

**From:** Geis, Pamela (CDC gmail.com)  
**Sent:** Friday, June 06, 2014 8:20 PM  
**To:** OMB-Comments (CDC)  
**Subject:** 60Day-14-0909: Public Comment

**Proposed Project**

CDC Diabetes Prevention Recognition Program (DPRP) (OMB No. 0920-0909, exp. 11/30/2014) – Revision – National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP), Centers for Disease Control and Prevention (CDC).

To Whom It May Concern:

I feel, for the most part, that the proposed collection of additional information is reasonable and will also help clarify data collection fields. I do disagree with the elimination of the Location Code and Lifestyle Coach ID.

**AGREE:** *Add fields, if applicable, for contact information for an additional organizational contact and data preparer to the application form.* An additional organizational contact is valuable. We have experienced turnover of three organizational contacts in Wisconsin over the past year. Fortunately, we had a strong relationship with those programs and were able to work with the organizations on notifying CDC about a new organizational contact.

**AGREE:** *Add Participant State [of residence] to the evaluation data.* Addition of a participant state of residence to the data is minor request as, in most cases, the state will be the same, making it easy to populate the field.

**AGREE:** *Change the Core Course Code to Class Code.* Changing the Core Course Code to Class Code is an excellent idea. I was recently working with a program on their first data submission and there was confusion about this code because we refer to the first 16 weeks of class as the "Core Sessions." Both the organizational contact and I mistakenly thought CDC was asking for information on which of the Core Sessions was being presented – until we got to the "Session ID" field.

**AGREE:** *Simplify the codes for Participation Prediabetes Determination by reducing the number of required responses from five to three.* Simplifying the prediabetes determination responses – it's always good when you can simplify!

**PARTIALLY DISAGREE:** *Discontinue the collection of the Location Code, Lifestyle Coach ID, Session Type and Session ID.* While I do not feel losing the Session Type and Session ID are a problem, I do take issue with eliminating the Location Code and Lifestyle Coach ID. I work with several organizations who provide the program in multiple locations and have multiple lifestyle coaches. How will organizations with multiple locations/lifestyle coaches distinguish each location and coach without those fields? If you have a specific lifestyle coach who routinely has poor results with this program, there is a problem with the coach. Without knowing which coach ties back to specific data, there is no way to determine which coach is performing poorly if several submit their data to the organization contact at the same time. It places more burden on the organizations to keep separate lists/data in order to track the information.

Please feel free to contact me if any information I have provided is unclear. Thank you for the opportunity to comment.

*Pam Geis*

Health Promotion Specialist (contracted)  
Chronic Disease Prevention Unit  
State of Wisconsin, Division of Public Health

(262) 573-3983

Geis.Pamela@gmail.com

[www.WisconsinDiabetesInfo.org](http://www.WisconsinDiabetesInfo.org)

Coming together is the beginning. Keeping together is progress. Working together is success. ~ Henry Ford

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*Your Source for Local Resources*

[www.DiabetesLocal.org](http://www.DiabetesLocal.org)

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CDC Response

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Pam Geis  
Health Promotion Specialist  
Chronic Disease Prevention Unit  
Wisconsin Division of Public Health  
PO Box 2659  
Madison, WI 53701-2659

Dear Ms. Geis:

Thank you for taking the time to review and comment on the CDC Diabetes Prevention Recognition Program (DPRP) Standards. The Division of Diabetes Translation appreciates your commitment to improving the DPRP Standards. All of your comments were carefully considered. Included with this letter you will find specific responses to the suggestions and remarks outlined in your letter dated, June 6, 2014.

With the growing number of new cases of type 2 diabetes, it is vital that we continue to implement proven interventions for preventing or postponing this serious disease. The DPRP is an important part of assuring that we meet the goal of reducing new cases of type 2 diabetes. Again, thank you for your interest in the DPRP.

Sincerely,

Division of Diabetes Translation  
Centers for Disease Control and Prevention

**Note:** (C) indicates a comment, suggestion or request for clarification from your organization; (R) indicates a response from CDC (responses are also in blue font)

(C) I feel, for the most part, that the proposed collection of additional information is reasonable and will also help clarify data collection fields. I do disagree with the elimination of the Location Code and Lifestyle Coach ID.

(R) Organizations may continue to collect all or part of this data for internal use. However, this data will no longer be accepted by the DPRP except as stipulated in a transition plan that will be provided to organizations awarded pending or full recognition prior to 12/1/14 (pending OMB approval).

(C) **AGREE:** *Add fields, if applicable, for contact information for an additional organizational contact and data preparer to the application form.* An additional organizational contact is valuable. We have experienced turnover of three organizational contacts in Wisconsin over the past year. Fortunately, we had a strong relationship with those programs and were able to work with the organizations on notifying CDC about a new organizational contact.

(R) Thank you for your comment.

(C) **AGREE:** *Add Participant State [of residence] to the evaluation data.* Addition of a participant state of residence to the data is minor request as, in most cases, the state will be the same, making it easy to populate the field.

(R) We agree that for most in-person programs the location in which the lifestyle program is located will be the same as the state of residence for most of the participants. For virtual programs (e.g., internet-based), the participants' state of residence may vary widely. However, this information should not be difficult to gather or report.

(C) **AGREE:** *Change the Core Course Code to Class Code.* Changing the Core Course Code to Class Code is an excellent idea. I was recently working with a program on their first data submission and there was confusion about this code because we refer to the first 16 weeks of class as the "Core Sessions." Both the organizational contact and I mistakenly thought CDC was asking for information on which of the Core Sessions was being presented – until we got to the "Session ID" field.

(R) After additional internal discussion, we decided not to change the Core Group Code to Class Code. The Core Group Code [Class Code] would not be meaningful to all organizations (e.g., organizations having a "class" of one individual). Thus, the Core Group Code will be discontinued. Organizations may continue to collect this data for internal use. However, this data will no longer be accepted by the DPRP except as stipulated in a transition plan that will be provided to organizations awarded pending or full recognition prior to 12/1/14. Technical assistance will also be available.

(C) **AGREE:** *Simplify the codes for Participation Prediabetes Determination by reducing the number of required responses from five to three.* Simplifying the prediabetes determination responses – it's always good when you can simplify!

(R) Thank you for your comment.

(C) **PARTIALLY DISAGREE:** *Discontinue the collection of the Location Code, Lifestyle Coach ID, Session Type and Session ID.* While I do not feel losing the Session Type and Session ID are a problem, I do take issue with eliminating the Location Code and Lifestyle Coach ID. I work with several organizations who provide the program in multiple locations and have multiple lifestyle coaches. How will organizations with multiple locations/lifestyle coaches distinguish each location and coach without those fields? If you have a specific lifestyle coach who routinely has poor results with this program, there is a problem with the coach. Without knowing which coach ties back to specific data, there is no way to determine which coach is performing poorly if several submit their data to the organization contact at the same time. It places more burden on the organizations to keep separate lists/data in order to track the information.

(R) The DPRP hoped to use this data for evaluation and technical assistance. However, to date, this data has not been very useful. The 2014 DPRP standards are a bit more flexible and include new modes of delivery. With these revisions, the codes will no longer be meaningful for all organizations. Thus, its usefulness to the DPRP would be further diminished. Organizations may continue to collect all or part of this data for internal use. However, this data will no longer be accepted by the DPRP except as stipulated in a transition plan that will be provided to organizations awarded pending or full recognition prior to 12/1/14. There should be no need to maintain separate datasets. Your organizations should be able to submit a subset of your data, containing only the required data elements, to the DPRP.