

**California Department of Public Health
Center for Chronic Disease Prevention and Health Promotion
Nutrition Education and Obesity Prevention Branch
Concerns and Responses
September 23, 2014 Stakeholder Meeting**

This document addresses the concerns received before and during the September 23, 2014 Nutrition Education and Obesity Prevention Branch (NEOPB) Stakeholder Meeting, both in person and through the webinar “chat” option. These concerns, and our responses have been grouped by theme; they may be paraphrased to consolidate those that address the same issue.

As with the questions, concerns related to local health department (LHD) operations of the Supplemental Nutrition Assistance Program (SNAP) Education (SNAP-Ed) program will be addressed with the California Department of Social Services (CDSS) and LHDs as appropriate.

Concerns Related to Schools

1) **Concern:** Schools are an effective venue to reach the target population and their funds have been significantly reduced in the new model.

Response: National SNAP data from 2012 show that 45 percent of those receiving SNAP benefits are under the age of 18 years; a significant segment of that percentage are school-aged. FFY 2015 SNAP-Ed Guidance “encourages targeting first women and then children in households participating in SNAP...” and cites, “the key role mothers have as models for their children’s eating habits.” This guidance does not negate the importance of schools or of the importance of providing SNAP-Ed nutrition education in schools; however, it does imply that interventions should target the mothers/parents of those children as well as utilize other avenues that may be equally as effective. NEOPB has identified that over 40 percent of FFY 2014 funds subcontracted by LHDs were awarded to school-based entities. CDPH is in Year 2 of a four-year evaluation of SNAP-Ed interventions and has undertaken strategic planning to identify and prioritize the interventions on which to focus in the coming years.

2) **Concern:** Compared to the number of schools that were reached in the past, very few schools are actually being touched, and many districts that were funded in the past were not eligible to apply based on LHD criteria.

Response: Schools, districts and county offices of education received 70 percent of CDPH-issued SNAP-Ed funds through 2011 based on their ability to generate State Share (“match”) dollars. There were no other requirements. This situation changed for three reasons:

- The United States (US) Congress legislated reductions in California’s overall SNAP-Ed funds by 30 percent over five years. Even if there were no other changes, the amount of funding to schools would have been reduced. Additionally, Congress also eliminated the match requirement, which had allowed the option to expand the variety of community locations for SNAP-Ed interventions to serve the target population.

- The US Department of Agriculture (USDA) simultaneously requested that California allocate SNAP-Ed funds based on the SNAP-eligible population (per capita funding). The previous allocations were based on the ability to match funds and, on a per capita basis, resulted in over funding those entities that could demonstrate their ability to match. CDPH fulfilled USDA's request for a per capita funding methodology, creating a more equitable distribution of funds and SNAP-Ed activities throughout California. It also resulted in decreased funding to several counties, including Alameda, Shasta, Monterey and others, in which SNAP-Ed funds had been issued primarily to school-based entities.
- To ensure funding is population-based and the program remains sustainable as funding declines through FFY 2018, and to ensure obesity prevention interventions beyond nutrition education continue to be delivered, CDPH changed the funding model to a local health department (LHD) model. LHDs are the primary recipients of funds for direct SNAP-Ed activities but depending on the funding level, they are expected to subcontract a percentage of their funds using a local competitive bidding process. Given the federal expansion of SNAP-Ed interventions beyond education, most of these bids required demonstration of the ability not only to deliver nutrition education but also to implement systems and other changes. Not all schools that competed were successful in winning these bids.

3) **Concern:** The absence of the California Department of Education (CDE) as a State Implementing Agency.

Response: CDPH is not the State Lead Agency for SNAP-Ed and does not have the purview of designating other State Implementing Agencies. It is, however, a priority for CDPH to partner with CDE and other school-focused entities to continue and enhance school-based interventions.

4) **Concern:** How are SNAP-Ed's efforts being implemented by CDPH directly and indirectly through the LHDs being coordinated through CDE efforts, including smart lunchroom programs, local school wellness policies, among others?

Response: LHDs issued competitive bids for subcontracted SNAP-Ed efforts, for which a requirement was the ability to execute organizational changes such as school gardens, smart lunchrooms, and wellness policies. Forty-four percent of subcontracted funds were issued to school-based entities.

5) **Concern:** With the rollout of the Common Core State Standards (CCSS) and the new Local Control Accountability Plans (LCAP) stemming from state-driven Local Control Funding Formula (LCFF) changes, schools are extremely guarded in allowing classroom and staff training time to be spent on obesity prevention activities.

Response: The California Department of Education is the state entity responsible for addressing CCSS and LCAP.

- 6) **Concern:** The nutritional content of school lunches is not optimal.
Response: Nutritional content for school lunches is not within the purview of CDPH. These requirements are set by the USDA and implemented and enforced by CDE and local school districts with support from county Offices of Education.

Concerns on Other Topics

The concerns below address other topics related to the operation of CDPH's SNAP-Ed program. CDPH is committed to working with CDSS and other SIAs to make progress in these areas and will report on these efforts at future Stakeholder Meetings.

- 1) **Concern:** State-level partnerships have been neglected.
Response: CDPH is working together to form partnerships with other state agencies, including CDE, the California Department of Food and Agriculture, and CalTrans, to further SNAP-Ed goals.
- 2) **Concern:** Training Resource Centers (TRCs) have not offered training to other Local Implementing Agencies (LIAs).
Response: While CDPH did not originally include in its scopes of work with the seven Training and Resource Centers (TRCs) to training all other LIA staff, CDPH has requested of all TRCs to issue invitations to webinars and in-person training sessions as space is available and staff from LIAs are encouraged to check availability for these sessions.
- 3) **Concern:** State support for local and regional partnerships has diminished.
Response: CDPH completed a local and regional Partnership Plan in the summer of 2014; plans for Federal Fiscal Year 2015 include implementation of this Plan.
- 4) **Concern:** There has been a programmatic shift away from nutrition education to Policy System, and Environment (PSE) changes.
Response: Providing nutrition education is still a requirement; however, it has been well-established that education alone does not contribute to behavior change in the absence of social acceptance and access, the mission and goals of the SNAP-Ed program cannot be successful without undertaking PSE activities. LHDs determine education and PSE activities and include these in their county Plan.
- 5) **Concern:** SNAP-Ed activities should target all economic levels because obesity affects all economic levels.
Response: USDA rules require SNAP-Ed funds to be spent only on SNAP-eligible populations.

To describe additional concerns, please access the CHDP/NEOPB Stakeholder mailbox at: NEOPBStakeholders@cdph.ca.gov.