/reports/obesity2009/>. The 2010 version will be released this June. We thank you again for the opportunity to comment on the Task Force on Childhood Obesity: Request for Information and hope to engage with you on this issue in the future.

Sincerely,



Jeffrey Levi, PhD  
Executive Director  
Trust for America's Health  
[www.healthyamericans.org](http://www.healthyamericans.org)