

PUBLIC SUBMISSION

As of: 10/20/15 10:51 AM
Received: September 15, 2015
Status: Posted
Posted: September 16, 2015
Category: Govt.-State
Tracking No. 1jz-8l52-tk1t
Comments Due: October 16, 2015
Submission Type: Web

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-2015-0031-0004

Comment on FR Doc # 2015-20208

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General Comment

Section 1 questions 1a-1f does not collect indirect participant data

Question 1d- How will SNAP-Ed agencies report this information to States. What data parameters will be set as directions to States to define SNAP-eligible reach. PSE activities are varied and include stages of implementation. For example, for a policy or system, reach may not be achieved in year one. System changes may be targeted to SNAP eligibles, or communities with large SNAP eligible populations, or organizations that serve SNAP eligibles. How is reach defined for this type of activity.

Question 1f Regarding SNAP-Ed funds spent on PSE activities, how is this to be broken out? Staffing costs only or staffing and administrative? Many PSE activities include working collaboratively with community leaders and organizations and the cost is not solely funded by SNAP-Ed.

Question 2a and b The definitions and instructions for 'others' is missing (non-SNAP)

Question 3 NYS has, on annual basis since 2011, communicated via the SNAP-Ed State Annual Report that the Race Ethnicity section does not afford correct reporting in EARS. NYS, and NYC in particular, has one of the most ethnic populations in the US and we reach a large number of SNAP-Eligibles. Questions pertaining to race and ethnicity continue to cause much confusion for NYS program participants, thereby resulting in what

NYS OTDA believes to be an inaccurate representation of participants served by our SNAP-Ed program. We continue to receive multiple complaints from program participants that the race and ethnicity questions are confusing, intrusive and controversial. Specifically, many Latinos do not identify with any of the race categories and simply consider themselves Hispanic or Latino. Column 1 choices 1-5 does not have a choice for Hispanic or Latino - therefore, there is no place to collect participant reach for this population in EARS resulting in gross underestimation of the reach by race ethnicity for NYS. Just as problematic, when program participants neglect to answer all of the 'required demographic data', this forces NYS to consider the individuals as "indirect" contacts. The new form does not address our concerns and our program reach will continue to be inaccurate in EARS.

Questions 5 Delivery sites should list USDA Summer Meal Sites separately

Question 6 Single Sessions should collect information on 'direct' AND 'indirect' contacts not just 'number delivered'. This is because, obesity prevention events (such as Rethink Your Drink community events) and Nutrition Education at Retail and Farmers Markets that include healthy food demonstration, and obesity prevention activities at health center events, have BOTH direct and indirect contacts, AND OFTEN ONLY INDIRECT. Simply collecting the 'number delivered', does not provide USDA with the TRUE reach of this type of activity which in NYS is huge.

Question 6 Single session time range also should not be limited to just one time frame - a single session could be a workshop/lesson that is 60 minutes or a long term event with smaller times broken out for actual education/demonstrations 20 minutes. The current format of the Single Session table does not enable NYS to provide adequate information to USDA on actual state SNAP Ed activity.

Question 6 It appears that data on indirect activities is no longer collected. Events and single sessions, farmers markets and retail nutrition education, and obesity prevention events target and reach a large SNAP eligible audience, but participants for 'variety of reasons' choose NOT to fill out survey information. Therefore, they are counted as indirect contacts. Where in the new form will data on indirect contacts be collected?

Question 8b does not collect 'stage of implementation'. The term 'adopted' assumes that the PSE is fully implemented. States may be at different stages of implementation- with some initiatives in a pre-development, development, or adopted stage of implementation. The term adopted assumes full implementation. Many policies may be 'completed' in that the policy has been determined to be complete- but adoption may be 'partial'. For example, maybe only a percent of schools or communities are able to implement the policy. SNAP Ed providers are often a 'partner' on PSE activities and the actual implementation of the policy or system is dependent on the community setting in which the policy/system is aimed.