

Appendix B.3

PUBLIC COMMENT 3

From: [Jenna Faltas](#)
To: [Rosenthal, Amy - FNS](#)
Subject: Public Comment (RE: [FNS-2020-0042], [Agency Information Collection Activities: Proposed Collection; Comment Request-Generic Clearance for the Special Nutrition Programs Quick Response Surveys (SNP QRS)])
Date: Friday, February 12, 2021 8:02:21 PM

February 12, 2021

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RE: [FNS-2020-0042], [Agency Information Collection Activities: Proposed Collection; Comment Request-Generic Clearance for the Special Nutrition Programs Quick Response Surveys (SNP QRS)]

To whom it may concern,

As an MPH candidate at Simmons University with a focus in health equity, I understand the importance of efficient, effective program evaluation to ensure our systems are properly designed and functioning to benefit our most vulnerable communities. Currently, the need is even greater as the COVID-19 pandemic has exacerbated the state of national food insecurity; therefore, it is crucial for the Food and Nutrition Service (FNS) to have a means of quickly collecting valuable data on Special Nutrition Programs (SNP) policy and implementation, especially during this time. The FNS should receive approval from the Office of Management and Budget (OMB) for generic clearance to conduct short, quick-turnaround surveys of State, local, and Tribal agencies who administer SNP to allow them to evaluate and improve these programs based on survey feedback in order to better serve those in need.

Vulnerable communities and food assistance:

Vulnerable communities including children, seniors, immigrants, and the economically disadvantaged are at the highest risk of being food insecure. Food insecurity has many detrimental impacts on these communities. For example, children who are food insecure experience both cognitive and developmental delays, while adults face higher rates of chronic disease and mental illness such as depression (RTI International 2014). In addition, seniors struggling with food insecurity experience faster physical and cognitive decline and have an increased likelihood of developing chronic diseases (RTI International 2014). Members of these vulnerable communities often depend on Special Nutrition Programs such as WIC, the National School Lunch Program, and The Emergency Food Assistance Program (TEFAP) to help feed themselves and their families. Program policies and implementation strategies should be evaluated continuously to ensure that programs are best serving these communities. However, as mentioned in the proposed rule, typical FNS studies take multiple years to complete, delaying improvements to policies and processes. Therefore, the Office of Management and Budget should approve the FNS' request for a generic clearance to conduct short, quick-turnaround surveys of State, local, and Tribal agencies who administer SNP to facilitate more efficient program evaluations.

The exacerbation of food insecurity during COVID-19:

The COVID-19 pandemic has had a disastrous impact on food insecurity in the United

States. According to the United States Department of Agriculture, approximately 13.7 million households (10.5%) experienced food insecurity at some point in 2019 (Silva 2020). A recent estimate from Northwestern University indicates that this number has nearly doubled to 23% of households since the start of the pandemic in early 2020. This massive increase in food insecurity has placed a great deal of strain on social safety net programs such as Special Nutrition Programs. Thus, now is the ideal time for the Food and Nutrition Service to conduct quick-turnaround surveys in efforts to evaluate the effectiveness of the policies and implementation strategies of Special Nutrition Programs through agency feedback. It is my hope that the FNS will use this information to respond quickly to policy gaps and implementation flaws/barriers and will act in a manner that promotes more equitable food access for those struggling most during the COVID-19 pandemic.

Sources:

RTI International. "Vulnerable populations disproportionately affected by food security, despite public programs."

ScienceDaily. www.sciencedaily.com/releases/2014/07/140725080156.htm (accessed February 11, 2021).

Silva, Christianna. 2020. "Food Insecurity in the U.S. By The Numbers." Last modified September 27, 2020. <https://www.npr.org/2020/09/27/912486921/food-insecurity-in-the-u-s-by-the-numbers>