

Appendix K1. Public Comment 1

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Agency Information Collection Activities: Proposed Collection; Comment Request – Rapid Cycle
Evaluation of Operational Improvements in Supplemental Nutrition Assistance Program (SNAP)
Employment & Training (E&T) Programs

Comment On: FNS-2022-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Rapid Cycle
Evaluation of Operational Improvements in Supplemental Nutrition Assistance Program Employment and
Training Programs

Document: FNS-2022-0011-0002

Comment on FR Doc # 2022-08011

Submitter Information

Email: ecampbell@eatright.org

Organization: Academy of Nutrition and Dietetics

General Comment

Please see attached for comment from the Academy of Nutrition and Dietetics.

Attachments

SNAPET_AcademyJune2022

June 13, 2022

Mehreen Ismail
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place, 5th Floor
Alexandria, Virginia 22314

RE: Rapid Cycle Evaluation of Operational Improvements in Supplemental Nutrition Assistance Program Employment & Training Programs (SNAP E&T RCE).

Dear Ms. Ismail:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Agriculture related to its information collection activities, “Rapid Cycle Evaluation of Operational Improvements in Supplemental Nutrition Assistance Program Employment & Training Programs (SNAP E&T RCE),” published in the Federal Register originally on April 14, 2022. Representing more than 112,000 registered dietitian nutritionists (RDNs);¹ nutrition and dietetic technicians, registered (NDTRs); and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States and is committed to improving the nation’s health through food and nutrition.

The Academy applauds the efforts of the Food and Nutrition Services of the U.S. Department of Agriculture to utilize rapid cycle evaluation to determine how interventions are most effective in leading SNAP participants to self-sufficiency and believes these efforts may provide practical utility to administering the E&T component of SNAP.

A. Academy Position on Food Insecurity

The Academy is committed to improving the health of Americans by ensuring access to a nourishing, safe and affordable food supply. The dietetics practitioner and nutrition educators consider the health, safety and welfare of the public at all times. The Academy’s guiding principle is our commitment to improving health for all, especially those most susceptible to food insecurity. It is the position of the Academy that systematic and sustained action is vital to achieve food and nutrition security in the United States. To achieve food security, effective interventions are needed, including those that will support SNAP recipients attain long-term, sustainable employment.²

¹The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

²Holben, D. (2010). Position of the American Dietetic Association: Food Insecurity in the United States. *Journal of the American Dietetic Association*. 110(9), 1368-1377.

B. The Academy Supports Evidence-based Programs to Encourage Work

The Academy supports efforts to help low-income individuals develop the skills necessary to acquire steady, reliable work and recognizes that promotion of work is an integral piece of the puzzle to address food insecurity. Specifically, we support programs that have been shown to help people gain the employment and skills that can help lift them out of poverty rather than just provide them with immediate employment.³

Some state and local leaders in the adult education and workforce development sectors have worked hard over the past decade to intentionally engage SNAP participants in high-quality programs and develop partnerships for SNAP Employment and Training (E&T). These efforts, which are still in early stages, require substantial resources and capacity to deliver outcomes. Low-intensity SNAP E&T programs have proven to be ineffective in moving SNAP recipients into jobs that will allow them to achieve economic security.⁴

C. Practical utility of the proposed collection of information

The Academy encourages USDA to:

- 1) Examines effectiveness of E&T culinary training programs.
- 2) Explore a direct hire program for E&T culinary training program graduates to address the K-12 food service worker labor shortage.⁵
- 3) Given the effectiveness of SNAP Education and the Expanded Food and Nutrition Education Program in providing culinary training for individuals to improve eating behaviors, the Academy recommends leveraging existing programs (SNAP-Ed, EFNEP) to contribute to delivering culinary employment training.^{6,7}

D. Conclusion

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Agriculture related to its information collection activities, “Rapid Cycle Evaluation of Operational Improvements in Supplemental Nutrition Assistance Program Employment & Training Programs (SNAP E&T RCE)”. We urge USDA to consider the timing of the data collection and its impact on supporting current job shortages due to COVID. Please contact either Jeanne Blankenship at jblankenship@eatright.org, or Liz Campbell at ecampbell@eatright.org, with any questions or requests for additional information.

³ Ladonna Pavetti, *Work Requirements Don't Cut Poverty, Evidence Shows*, Center on Budget and Policy Priorities, June 2016, <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>.

⁴ Ibid.

⁵ Cooper, D. & Hickey, S., Raising pay in public K–12 schools is critical to solving staffing shortages : Federal relief funds can provide a down payment on long-needed investments in the education workforce, Economic Policy Institute. Retrieved from <https://policycommons.net/artifacts/2232234/raising-pay-in-public-k-12-schools-is-critical-to-solving-staffing-shortages/2989694/> on 25 Apr 2022. CID: 20.500.12592/mt3h96.

⁶ Haynes-Maslow, L. Jilcott Pitts, SB. Osborne, I. Best practices and innovative solutions to overcome barriers to delivering policy, systems and environmental changes in rural communities *Nutrients*, 10 (2018), p. 1012

⁷ Doerr, C. Molitor, F. SNAP-Ed policy, systems, and environmental interventions and caregivers’ dietary behaviors. *J Nutr Educ Behav*, 52 (2020), pp. 1052-1057

Sincerely,

Handwritten signature of Jeanne Blankenship, MS RDN in black ink.

Jeanne Blankenship, MS, RDN
Vice President
Policy Initiatives and Advocacy
Academy of Nutrition and Dietetics

Handwritten signature of Liz Campbell, MA, RDN in black ink.

Liz Campbell, MA, RDN
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