PUBLIC SUBMISSION

Docket: FNS-2015-0031
Agency Information Collection Activities: Proposed Collection; Comment Request - Food Program and Reporting System (FPRS)

Comment On: FNS-2015-0031-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Food Program and Reporting System

Document: FNS-2015-0031-0008
Comment on FR Doc # 2015-20208

Submitter Information

Name: Laura Kettel Khan
Address:
    4770 Buford Hwy, F77
    Atlanta, GA, 30341
Email: LDK7@CDC.GOV
Phone: 770-488-6018
Organization: CDC
Government Agency Type: Federal
Government Agency: HHS

General Comment

First, CDC appreciates the opportunity to review the new EARS form. The new focus on documenting the reach that direct nutrition education provides for SNAP recipients is a positive step forward in assessing the possibilities for program impact. Considering this improvement in focus there are two significant changes in the information collected for PSE strategies as well as Partnerships to provide greater balance in the depth of knowledge gained for all 3 tactics.

A. We propose that the same demographic information (recipients/participants/age/gender/race ethnicity) be collected for PSE strategies for obesity prevention.
B. We also propose the Partnership section needs to be expanded to include not just who the implementing agencies are partnering with, but also why (what is the goal or anticipated outcome of the collaboration) and how the partnership operates (what does each partner contribute?). If possible it would be beneficial to highlight other federal programs (e.g., USDA WIC, Farmers Market, /Rural Development/Farm-to-School), (CDC DNPAO State programs/High Risk Obesity/Local Food, Local Places/etc.) as well as private funders such as regional and national foundations.

Listed below are more minor formatting suggestions based on our above recommendations. We included the

specific edits to the EARS form section, Item, or Table.

1. EARS 1e and 1f both can be calculated based on 1a and authorized federal funding so it is unnecessary to have the states individually calculate these numbers.

2. EARS 2-6 Direct Education section

2a. No place to indicate what direct education curriculum is provided or the level of evidence that a particular curriculum has.

2b. Tables 2a/2b include incorporate gender and race/ethnicity thereby eliminating Tables 3a,3b, and 4.

2c. Type-O Instructions for Table 6.It should be Instructions for Item 6.

2d. The instructions for 6a and 6b dont make sense. The instructions are mixing direct education assessment with social marketing. These are two different tactical strategies and should be separated in terms of assessment, but should be leveraging each other. Section 7 (Table 7) documents appropriate reach and cost, but should incorporate the leveraging of direct education and PSE strategy(s).

2d(i). We also suggest that the entire Social Marketing section be put after the PSE section. Social marketing should leverage both direct education and PSE strategies so it should be seen in a support role for both direct education and PSE strategies.

2e. PSE section needs to include all the demographic information that the direct education section has so it is not disproportionately reported or valued.

2e(i). For 8a we suggest that not just the number of PSEs be reported, but whether or not they are listed in the SNAP-Ed Toolkit and if not, provide level of evidence for the intervention used.

2e(ii). For 8b edit table format for demographics, reach/eligibility, and evidence level.

2f. Item 9 Partnerships

2f(i). Column D cost of staff time vs SNAP-Ed funds (state level and Implementing Agency (the sub-contractors that do the work with the recipients and communities groups.

2f(ii). Add Goal of Partnership why and specific action and/or accomplishment expected.