

September 21, 2006

SUBJECT: FSP – Implementation of New Racial/Ethnic Data Collection

TO: All Regional Directors
Food Stamp Program

Attached is a Q&A fact sheet that answers questions and provides further guidance on the new racial/ethnic data collection and the new FNS-101 reporting. The July 31, 2006, memorandum offers further policy guidance on this regulation.

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Attachment

Q&A on FSP New Racial/Ethnic Data Collection and Reporting on the New FNS-101 for FY 2007

I State Agency Data Collection

Q. 1. The guidance says applicants must be offered the five races and that applicants may choose one or more races under the new data collection. May an applicant choose all 5 races?

A. An applicant may choose one or more races and may choose all races that apply. A client may choose all 5 races to fully identify his or her heritage if that reflects their background. The data collector may not “second guess,” or in any other way change or challenge a self-declaration made by the applicant as to his or her race or ethnic background unless such declarations are patently false. The applicant’s selections would be stored in the State agency’s database. The State agency must be able to compile and maintain data by project area for ALL racial/ethnic categories and combinations and keep the compiled data in easily retrievable form for FNS review.

Q.2. It appears that an individual may select Hispanic/Latino ethnicity and no race. Is this correct?

A. While an individual of Hispanic/Latino ethnicity should answer both questions, an individual may choose to answer just one of the two racial/ethnic questions. In such a case, the caseworker should gently encourage them to answer both questions. If an applicant selects Hispanic/Latino ethnicity and no race, the caseworker must record the race based on visual observation of the applicant. If an applicant selects a race but no ethnicity, the caseworker must record the ethnicity based on visual observation and first and/or last name of the client. In the case of a telephone interview, if the applicant does not provide race and/or ethnicity, the caseworker should leave any unanswered race or ethnicity field blank.

II FNS-101 Reporting

Q. 1. The FNS-101 lists 4 racial combinations for reporting. How would the State agency report an applicant who chose all 5 races or any other combination not included in the four combinations listed on the FNS-101?

A. The form FNS-101 has line items 11 through 14 for the four most common racial combinations based on Census data plus line item 15 for the remaining balance of household contacts reporting more than one race. Item 15 is for the count of those household contacts that chose racial combinations that *are not included* in items 11 through 14. For example, the State agency would include in item 15 of the form the household contact that chose any combination other than those listed in items 11 through 14, including the count of household contacts that chose 5 races.

Q 2. If the State agency implements the new data collection on April 1, 2007, it will have 4 months data under the new data collection by the time of the July 2007 report month. May it report only the data gathered under the new data collection, reporting just 4 months of data?

A. No, the State agency must report on the FNS-101 the number of all household contacts who are participating in July 2007 by race and ethnicity. The State agency, just as it has had in the past, will still have or should be able to still get from its information system data on households who applied under the old data collection method and who are still participating. The State agency must combine the two counts (under both the old and new data collection) for FNS-101 reporting to get as complete a count as possible of household contacts by race and ethnicity for July 2007.

Q. 3. How is the State agency to break down the racial data collected under the old method to put it on the new form and new categories?

A. FNS recognizes that FY 2007 is a transition year to the new reporting since State agencies will have data under both the new and old data collection. In general, household contacts that chose a single race under the old data collection method would still be reported under that same race on the new FNS-101. However, special procedures will be necessary for certain categories due to the mixed data and changes in the categories. The old category of “Asian or Pacific Islander” has been divided into two new separate categories (i.e., “Asian” or “*Native Hawaiian or Other Pacific Islander*”) on the new FNS-101. Accordingly, as explained in the July 31, 2006 guidance, State agencies are to reassign any remaining household contacts who chose “Asian or Pacific Islander” under the old data collection into the larger of the two new separate Asian and Pacific Islander categories on the new FNS-101 using the State’s population data from Census 2000 that was attached to the guidance. For example, if the Asian population in the State is larger than the Native Hawaiian or Other Pacific Islander population in the State, any remaining household contacts who chose “Asian or Pacific Islander” under the old category would be reported under the new “Asian” category. Household contacts of Hispanic origin who did not select a race under the old data collection method will be reported in the remarks block. See question 4 below for further information on reporting for individuals of Hispanic origin.

Q. 4. The new FNS-101 asks for the number of household contacts of Hispanic origin by race in column B. Where is the State agency to report on the FNS-101 the ethnic data collected under the old or new method for household contacts of Hispanic origin who did not choose a race?

A. The State agency is to report in column B the number of household contacts of Hispanic origin by race based on the new data collection. The State agency is to report the count of household contacts of Hispanic origin that did not choose a race (under the old or new method) and visual observation was not possible in the remarks block on the FNS-101 for each project area. This will allow a complete count for each project area. We also ask the State agency to provide as an explanatory note with their submission the

Statewide count of household contacts of Hispanic origin that did not choose a race and were not observed. State agencies who report the FNS-101 electronically into the Food Programs Reporting System (FPRS) are to report this data by project area in the 30-character remarks block provided for each project area (e.g., Hispanics of no race 1,000,000) and report the Statewide figure in the Statewide remarks block.

Q.5. The new FNS-101 reports the race and ethnicity for the household contacts, not for all household members. This may not reflect the racial and ethnic status of everyone in the entire household. Should States report for all participants on the FNS-101?

A. The old FNS-101 also reported data on household contacts (one per household), not each participant. We have encouraged State agencies to collect racial/ethnic data on all household members. We understand that the reported data on the household contact will be of limited use for household composition. However, after careful consideration, for FNS-101 reporting, States are to continue the current practice to report for the household contact. We note that the household contact is the one who is interviewed by the caseworker. Also, not all household members are required to be present at the interview.