











June 5, 2020

Mr. Paul Mishkin Chief Executive Officer IXL Learning 777 Mariners Island Blvd., Suite 600 San Mateo, CA 94404

Dear Mr. Mishkin:

Due to COVID-19, teachers and families have come to depend on online learning platforms and apps like IXL's platform, ABCya. Now that children of all ages have transitioned to online learning, homes have replaced school buildings and tablets and computers have replaced classrooms. With that in mind, the Center for Science in the Public Interest, the Campaign for a Commercial-Free Childhood, the Center for Digital Democracy, The Laurie M. Tisch Center for Food, Education & Policy, the Rudd Center for Food Policy and Obesity, and prominent child health researchers Jennifer Emond from the C. Everett Koop Institute at Dartmouth and Michele Polacsek from the University of New England, are concerned about the potential increase in children's exposure to junk food marketing through digital learning platforms. Together, we ask you to remove food and beverage marketing on ABCya and commit to no food and beverage advertisements on your child-directed platforms in the future.

More than one-third of children in the United States are overweight or obese. Children's diets are often too high in calories, saturated fat, sodium, and added sugars and too low in fruits, vegetables, and whole grains. While a number of factors contribute to poor diets and childhood obesity, food and beverage marketing plays a key role. Marketing affects children's food and beverage choices, purchase requests, diets, and health. Children are uniquely vulnerable to food and beverage marketing; they are often unable to comprehend advertising's persuasive intent and the long-term health consequences of their food choices. This is concerning, as the majority of foods and beverages advertised to children are of poor nutritional quality.

ABCya's marketing practices allow for child-directed marketing of food and beverages. These advertisements distract from a positive learning experience. Parents and caregivers have shared advertisements for foods and beverages on online learning platforms with us. At the end of this letter is an appendix with examples of food and beverage products that children viewed on your site, including advertisements for Lunchables, Frosted Flakes, and McDonald's Happy Meals.

ABCya provides advertisement-free content with paid subscriptions; however, those costs can be prohibitive for many lower-income families and families struggling financially during this COVID-19 pandemic. That practice creates an inequitable learning environment and may exacerbate racial, ethnic,

and socioeconomic disparities in child-directed food marketing and health. In addition, companies participating in the Better Business Bureau's food marketing self-regulatory program, the Children's Food and Beverage Advertising Initiative (CFBAI), have pledged not to advertise their foods and beverages to children in elementary schools. Similarly, they should not advertise on online learning platforms.

Parents, caregivers, and teachers want children to learn and lead healthy lives. They need support from the community, including the digital community, and never more so than now. We ask IXL to commit to supporting children's health by not accepting food or beverage advertising on child-directed platforms, thereby creating a food and beverage advertisement free experience for all users.

We welcome the opportunity to discuss this further. You can reach us via email at <a href="mailto:policy@cspinet.org">policy@cspinet.org</a> and by telephone at 202-777-8352.

Sincerely,

Sara fibakove

Sara Ribakove Policy Associate

Center for Science in the Public Interest

Josh Golin

**Executive Director** 

CCFC: Campaign for a Commercial-Free

Childhood

Jeffery Chester Executive Director

Center for Digital Democracy

of Charter

Julia McCarthy, J.D.

Food-Ed Hub Director

Laurie M. Tisch Center for Food, Education &

Policy

Cc: Lisa Tortolani, Vice President, ABCya

Sally Mancini, MPH

**Director of Advocacy Resources** 

UConn Rudd Center for Food Policy & Obesity

Frances Fleming-Milici, PhD

**Director of Marketing Initiatives** 

France Fleming Milici

UConn Rudd Center for Food Policy & Obesity

Jennifer A. Emond, PhD

Totalacus

C. Everett Koop Institute at Dartmouth

Michele Polacsek, PhD MHS

Professor, Public Health

Director, Center for Excellence in Public Health

University of New England

## Appendix:



