

## Appendix II. Public Comment #1

# PUBLIC SUBMISSION

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**Docket:** FNS-2022-0017

Agency Information Collection Activities: Proposed Collection; Comment Request-Supplemental Nutrition Assistance Program Education and Obesity Prevention Grant (SNAP-Ed) National Program Evaluation and Reporting System (N-PEARS)

**Comment On:** FNS-2022-0017-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program Education and Obesity Prevention Grant National Program Evaluation and Reporting System

**Document:** FNS-2022-0017-0084

Comment on FR Doc # 2022-12504

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## Submitter Information

**Email:** cgreen@aphsa.org

**Organization:** American Public Human Services Association

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## General Comment

Attached please find a comment from the American Public Human Services Association. Thank you for your consideration.

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## Attachments

APHSA\_Letter\_SNAP-Ed NPEARS



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August 9, 2022

Maribelle Balbes  
United States Department of Agriculture  
Food and Nutrition Service  
1320 Braddock Place, 5th Floor, Alexandria, VA 22314

RE: Supplemental Nutrition Assistance Program Education and Obesity Prevention Grant (SNAP-Ed) National Program Evaluation and Reporting System (N-PEARS), 87 FR 35491

Dear Ms. Balbes,

As the bipartisan, national membership association representing state and local health and human services agencies, we are committed to building the field capacity of our members in programs such as SNAP-Ed to meet their desired outcomes of health and well-being for their communities. As the field continues to modernize and foster innovative methods to better serve clients, the tools that agencies are equipped with must also be able to adapt to the local and unique needs of each state and its constituents. The SNAP-Ed program has significant flexibility in the activities that the state can operate and how they partner with implementing agencies and other local and community partners. This has given each state the bandwidth to develop a program that works for them and their communities. The development of the National Program Evaluating and Reporting System (N-PEARS), as directed by the 2018 Farm Bill, will create a universal system for all states to upload their annual plans and narrative reports to the FNS national office. For many states that have already used PEARS, this transition will be relatively smooth, but for others that have not used the system and are accustomed to their own reporting methods, this transition will be more challenging. As we look toward the future of SNAP-Ed, the development of N-PEARS will provide welcomed modernization to the program. To ensure that it contributes positively to the mission of SNAP-Ed, the new system must be centered in the need for equitable outcomes through both partnerships across states and implementing agencies as well as for the end-user client.

#### **Understanding the Need & Opportunities for Impact Across States**

As FNS continues to develop N-PEARS and consult with state agencies on the system modernization, there must be a balance of both streamlining requirements and recognizing the downstream impacts to communities that the program serves across the country. The N-PEARS method of reporting will now require that each state submit their own needs assessment, whereas in the previous method for reporting many states worked with their implementing agencies or tribal organizations to submit unique needs assessment for the community that they serve. While having one needs assessment done at the state-level serves a unique purpose and use for the state and federal agency, it cannot fully encapsulate the needs of each SNAP-Ed audience within the state. The needs of communities across one state can also vary widely from urban to rural to tribal land, and the true need and data to reflect it is often better known by local community partners, such as the tribal nation itself. Instead of focusing solely on the statewide needs assessment being done by the state agency, FNS should encourage states to accept needs assessments from their implementing agencies and other partners such as tribal organizations through N-PEARS. By having and encouraging both the statewide needs assessment and continuing to partner and receive needs assessments from the implementing agencies, the expertise from both partners can be leveraged. This would

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support both the capacity at the state level as well as generate a more comprehensive understanding of the real needs of communities across their state, especially those who already face disproportionately high structural and systemic barriers to accessing programs such as SNAP.

In addition to conducting the statewide needs assessment, N-PEARS may also require states to shift how they have been able to collect information from their partners in the past. While each state collects reports in accordance with the SNAP-Ed guidance, the templates provide states with flexibilities to shift questions or add additional questions to help guide their administration of the program. This flexibility has allowed state agencies to uniquely capture work that is being done in their state that may not be accurately measured through the N-PEARS system, such as activities that are not typically asked about. In order to retain this critical flexibility and support states in their information gathering, FNS should include “Other” boxes in N-PEARS, and work with states throughout their first year of submission in the portal to ensure that they feel their information is adequately captured.

### **Understanding State Capacity**

While the long-term hope for N-PEARS is to create a more efficient reporting process for state agencies and their partners by reducing administrative burden, the realities of the effects of these changes will vary across the country and in each unique SNAP-Ed program. State agencies have a wide variety in levels of staff support for SNAP-Ed programs, ranging from just 10% of a Full-Time Employee (FTE) to multiple FTEs dedicated to the program. Due to this variability, over the next year as states gear up for the transition to N-PEARS, it will be critical for FNS to work with states to provide both technical assistance to states – especially those who haven’t previously used PEARS, and flexibility for states on their timelines for onboarding to the new system and shifting from their current reporting methods. This ability to work directly with states and the understanding of the shifts that are needed to take place will have immense impact on the long-term success of both N-PEARS and the entire SNAP-Ed program.

The development of N-PEARS shows significant promise and investment in the continuing growth of SNAP-Ed and its utility to communities in making healthy and desirable choices. To ensure that the system rollout meets its full potential and works toward the overall mission of fostering well-being, FNS must continue to work directly with states to understand their needs for flexibility and capacity support. We look forward to working together to build a growing SNAP-Ed program. Please reach out to Chloe Green at [cgreen@aphsa.org](mailto:cgreen@aphsa.org) with any questions or opportunities for further collaboration.

Sincerely,

**Chloe Green**



Policy Associate, Food and Nutrition Services  
American Public Human Services Association

**Belit Burke**



Chair  
American Association of SNAP Directors