

October 8, 2018

Andrea Farmer
Community Meals Branch
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1200
Alexandria, VA 22302

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Dear Ms. Farmer:

Thank you for the opportunity to comment on the proposed regulations related to summer food site locations for state agencies. The Wisconsin Department of Public Instruction (WDPI) is the state administering agency for the United States Department of Agriculture (USDA) child nutrition programs, overseeing the Summer Food Service Program (SFSP). What follows below are responses to the specific questions posed in the federal register.

- a) *Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.*

The proposed collection of information is not necessary for the proper performance or implementation of the agency's program. Currently, the WDPI uses software to create our own map of SFSP sites. The map is dynamic and allows citizens to sort based on location, dates of operation, days open, and meal service. The map is available from the WDPI website as well as an app for users accessing it via a mobile platform (phone, tablet).

In addition, Wisconsin citizens have the ability to call 2-1-1 to connect with health and human services available in their communities or text "food" to 877-877.

The data provided to USDA is actually a duplication of the data already provided to the citizens of Wisconsin.

- b) *The accuracy of the agency's estimate of burden of the proposed collection of information, including the validity of the methodology and assumptions that were used.*

Currently, it takes between six to eight hours a week to download and format the data WDPI provides to USDA. We usually start the first week of May and run through the first week of September for a total of 19 weeks. The bulk of the time is spent on formatting the data we collect to fit into USDA's template. This includes writing scripts to merge data from multiple fields into a single field to fit into the required template.

Our belief was that the data we were providing to USDA was being updated weekly based on the unique number we had assigned each site. It was in August 2018 that we were informed by USDA that the data was not being updated or merged based on the unique number and that as a result USDA was reporting Wisconsin sites with duplicate records containing slight differences based on a change to the data we were collecting and submitting. As a result, USDA's site provided data for Wisconsin that was in most cases confusing due to duplicate lines for single sites with no way to determine which was the most recent or correct.

c) Ways to enhance the quality, utility, and clarity of the information to be collected.

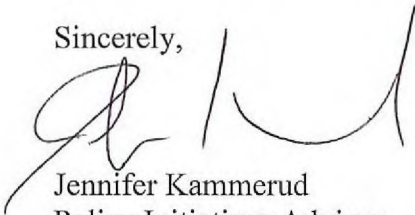
USDA should utilize the site's unique identifier as a way for the data to be updated each week with changes to provide accurate and current information.

d) Ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques of other forms of information technology.

Instead of trying to collect data for all states in a singular tool, duplicating work states have done and creating technical issues that would need to be bridged, we would prefer USDA to instead manage a web site where data already available to citizens in each state could be accessed. In our instance we would provide USDA with the link to the Wisconsin Summer Meals Map¹ to be made available as a link from their web site.

Thank you for the opportunity to comment. If you have any questions about these comments, please contact Brian Pahnke, Assistant State Superintendent, at brian.pahnke@dpi.wi.gov.

Sincerely,



Jennifer Kammerud
Policy Initiatives Advisor

JK:ac

¹¹ The summer meals map can be accessed at <https://batchgeo.com/map/f81ea4d2340b50c54fa55240aa6a910f> or from the WDPI web site at <https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>.