



April 13, 2010

Carlette Huntley
U.S. Department of Education
550 12th Street, SW, Room 10071
Washington, D.C. 20202-6450

SENT VIA e-mail to: carlette.huntley@ed.gov

Dear Ms. Huntley:

The Society for Nutrition Education (SNE) welcomes the opportunity to comment on the March 16, 2010 Federal Register Announcement providing notice of proposed priorities, requirements, and definitions for the Carol M. White Physical Education Program (PEP). (Federal Register, Vol. 75, No. 50, pages 12522-12532).

SNE supports enthusiastically the new approach as outlined in the supplementary information description, which proposes a *'new direction to strengthen and enhance PEP and to support a broader, strategic vision for (a) encouraging the development of lifelong healthy habits, and (b) improving nutrition and physical education programming and policies in schools and communities to prevent obesity and to decrease the number of children who are overweight or obese. This new direction will focus on increasing opportunities for students to be physically active and practice good nutritional habits in and out of school.'*

SNE believes that the long-term lack of sufficient funding and coordination of existing nutrition education and promotion efforts has resulted in a fragmented system making it difficult, if not impossible, for innovative, evidence based approaches to be developed and implemented in a comprehensive, long-term way. As a result:

- Nutrition education and promotion efforts are insufficient given the impact of nutrition on health.
 - Schools in most states are required to offer nutrition and physical activity instruction, but health teachers reported spending only 4-5 hours per year covering each topic.¹
 - Among elementary classes in which nutrition and dietary behavior were taught, the median number of hours of required instruction that teachers provided on nutrition and dietary behavior decreased from 4.6 in 2000 to 3.4 in 2006.²

- Many child nutrition programs include some nutrition education components but there is no or limited coordination.
 - A 2004 GAO study recommended identifying ways to improve coordination efforts and to strengthen the linkages among nutrition education efforts.³
 - The GAO study also found that the National School Lunch Program (NSLP) and Child and Adult Care Food Program (CACFP) lack a formal administrative structure to systematically deliver nutrition education, to disseminate the nutrition education materials created by Team Nutrition, and to coordinate among the various nutrition and health programs across the state.

- Schools do not have adequate resources or necessary knowledge to prioritize nutrition education throughout the school environment.
 - Only 65% of school districts provide funding for or offer staff development on nutrition and dietary behavior.²

SNE believes strongly that inclusion of more nutrition and physical activity is needed in school and communities. Also, there is no doubt that aligning environmental change to support individual behavior is essential for real impact on obesity, hunger and overall wellness.

Collaboration across federal food assistance programs as well as within public/private partnerships is expected in the legislation that we have been reviewing for Child Nutrition Reauthorization (CNR). Change must extend beyond the school to the broader community of parents and other caregivers. SNE strongly supports Team Nutrition Networks but also sees great value in the broader platform suggested in the proposed PEP priorities, requirements, and definitions.

The proposed Notice makes important strides in addressing some of the above concerns. Our following comments are organized by the PEP priorities outlined in the Federal Register notice.

Proposed Absolute Priority –Programs Designed to Create Quality Physical Education Programs (p. 12522): SNE fully supports the proposed requirement that applicants create programs and policies that address PEP Element 5 regarding nutrition instruction. PEP-funded grants should indeed go beyond the sole focus of physical activity and combine those activities with a nutrition component for a more comprehensive approach to developing healthy lifestyles.

We are also pleased to see that the detailed description of necessary activities in the Proposed Absolute Priority contains as its first component, (1) Instruction in healthy eating habits and good nutrition.

Proposed Competitive Preference Priority 2 – Partnerships Between Applicants and Supporting Community Entities: SNE supports the principle stated in the background that “As part of a comprehensive approach to encouraging youth to be more physically active and eat healthier foods, schools and communities should have common and consistent policies, practices and expectations for healthy eating and physical activity....”

We also support a more coordinated approach with the PEP grants to engage other community efforts to improve physical activity and nutrition policy and programs in schools and communities. As is outlined in the Notice, SNE supports a formal partnership agreement to institutionalize the collaboration in order to leverage a wide variety of community partners and funding streams, including contributions from stakeholders with nutrition expertise. As proposed, applications from either a Local Education Agency (LEA) or a Community Based Organization must contain, as part of the partnership agreement necessary for the application, a signature from a representative of a local organization or, with respect to a LEA agreement, the child nutrition director.

Proposed Requirement 1 – Align Project Goals With Identified Needs Using the School Health Index: SNE supports the proposed requirement to have PEP applicants complete the physical activity and nutrition questions in Modules 1-4 of the Centers for Disease Control and Prevention (CDC) School Health Index self assessment and planning tool. Module 4 in particular is important to SNE since it would require the PEP project to assess their nutrition services in the overall context of their “school health environment”.

Proposed Requirement 2 – Nutrition and Physical Activity-Related Policies: SNE agrees with the Notice’s recognition that healthy lifestyle interventions cannot rely on instruction alone. As such, we support the requirement that “grantees be required to develop, update or enhance physical activity policies and food- and nutrition-related policies that promote healthy eating and physical activity throughout students’ everyday lives”. We support the suggested consideration of a number of school policies as outlined in paragraph two of this section as well.

Proposed Requirement 3 – Linkage with Local Wellness Policies: SNE supports the proposed requirement that PEP applicants participating in programs authorized by the Richard B. Russell National School Lunch Act or the Child Nutrition Act of 1966 must demonstrate how their local wellness policies required by those Acts will align and support their PEP initiative.

Proposed Requirement 4 – Linkages with Federal, State, and Local Initiatives: SNE is a strong supporter of USDA’s Team Nutrition initiative. We were pleased to see it highlighted as a way of complementing PEP projects. We also fully support the requirement that PEP applicants receiving Team Nutrition (TNN) funding must describe how its proposed project will support Team Nutrition efforts. To that end, we urge that the language be strengthened to more closely coordinate Team Nutrition coordinators in the planning and implementation of the PEP project and to require an affirmation and signature from the Team Nutrition coordinator that he/she has been consulted and will be involved in the PEP project.

Effective nutrition education and promotion efforts, delivered through a well-funded TNN initiative, go hand-in-hand with delivering nutritious foods and beverages through school meal and other nutrition assistance programs. While it is critical for all youth to have access to nutritious meals, for schools and other child nutrition programs to limit access to unhealthy foods and beverages, and for physical education and activity programs to be promoted, it is equally

critical to provide learning opportunities that teach youth—in ways that impact behavior—the importance of a healthy diet, to help them establish and maintain life-long habits, and to have the messages and initiatives coordinated and targeted, based on state and community needs.

Proposed Requirement 5 – Updates to Physical Education and Nutrition Instruction Curricula:

SNE believes that one of the key components of assuring effective nutrition education is the identification and dissemination of effective evaluation strategies. Metrics are needed to assure that teachers, child nutrition professionals, school nurses, health clinic professionals, and others charged with conducting nutrition education and promotion programs and activities are qualified and have the tools to succeed in this important endeavor. For this reason, SNE supports the requirements that PEP grantees complete the healthy eating module of the CDC’s Health Education Curriculum Analysis Tool (HECAT), and describe how the HECAT assessment would be used to make nutrition education instruction curricular changes.

Proposed Requirement 9: Required Performance Measures and Data Collection: SNE supports the expansion of the required performance measures to include the nutrition habits of students participating in the PEP program. In the past, the two measures used focused solely on physical activity.

The third measure proposed would assess the student’s nutrition habits by assessing daily fruit and vegetable consumption (Column 3 of Federal Register page 12530). The Notice proposes that PEP grantees assess this by administering five designated fruit and vegetable questions from the Youth Risk Behavior Survey (more info on the survey may be found at <http://www.cdc.gov/HealthyYouth/yrbs/index.htm>).

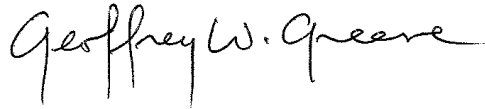
While this is a validated assessment tool, documented difficulties with the Youth Behavior Risk Survey questions suggest a need for revision and rewording that is more appropriate for youth in order to gather the most accurate data possible. Further, SNE recognizes that grantees will likely differ in their fruit and vegetable offerings (culturally, seasonally, and in preparation or presentation style) and may therefore need assessment tools better tailored to their specific situations. SNE encourages PEP to allow for flexibility in the use of and the development of such site, region, or state-specific instruments.

Grantees would measure the percentage of students served under PEP who consumed fruit two or more times daily and vegetables three or more times per day.

Proposed Definitions: SNE encourages addition of “public health” as a type of allowable organization in the definition of “Organization supporting nutrition or healthy eating.” Also please note: As SNE is not a trade association and does not represent any producers or marketers of food and beverages products, our organization fits with the proposed definition of an “Organization supporting nutrition or healthy eating.”

On behalf of the Society for Nutrition Education, thank you for the opportunity to comment on the proposed Notice and the increased focus on nutrition within it. We offer you our expertise and additional insights as you proceed. Please contact Jackie Williams, SNE's Executive Director at 317-328-4627 or jwilliams@sne.org should you have any questions.

Respectfully submitted,



Geoffrey W. Greene, PhD, RD, LDN, President
Society for Nutrition Education

ABOUT THE SOCIETY FOR NUTRITION

The Society for Nutrition Education is an international organization of nutrition education professionals who are dedicated to promoting effective nutrition education and communication to support and improve healthful behaviors with a vision of healthy communities through nutrition education and advocacy. Visit the Society for Nutrition Education at www.sne.org.

References

1. Story M, Nannery MS, Schwartz MB. Schools and obesity prevention: Creating school environments and policies to promote healthy eating and physical activity. *The Millbank Quarterly*. 2009;87(1):71-100.
2. Connell DB, Turner RR, and Mason EF. Summary of findings of the school health education evaluation: Health promotion effectiveness, implementation, and costs. *J School Health*. 1985;55(8):316-321.
3. Carpenter J. *Nutrition Education in Public Elementary and Secondary Schools*. 1996. National Center for Educational Statistics, #96852. Available at: <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=96852>. Accessed April 20, 2009.