

# PUBLIC SUBMISSION

**As of:** 10/20/15 12:12 PM  
**Received:** October 16, 2015  
**Status:** Posted  
**Posted:** October 19, 2015  
**Category:** Social Svc. Agency-State  
**Tracking No.** 1jz-8lpv-4qqb  
**Comments Due:** October 16, 2015  
**Submission Type:** API

**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-2015-0031-0011

Comment on FR Doc # 2015-20208

---

## Submitter Information

**Name:** Kim McCoy Wade

**Address:**

744 P Street

MS 8-9-32

Sacramento, CA, 95814

**Email:** KimMcCoy.Wade@dss.ca.gov

**Phone:** (916) 651-8047

**Fax:** (916) 654-1295

**Submitter's Representative:** Michael Beccarelli

**Organization:** CalFresh

**Government Agency Type:** State

**Government Agency:** California Department of Social Services

---

## General Comment

See attached file(s)

---

## Attachments

Kim\_McCoy\_Wade\_CalFresh\_Comment\_10.16.15



WILL LIGHTBOURNE  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

October 16, 2015

Ms. Jane Duffield, Chief  
State Administration Branch  
Program Accountability and Administration Division  
Supplemental Nutrition Assistance Program  
Food and Nutrition Service  
United States Department of Agriculture  
3101 Park Center Drive, Room 818  
Alexandria, VA 22302

Dear Ms. Duffield,

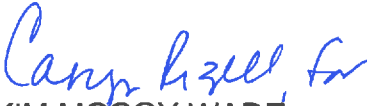
We are writing to you on behalf of the California Department of Social Services (CDSS) and our partners in response to the proposed information collection for the Food Program and Reporting System (FPRS), which is a revision of the Education and Administrative Reporting System (EARS) form FNS-759.

California appreciates the opportunity to provide comments and recommendations on this proposed information collection. We would like to continue working towards improving the effectiveness of EARS form FNS-759 for the Supplemental Nutrition Assistance Program Education (SNAP-Ed) in order to meet the needs of the low-income population through continued collaboration with state and local agencies as well as with the United States Department of Agriculture, Food and Nutrition Service (USDA-FNS).

Please refer to the enclosed for California SNAP-Ed's comments and recommendations regarding the proposed information collection.

Should you have any questions, please contact me at (916) 651-8047 or Caryn Rizell, Nutrition Education and Outreach Bureau Chief, at (916) 654-1435.

Sincerely,

  
KIM MCCOY WADE  
Branch Chief, CalFresh

Enclosure

## **Comments on Notice of Proposed Information Collection**

Proposed information collection for the Food Program and Reporting System (FPRS), which is a revision of the Education and Administrative Reporting System (EARS) form FNS-759.

### **Overview Summary:**

The FPRS facilitates data gathering for reporting data for the Supplemental Nutrition Assistance Program (SNAP) and the Special Nutrition Programs. EARS collects uniform and standard information on nutrition education activities funded through the Supplemental Nutrition Assistance Program Education (SNAP-Ed) with the EARS form (FNS-759) designed as an annual report that SNAP State agencies submit to Food and Nutrition Service (FNS). California requests that the revised EARS form (FNS-759) not be modified in any form other than the recommendations below.

### **FNS-759 – Supplemental Nutrition Assistance Program Education (SNAP-Ed) Education and Administrative Reporting System (EARS) Form:**

#### **Form Item:**

Item 1b states, “Number of SNAP-Ed eligibles reached through direct education (*This value should match that in Item 2A, Column E*).”

#### **Recommendation:**

We recommend that Item 1b be clarified as there is no cell in Table 2a that corresponds to Item 1b. The number of SNAP-Ed eligibles reached through direct education does not equal the sum of Item 2a, Column E (Total Number of SNAP-Ed participants). The total in Item 2a, Column E includes both SNAP recipients and all other participants. The table in Item 2A does not request information about SNAP-Ed eligibility, only SNAP status. If it is assumed that all SNAP-Ed participants are SNAP-Ed eligible, then Item 1b should match Item 2A, Column E, Row 3. Otherwise, there is no cell in this table that corresponds to Item 1b.

#### **Form Item:**

Item 1c states, “Number of SNAP-Ed eligibles reached through social marketing (*This value should match that in Item 7, Column G*).”

#### **Recommendation:**

We recommend that Item 1c be clarified as the table in Item 7 does not request information about the SNAP-Ed eligibility mentioned in Item 1c. Item 7 only contains information on SNAP status or low income status, as written. There is no cell in the table in Item 7 that corresponds to number of SNAP-Ed eligibles as requested in Item 1c.

**Form Item:**

Item 1d states, “Number of SNAP-Ed eligibles reached through policy, systems, and environmental change interventions (*This value should match that in Item 8b*).”

**Recommendation:**

We recommend that Item 1d be clarified as there is no cell in Item 8b that corresponds to Item 1d. The estimated reach reported in Item 8b includes the total reach, not only SNAP-Ed eligibles. There is no field on the form that corresponds to PSE reach for SNAP-Ed eligibles only, so either Item 8 needs to be revised to include this information, or the instruction in Item 1d needs to be revised so that it does not request reach for SNAP-Ed eligibles only.

Providing guidance on how to estimate numbers reached may allow for more consistency from agencies reporting.

**Form Item:**

Item 1e states, “Percentage of SNAP-Ed eligibles reached in your State through each of the above intervention types.”

**Recommendation:**

Instructions for Item 1e should include how to calculate the percentages requested in Item 1e. We recommend the following suggested language: “(Example: for Direct Education, this value should equal Item 1b divided by 1a multiplied by 100).”

If there are recommendations on acceptable percentages for both reach and expenditures, these should be defined.

**Form Item:**

Item 1f states “Estimated percentage of SNAP-Ed funds expended to reach SNAP-Ed eligibles through each of the above intervention types.”

**Recommendation:**

Instructions for Item 1f should include how to estimate SNAP-Ed funds expended and how to calculate the percentages requested in Item 1f. With the exception of the Social Marketing Initiatives section, estimated SNAP-Ed funds expended are not requested elsewhere in the revised EARS form (FNS-759).

If there are recommendations on acceptable percentages for both reach and expenditures, these should be defined.

**Form Item:**

Item 2b states, “A SNAP-Ed contact’ is defined as an interaction in which a SNAP-Ed participant participates in a direct education activity. Each SNAP-Ed participant may have one or more SNAP-Ed contacts.”

**Recommendation:**

We recommend that the explanation of “contact” versus “participant” be placed at the beginning of section 2, rather than the middle (in 2b), as contacts and participants are referenced earlier in Instructions for Items 2a and 2b.

**Form Item**

Item 4. Direct Education: Race and Ethnicity is a table showing direct education participant counts by race and ethnicity.

**Recommendation:**

An additional row should be added to the table for “Declined to State” before the row “11. Total by ethnicity.” Information that is collected from SNAP-Ed participants is provided on a voluntary basis. A certain number of participants decline to self-identify a race. Some educators are not comfortable with assigning a race to participants based on visual estimates. To best respect SNAP-Ed participants’ right to decline to self-identify, it is recommended that an additional row be included for “Declined to State”. Currently, because such a row is not included, these participants are not counted if the nutrition educator is not comfortable assigning a race based on visual estimates.

**Form Item:**

Instruction for Item 5 states, “For each type of direct education setting, enter the number of different sites/location used within the State. Record each site only ONCE on this form.”

**Recommendation:**

We recommend adding language to clarify that “setting” for this item refers to a physical location. This will help guide how to determine which Type of Setting listed is the most appropriate category for each direct education activity setting.

**Form Item**

Item 5. Direct Education: Number of SNAP-Ed Delivery Sites by Type of Setting is a table showing direct education setting counts by type of setting.

**Recommendation:**

In addition to the types of settings already listed, suggest adding these additional types of settings:

- Preschool (not Head Start)
- Afterschool Program sites
- Family Resource Centers

While these sites could be included in the “other” row, they represent a relatively large number of sites for SNAP-Ed delivery and so should be added to the specified listing.

The following two currently listed “types of sites” should include some additional examples:

- “Food Assistance sites” should be added to the “Food Banks/Food Pantries” item
- “Temporary housing” should be added to the Emergency Shelters item.

**Form Item:**

Instructions for Item 6a states, “Indicate below whether the direct education activities you reported are part of a social marketing initiative. More information on the social marketing campaign will be collected in a separate section.”

**Recommendation:**

We recommend removing Item 6a and modifying Item 7 to capture this information. Information on whether direct education is part of a social marketing initiative can be better captured in the Social Marketing Initiatives Item 7. Item 6a is worded so that the “Direct Education is part of a social marketing initiative” box will be checked if only a single direct education activity in the state is part of a social marketing initiative. CDSS is unsure of the utility of this item, as currently written. CDSS recommends capturing information on whether direct education is part of a social marketing initiative by adding a new column to Item 7. This column can be labeled “Contains Direct Education Component” and be added to Item 7 between Column J and Column K. Codes for this column can be “Y = yes” or “N = no.” This change allows for specificity as to which social marketing initiatives have a direct education component.

**Form Item:**

Instructions for Item 6b states, “Indicate below whether one or more of the direct education activities you reported is designed to support policy, systems, and environmental change (PSE) interventions. More information on the PSE activities will be collected in a separate section.”

**Recommendation:**

We recommend removing Item 6b and modifying Item 8b to capture this information. Information on whether direct education is part of a PSE change intervention can be better captured in Policy, Systems, and Environmental Change (PSE) Interventions Item 8b. Item 6b is worded so that the “Direct Education supports policy, systems, and environmental changes” box will be checked if only a single direct education activity in the state is part of PSE change intervention. CDSS is unsure of the utility of this item, as currently written. CDSS recommends capturing information on whether direct education is part of a PSE change intervention by adding a column to Item 8b or as an option in the Item 8b Channel/Setting(s) column. This change allows for specificity in which PSE change intervention has a direct education component.

**Form Item:**

Instructions for Item 7, Column F states, “Enter the estimated number of low-income persons (EXCLUDING SNAP recipients) reached.”

**Recommendation:**

We recommend that the instructions specify what income threshold is used to define “low-income” in order to ensure consistency in reporting.

**Form Item:**

Instructions for Item 7, Example 1 states, “The radio station that broadcasts social marketing nutrition messages has provided demographic statistics to the implementing partner showing the income range of their listening audience. The data show that roughly 20% of the audience or 400 people would not qualify for SNAP-Ed. The estimated count of 80 people should go under Column F and 400 people should be counted under Column G in Item 7 of the form.”

**Recommendation:**

The math in this example as written is incorrect. We recommend revising the language as indicated below in strikethrough and underline. Our suggested correction is as follows: “The radio station that broadcasts social marketing nutrition messages has provided demographic statistics to the implementing partner showing the income range of their listening audience. The data show that roughly 20% of the audience ~~or~~ of 400 people are low-income but do not receive SNAP. 20% of 400 is 80, so the estimated count of 80 low-income people who do not receive SNAP should go in Column F in Item 7 of the form. The total audience of 400 people should be recorded in Column G in Item 7.”

**Form Item:**

Item 7: Description of All Social Marketing Campaigns is a table describing social marketing campaigns.

**Recommendation:**

An additional column should be added to record whether a Social Marketing Campaign supports PSE changes. Item 6b collects information on whether the direct education supports PSE changes, but similar information is not collected about the social marketing activities. Recording whether the Social Marketing Campaign supported PSE changes would better align with LT9 Nutrition Supports Implementation and LT10 Physical Activity Supports Implementation of the Western Regional Office’s SNAP-Ed Evaluation Framework. Indicators LT9 and LT10 collect information on multicomponent initiatives which are defined as where at least one change is made in writing or practice to improve or strengthen access or appeal for healthy eating or for physical activity and either 1) evidence-based education, 2) marketing, 3) parent/community involvement, and 4) staff training on continuous program and policy implementation.

**Form Item:**

Instructions for Item 8b states, “Please identify the PSE(s) adopted, the setting(s), and the estimated reach.”

**Recommendation:**

It would be helpful to include a more detailed listing of example PSEs. For example, could reference a listing of types of environmental changes, procurement changes and preparation changes listed in the Western Region's SNAP-Ed Evaluation Framework for Nutrition Supports Adopted (MT4) and the types of environmental changes and program or practice changes for Physical Activity Supports (MT5). Suggest providing examples not just the number of PSE's "adopted" but what are the types of PSE and how it is sustained or determined.

**Form Item:**

Instructions for Item 9, Column D states, "Enter the total cash expenditure, if applicable, for the partners you work with for the reporting year."

**Recommendation:**

We recommend that Item 9, Column D should not be included since it is no longer part of SNAP-Ed statute or requirements. At minimum, align the instruction language which refers to "expenditure" and the column header which refers to "contribution." Since cost share or cash contributions are no longer required for SNAP-Ed per the Healthy Hunger-Free Kids Act (HHFKA), it is not clear why column D "Total Contributions Reported" is included. Reporting contributions requires formal tracking and compliance with internal auditing and accounting practices if the reporting of in-kind or cash contributions are reported.

**Form Item:**

Item 9: Partnership characterization is a table describing types of partners, types of assistance provided or received, and total contribution reported.

**Recommendation:**

We recommend adding additional Partner Title "Preschool settings."

**Form Item:**

Item 9 states, "requests that you identify all partner entities that were involved this reporting year in your SNAP-Ed programs and that offer any type of support or service (i.e., funding, technical expertise, etc.)."

**Recommendation:**

We recommend use of the language "non-SNAP-Ed funded" partner entities.

**Form Item:**

Instructions for Item 10 states, "Check the top 10 topic areas that were included in interventions this reporting year. (Select a maximum of 10)"



**Recommendation:**

We recommend either removing this section or adding language and examples to the instructions to clarify what is meant by “top 10” topic areas. We are unsure of the utility of this section, as nearly half of the list will be checked off and these topic areas will not be linked to any specific intervention documented elsewhere in this form.

**Form Item:**

Currently not included – Indirect Education.

**Recommendation:**

We recommend the Indirect Education section be retained from the current EARS form as this revised EARS form omits indirect education activities which are included in the current EARS form. We recommend a more specific “indirect education” section be retained from the current EARS form to capture interventions where a participant is engaged in the learning process with an educator and/or interactive media but without the opportunity to obtain information about individual participants’ SNAP participation status, age, gender, and race/ethnicity. Direct face-to-face education is provided at numerous community settings such as with parents at Back-to-School nights, community health fairs, retail settings and SNAP offices where educators interact with SNAP-Ed eligible people in relatively brief periods that make collecting demographic information unrealistic. When developed with a focus on environmental and systems change, these one-time events can impact the community on a deeper level and may later lead to implementation of PSE approaches. These interactions often include interactive activities such as taste-testing or visual aids that can also contribute to participant’s motivation and interest to learn more and try new behaviors. Other activities such as distribution of family newsletters to parents of children participating in direct education in schools and after school programs also reinforce direct education efforts and encourage behavior change within families. The revised EARS form does not capture these types of activities since direct education requires the collection of participants’ demographic information which is not possible with brief interactions or with parent/family newsletters sent home with students.