

Appendix I3. Public Comment #2

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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

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Comment on FR Doc # 2022-12504

Submitter Information

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General Comment

Dear Ms. Balbes:

The Association of SNAP Nutrition Education Administrators (ASNNA) appreciates the opportunity to respond to the call for public comment on the proposed new N-PEARS e-system developed for Supplemental Nutrition Assistance Program Education (SNAP-Ed) program planning and reporting.

Please see the attached comment letter and enclosures:

ASNNA Federal Register Comment Letter 8.9.22

ASNNA Findings and Recommendations

ASNNA's Consolidated e-System Review

ASNNA Position Paper - 2018 Farm Bill

Respectfully,
ASNNA Leadership Team on behalf of ASNNA membership

Attachments

ASNNA Federal Register Comment Letter 8.9.22

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August 9, 2022

Maribelle Balbes
Food and Nutrition Service
U.S. Department of Agriculture
Supplemental Nutrition Assistance Program
1320 Braddock Place, 5th Floor
Alexandria, VA 22314

Dear Ms. Balbes:

The Association of SNAP Nutrition Education Administrators (ASNNA) appreciates the opportunity to respond to the call for public comment on the proposed new N-PEARS e-system developed for Supplemental Nutrition Assistance Program Education (SNAP-Ed) program planning and reporting.

ASNNA was established in the late 1990s as the all-volunteer national member organization representing leaders who run SNAP-Ed programs. Now established as a non-profit, our 121 member organizations come from almost all 50 states, the District of Columbia, and the Territory of Guam. ASNNA's member organizations are among the 53 SNAP State Agencies (SA) and 168 diverse State Implementing Agencies (SIA) that administer SNAP-Ed in all regions of the country and across institutional types: 1864 and 1890 Land Grant University (LGU) cooperative extensions, other universities, state health departments, other state departments, non-profits, Tribal-serving organizations, and local governments. ASNNA is committed to continually strengthening the program to better serve the estimated 90 million people who are eligible for SNAP-Ed. By statute, these are people who may qualify for other federal nutrition assistance programs, not solely SNAP, and individuals in communities with a significant low-income population.

SNAP-Ed is the country's largest, most flexible, diverse, and responsive federal community nutrition education and promotion program; it focuses exclusively on low-resource communities where disparities are high. As such, SNAP-Ed is key to achieving the country's new food and nutrition security goals. A strength of SNAP-Ed is its comprehensive, flexible, multi-level public health approach that combines a mix of direct education; policy, systems, and environmental change; social marketing; and multi-sector collaboration strategies. We use evidence-based nutrition education interventions when available and develop new ones when they are not. The blend is designed to complement and capitalize on other resources to maximize the SNAP-Ed investment and better meet statewide and local needs. A unique strength is that SNAP SAs in state social services agencies contract with diverse organizations, known as SIAs, that have staff with the expertise, partnerships, organizational position, and resources to support a variety of statewide and community initiatives. Some SIAs also fund Local Implementing Agencies (LIA). SAs and SIAs may each fund other contractors for different functions such as evaluation, training, or marketing. This complex network of organizations works together and with its partners to anticipate and respond to state and community needs.

ASNNA and its committees are structured around supporting the success of SNAP-Ed, working in collaboration with the USDA Food and Nutrition Service (FNS). Since forming in 2012, the ASNNA Evaluation Committee has engaged SNAP-Ed practitioners and worked cooperatively with USDA to

deliver on the statutory mandates of the 2010 Healthy, Hunger-Free Kids Act and the 2018 Farm Bill. We have driven development of and/or provided technical assistance on development and implementation of the *SNAP-Ed Evaluation Framework* and its companion *Interpretive Guide* (2016), multiple editions of the *SNAP-Ed Toolkit*, and three national censuses to monitor uptake of the *Framework*. We support a half dozen technical teams that meet monthly to focus on retrieving results from SNAP-Ed activities conducted at different levels of the *Framework*. Most recently we began an ASNNA-wide effort to comprehensively update the *Framework* based on our first 6 years of state-level experience. Our position paper, *Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill* (2020), exclusively addresses the new e-reporting requirements. Some of our work products are found on the evaluation section of our website ([link: https://asnna.us.org](https://asnna.us.org)). ASNNA's allegiance to evidence-based interventions and best-practices are a foundation that ensures the success of the program. Our Race, Health, and Social Equity Committee and Social Marketing Committee each have collaborated to work with USDA on peer-led guidance to the field on these topics.

An analysis of SNAP-Ed Annual Reports done in 2018 on behalf of FNS found that there were over 2,500 evaluation reports submitted over 3 years, so it is essential that any future e-system accurately capture and aggregate them. From a national perspective, the new e-system must be designed to lift up the positive changes occurring among individuals, organizations, and low-income communities participating in SNAP-Ed. SNAP-Ed policy goals that are critical for the nation and states to capture include, but are not limited to, fruits and vegetables, other healthy foods, sugary foods and beverages, food security, physical activity, and ways to show how SNAP-Ed can help leverage the collective impact of USDA programs and engage SNAP-Ed's estimated 30,000 organizational partners in positive change in low-resource settings. A full set of priority outcomes, including selected social determinants of health, is found in the *SNAP-Ed Evaluation Framework* (2016).

SNAP-Ed operates under the mandates in the 2018 Farm Bill, with an anticipated new Farm Bill coming in 2023. The 2018 Farm Bill provided multiple requirements for FNS and SNAP-Ed state agencies:

- states must use an electronic reporting system to evaluate projects and administrative costs;
- USDA must establish an online clearinghouse of appropriate interventions for target populations;
- USDA must provide technical assistance to States in the development and implementation of state SNAP-Ed plans;
- state agencies must submit annual reports that can be publicly available that include the use of funds, project descriptions and "a comprehensive analysis of the impacts and outcomes," and the status of multiyear projects; and
- FNS, in consultation with the National Institute of Food and Agriculture, must submit annual reports to the House and Senate Agriculture Committees highlighting coordination between USDA nutrition education programs and the use of funds.

We share USDA's feeling of urgency to have the new State Plan (SP) and Annual Report (AR) e-systems required by the 2018 Farm Bill in place, at least in a pilot stage, before the 2023 Farm Bill. As part of the national SNAP-Ed team, we too need to be well-positioned to showcase progress since 2018. We need to lift up SNAP-Ed impacts with key stakeholders and show that our efforts are responding to the Government Accountability Office, Congress, and other stakeholders who want USDA to develop stronger internal infrastructure, especially related to coordination, shared expertise, and public/private efforts. ASNNA is committed to these goals, and we have worked to build capacity in this flexible, responsive state program to plan for and report on the wide range of benefits it generates.

However, our review of documents in the June 10, 2022 *Federal Register* has concluded that moving forward with implementation of the proposed N-PEARS e-system starting in October 2022 (by building toward the FFY 2023 Annual Report) is premature, thereby potentially threatening the success of the entire e-system. We have found that the amount of information that the proposed N-PEARS e-system asks for in the nearly 400-page proposal is excessive; the role delineation between SAs and SIAs is not consistent with long-term, successful practice; formatting and data management among sections and between the SP and the AR are still very much a work-in-progress. N-PEARS is based in part on the existing Education and Administrative Reporting System (EARS), which has not generated needed program reports; there is no information indicating what outputs the system will generate with the massive amount of new information that would be collected. It clearly is not ready for implementation on October 1, 2022, as proposed. Additional time is required for an open, transparent process that can fully vet recommendations about the proposed e-system, secure full participation in revising it and establish consensus about priority informational needs, then conduct pilot tests and smaller demonstration projects prior to full-scale implementation. The contractor that informed some of the pilot work in 2020 echoed these recommendations and, importantly, recommended a 3-5 year pilot in their report to FNS.

Recognizing the need to tell a national story, ASNNA formed a team of members to review the proposed e-forms using their content expertise and experience with SNAP-Ed planning, implementation, and reporting. The team is a cross-section of 17 members from 6 of the 7 Food and Nutrition Service regions; 14 states; 8 Land Grant Universities (LGUs); 3 other institutions of higher education; 2 nonprofits; 2 state government agencies; and ASNNA's 4 standing committees. Please note that ASNNA members participated in this review as members of ASNNA, and their views may not directly reflect the views of their employers. In the very short time available, we did our best to understand the design, the interplay of its components, and how such a novel, complex system would work for our members as they run diverse SNAP-Ed programs across the country. We carefully reviewed the 260-page wireframe, the 85-page draft of instructions, and a multi-tabbed estimate of burden worksheet for completing the SP and AR. Enclosed are two summaries of their work over the past 6 weeks. *ASNNA Findings and Recommendations Responding to the 4 Questions in the Federal Register* and *ASNNA's Consolidated e-System Review, Summer 2022* delineate our team's preliminary findings, concerns, and recommendations. They, along with team discussions and ASNNA's 2020 position paper, *Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill*, form the basis for the conclusions and recommendations that follow.

In response to the 2018 statutes, we appreciate the efforts that the Food and Nutrition Service has taken to build a new pilot electronic SNAP-Ed plan and reporting system, but we are concerned that the proposed system does not sufficiently support the USDA's mandates outlined in the 2018 Farm Bill or states' needs for an efficient, illuminating reporting system. We recognize that FNS also serves as a champion of SNAP-Ed, providing us the tools we need to do good work on behalf of the agency and the public. Unfortunately, the proposed forms do not capture the needs of states for a flexible, responsive, dynamic, and practical SNAP-Ed reporting system.

Our team of ASNNA representatives has concluded that the proposed new e-system is not yet well aligned with real-world SNAP-Ed implementation and, as designed, would negatively affect the program's ability to continue delivering results. We therefore strongly recommend a more structured and inclusive development timeline that has rigorous benchmarks be substituted for the proposed implementation date of October 1, 2022.

The comments below reflect what a representative team of ASNNA members was able to conclude, at a high level, about the four response categories in the *Federal Register* as well as the value of the proposed e-system as a tool for FNS and the public to visualize SNAP-Ed outcomes. The timing, size of the package, and complexity of the proposed e-system prevented many states and agencies from participating in the review and should not be viewed as either disinterest or support for the proposed e-system. Further, it is impossible to understand and comment on the full impact without experiencing the proposed e-system, which was not possible because of the truncated timeline and limited access. This letter includes a summary of basic recommendations for moving forward with further design, development, pilot testing, and process evaluation of the proposed e-system in support of successful introduction and implementation in the future. We offer suggestions for what the development timeline should include.

(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.

Lacking proper formative research and process testing, the promise of this system will not be reached and, thus, will lack practical utility in the long-term for FNS. The proposed e-system has neither incorporated sufficient input from critical stakeholders, including SNAP-Ed practitioners and the communities and people we serve, nor undergone the testing necessary to assure it will fulfill its purpose as it is currently designed.

From the perspective of this team of experts, many data points that are requested in the SP and AR seem excessive and beyond the scope of the program's impacts and outcomes. The practical utility of the level of minutia created by the proposed e-system is not apparent given that no dashboard or reporting outputs have been incorporated, even though the reporting of outcomes is one of the key reasons to develop this system. FNS should work with states to prioritize the key information essential for fiscal integrity and reporting on high level outcomes and results, as outlined in the 2018 Farm Bill. Without this step, it will be difficult for SNAP-Ed agencies to decipher and prioritize what needs to be aggregated and evaluated. With implementation of the AR proposed to begin on October 1, 2022, and unclear priorities, states have inadequate time to update processes for collecting indicator data as outlined by this proposal. Once the priority endpoints are clear, time is required to select validated instruments, or develop new ones, and train staff. Otherwise, the data will be of unknown accuracy and questionable usability. Apart from the formal reporting system, states and communities can capture the level of detail needed to develop and maintain meaningful programming.

The detailed fiscal breakdown of all program elements, including costs by artificially-defined "projects", does not align with real-world implementation. State plans are written up to 8 months ahead of implementation which precludes the ability to offer precision in this exercise and predicts a certain cascade of administratively burdensome amendments and internal tracking systems that are not necessarily aligned with state or organization tracking systems. The minutiae of costs and program elements that are proposed to be tracked do not enhance program performance or efficiency. In the enclosed *ASNNA Findings and Recommendations Responding to the 4 Questions in the Federal Register* document, there are multiple examples of excessive data collection in the proposed e-system, which we could help FNS resolve with further discussion about, development, and testing of the system.

In addition, evaluation options exclude techniques needed to gather insights from the SNAP-Ed audience, especially segments that are often underserved. Knowing that equity is a priority for the USDA, SNAP-Ed must have the flexibility to adjust programming and evaluations to best suit the audience and provide SNAP-Ed participants the opportunity to share their voices. Searching for utility at

the expense of equity contradicts the USDA's commitment to ensuring no USDA "customers are ignored or left behind" (link: <https://www.usda.gov/equity-commission>) and perpetuates the inequity of regressing to the mean, thereby muddling diversity and reverting to times of token inclusion.

Full-circle testing of the proposed forms with constructive feedback loops is necessary to properly design any e-system. The new timeline should provide time for SAs and SIAs to pilot elements of the proposed e-system after further development and ahead of the next Farm Bill in 2023 or 2024, well before FNS finalizes it for field testing. Then, further testing would let SNAP-Ed agencies and FNS work together to identify the strengths and weaknesses of the proposed forms. This will provide time to clarify terms, models, and output reports for the system, make additional adjustments, and ensure that resources are not wasted due to an under-tested system. This process will also safeguard the agency's commitment to equity.

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

The accuracy of the estimated time burden is difficult to assess because the methodology to develop the base number of hours for each activity for each agency type was not included in the *SNAP-Ed N-PEARS_BurdenTbl*. We understand that only five to seven out of the 168 SIAs are in the process of testing the proposed e-system to provide the basis of the national time burden assessment, meaning that the burden of real-world use has not been incorporated. Taking the time to fully test the e-system and talking with testers about their experience using the forms is needed to enhance the accuracy of the estimated time burden.

According to the table, there is an assumption that technical staff will complete most of the SP and AR, with managerial staff completing only the staffing and budget portions. Experience shows that technical staff are not always the ones compiling the documents. The salaries for nonprofit respondents, while sourced from the Bureau of Labor Statistics, do not align with known salary ranges for nonprofits delivering SNAP-Ed, which function to retain highly qualified personnel. Further, there are missing levels of staff, per federal classification, who are often involved in plan and report completion (e.g., evaluators who are classified as scientists). These assumptions skew the labor hours per staff classification and impact respondent costs, likely making them lower than they actually are. The staff classifications need to be built out and more accurately reflect the realities of who is completing the plan and report.

The estimate of burden is also examined based on agency type and large vs. small Implementing Agencies. Regardless of agency type or size (the definition of which is not standardized), all of the same information collection and entry will need to be completed (i.e., address all of the same sections). Without real-world testing, it is unknown whether it will take some agency types (or sizes) fewer or more hours. This, again, underscores the importance of testing the proposed e-system with implementers, gathering their feedback, and then developing a solid estimate of the burden for completion.

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

Given the time allotted for review and comment, ways to enhance the quality, utility, and clarity of information to be collected is too broad a topic and can only be addressed superficially here. If the proposed e-system is an effort to collect information appropriate for federal assurance of SNAP-Ed accountability, then the approach must include testing and input from state partners who also are responsible for SNAP-Ed, rather than solely a top-down approach. Many ASNNA members who are part

of this *Federal Register* review team also participated as invited participants in the Technical Working Groups and Steering Committee to provide input into ways to enhance quality, utility, and clarity of information collected through an e-system. Upon review, however, the feedback and guidance provided by these SNAP-Ed practitioners seem only tangentially reflected in the proposed forms. What was shared for public comment does not fully align with the tone of the discussions and conclusions formed in the working groups.

Looking at the proposed SP and AR documents, we reason that ways to enhance quality, utility, and clarity of the information to be collected should start with attention to SA capacity for, experience with, interest in, and even appropriateness of completing meaningful needs assessments and action plans. SAs run many large, visible, demanding and often-controversial social programs, including SNAP, so simultaneous participation by, or delegation to, the SAs that are responsible for delivering and evaluating SNAP-Ed is essential. Needs assessments directly inform programming and subsequent outcomes. In communicating with SAs across the country, it is evident that many SAs rely on SAs to complete needs assessments, identify priority areas, and develop objectives.

The proposed SNAP-Ed SP calls for SAs to take the lead in these areas, while only encouraging collaboration with SAs. In practice, instead of lifting up collaboration, there is potential for further isolation among entities doing SNAP-Ed work. If an option is for SAs to hire consultants, the quality and clarity of information collected becomes more questionable. Consultants may not have awareness of or experience with delivering SNAP-Ed in a given state, nor would they know details of information needed for working with partners to identify priority areas, choose practical performance indicators, or set realistic objectives. Experts experienced in these areas exist within the SAs. Regardless of the decisions as to how to increase engagement of SAs about the needs within their states, acquisition of new skills in developing needs assessments and how to apply them need a “learning on-ramp” longer than 3 months and utilization of principles of adult learning.

Another priority issue to lift up is that the proposed e-system includes a narrow scope of the types of information that can be included. The focus on the methods to standardize the data collected in the SP and AR perpetuates systematic hierarchical processes that are deleterious to community-based and participant-informed work. As SNAP-Ed matures, a mixed-method approach has become increasingly essential. The proposed e-system and associated instructions do not appear to encompass the diversity of longer-term SNAP-Ed programming with increasingly engaged community members and partner organizations, nor the different audiences and stakeholder groups with which SNAP-Ed works, thus perpetuating inequities in implementation. Priority areas, indicators, and SMART objectives in the proposed e-system appear to be developed prior to SIA involvement, which excludes not only the practitioners but also organizations that plan and deliver programs at the grassroots level.

SNAP-Ed’s strength is its diverse implementation model and programming rooted in community-based information that situate program development, delivery, and evaluation in ways to be acceptable and effective for communities. SNAP-Ed programming is not static; modification in delivery and evaluation occurs as work is conducted all year long. Adaptation and development of new efforts occur in response to experience on the ground. FNS must encourage and support maximum flexibility for states to identify and respond to community needs through qualitative data and mixed methods approaches. In addition, the proposed e-system appears to focus on a deficit-based approach to assessing community and population needs. Instead, an asset-based perspective to assessing needs that builds on knowledge of community strengths while addressing identified needs is essential. It is time for a paradigm shift, deficit- to asset-based, in how we approach needs assessments to ensure that equity is centered as part of this effort.

Relative to the quality of the information collected, in a world where digital media is ubiquitous and in a program with strategies that are designed to touch all levels of the social ecological model – individuals, organizations, mass communications, and through partner organizations that convey messaging, modify the environments in which people make healthy choices, and otherwise adapt their own systems to support health – the concept of unduplicated reach needs to be revisited. Best-practices in empowering behavior change include using multiple modalities to generate the most exposure possible to relevant, actionable messages and to new environmental conditions that make healthy choices the easiest, most accessible, and affordable in locations where behavioral decisions are made.

(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 or other forms of information technology.

In the proposed e-system timeline, there is a very high burden of manual data entry for the 2023 AR. Being required to use the proposed AR form for FY 2023 reporting when FY 2023 SPs are not in the proposed e-system means all of the information will need to be manually collected and inputted. As described above, with the forms themselves being unclear and still in flux, this will result in wasted effort and has questionable value in producing good information for the nation. This adds another reason to delay the start of the new e-system until it has been fully tested and each state is able to complete the SP with a well-developed, user-informed e-system.

To start, all of the information input into the SP will need to be manually entered and only some of that information will be auto-populated into the AR. Streamlining data and information collection by providing features to link to, upload, or auto-populate data from national and in-state sources are needed. Creating an application programming interface (API) that connects with state-level data collection systems such as PEARS, excel spreadsheets, accounting programs, software systems, and other automated management tools is essential to reduce the burden of data entry and analysis.

There are also multiple layers of information collection and entry into the proposed e-system. Some sections are to be completed by the SA, but will still require input from SIAs. Thus, introducing a needlessly iterative process for collecting and sharing the information increases the likelihood of errors in data entry and further increases the burden of data collection, synthesis, and entry. Providing simultaneous access by SIAs to all sections of the SP and AR is needed to streamline information collection and provide for efficient data entry and analysis.

The definition of project “as a set of activities or interventions executed by a single agency with common goals, intended outcomes, target audience, and implementation setting” is extremely problematic. This definition is neither realistic, practical, nor aligned with the coordinated implementation of SNAP-Ed activities among SAs, SIAs, and even nationally. For states with numerous projects, sometimes upwards of 75 projects or more, entering planned activities for each project and then having to report at both the project and site level introduces duplication and increases the burden of data collection and entry. The intent should be to plan for projects that accomplish *SNAP-Ed Evaluation Framework* outcomes and then to be able to report and aggregate those outcomes to show program impact.

Defining the term ‘project’ more in line with current practice will help address the problems identified by the proposed definition. The ASNNA Position Paper provided the recommendation to “Define the term ‘projects’ at the state-level as clusters of interventions [direct education, PSE, social marketing] with common themes that reflect the integration of complementary, multi-level approaches and partnerships.” These would be designed to achieve results in the *SNAP-Ed Framework* and other state

priorities, and projects may be conducted independently or cooperatively by any combination of SAs, SIAs, LIAs or other contractors. This will corral the number of projects to manageable, aggregable groups for national reporting purposes without losing the richness and innovation of the multifaceted SNAP-Ed approach described in the *SNAP-Ed Evaluation Framework and Interpretive Guide*.

The work SNAP-Ed practitioners do is rooted in community needs, thus projects evolve over time, introducing new components to respond to changing needs as informed by process evaluation, essentially updating projects every year. This means ongoing projects will need to add new components, thus not being able to take advantage of features to auto-populate from the previous year. This will increase the burden of data entry. To minimize this, it is important to have electronic features that can update the projects with new components without needing to re-enter each as a new project every year.

Finally, the current structure of the e-system duplicates information being collected for state and federal purposes. Without auto-population features and software that allow data transfer between the state and federal systems, data/information needed for federal reporting and in-state purposes must be re-entered into one or the other of the systems. Other examples of duplication include needing to enter the level of evidence for an intervention multiple times, if that intervention is being used with more than one project, and duplication of information entry for systems-level changes that affect multiple sites. Again, having auto-population and API features as part of the e-system will reduce duplication in information entry in addition to eliminating the possibility of errors due to manual entry of secondary data.

Some specific recommendations for technical improvement are provided in section 4 of the ASNNA *Findings and Recommendations Responding to the 4 Questions in the Federal Register* (enclosed). They include, but are not limited to, USDA and ASNNA working together to:

- Develop a customized, pre-populated needs assessment template that includes national statistics from reputable public and private sources provided at the lowest geographic level, such as census tract, zip code, or county, and that can upload data from in-state sources such as surveys, reports, and reporting systems;
- Design the e-system so it can provide reports back to states for in-state management and reporting to partners; and
- Conduct inclusive, transparent demonstration and pilot projects iteratively to test informational outputs (tables, graphics, 508 compliance, *Framework* indicators, and other analyses and depictions) with collective decision making processes before formal field testing and nationwide roll-out.

In summary, our comments and accompanying documents are preliminary and represent what ASNNA members have seen and experienced so far with the proposed e-system, mostly as a graphic representation, during this very limited time frame for review. In its current iteration, there is no noticeable added value with the data that can be extracted to inform programming or be shared with communities served through SNAP-Ed. More minutia collected in the proposed e-system does not automatically result in robust storytelling nor equal easier packaging and dissemination of SNAP-Ed impact. The proposed e-system will not yet support the function of aggregating data while providing a comprehensive analysis of the program's impacts and outcomes as intended. Having contractors who say "we will do that in the future", which is the current situation, directly calls for the nascent e-system to be a pilot.

Crucial steps have seemingly been skipped or minimized, and feedback from the groups convened so far seem to be working in isolation and at cross purposes. Designing any new system from start to finish should be transparent, iterative, and collaborative with stakeholders at all levels. An equitable process is necessary to develop a new system where stakeholders and potential users have access to shared information and where conclusions developed and decisions made are explained and justified. This approach increases the likelihood that the resulting system will integrate equity in planning and reporting that promotes diversity and inclusion. While ASNNA appreciates the focus on equity in the USDA's actions on nutrition security and in SNAP-Ed, the new proposed plan and e-reporting system do not align with this initiative because it limits community-centered solutions and evaluation. The participants in SNAP-Ed are not research subjects. Our goal is to evaluate our effectiveness in empowering participants to make healthy choices and helping enable communities to support such choices.

Of key importance is to recognize that the currently proposed nascent e-system will not realize the potential of a fully developed system in time to inform the next Farm bill. Considering where we are in the timeline of the 2018 mandate, we recommend describing to Congress that this public comment period revealed many new requirements in the field and thus the necessity of an extended 3-5 year pilot phase with demonstration projects to further engage expert stakeholders to tell the story of this uniquely impactful program. Work to-date on the proposed e-system begins the process of meeting the progressive requirements of the 2018 Farm Bill. We must use the remaining period ahead of the 2023 Farm Bill to initiate sound process evaluation to progress development of the proposed e-system to meet user needs at state and national levels. Our strong recommendation is, through formal pilot tests and demonstration projects, to redefine the steps and timelines needed to successfully stand up a forward-thinking, flexible e-system that better aligns with how the program is implemented, recognizing the diverse models of implementation and meeting the needs of very diverse stakeholders. Diversity is our strength.

Sharing the story of SNAP-Ed impact is essential. There are currently no known dashboards or other stakeholder-friendly outputs that provide effective tools for FNS, Congress, and the public to visualize and understand SNAP-Ed outcomes. ASNNA whole-heartedly embraces the promise of a cutting-edge reporting system that both informs program growth and shares program impact with all stakeholders. Issues in the proposed e-system can be mitigated. This e-project can evolve to reach its potential. It is not there yet. ASNNA members are ready to engage with our respected federal colleagues in a sound, transparent process to grow an e-system that tells all stakeholders that SNAP-Ed works.

Respectfully submitted,

ASNNA membership as represented by:

Leadership Team
Advocacy Committee
Evaluation Committee
Finance Committee
Race, Health, and Social Equity Committee
Social Marketing Committee

Enclosures:

- *ASNNA Findings and Recommendations Responding to the 4 Questions in the Federal Register*
- *ASNNA's Consolidated e-System Review, Summer 2022*
- *Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill: A Position Paper of the Association of SNAP Nutrition Education Administrators (ASNNA)*

ASNNA Findings and Recommendations Responding to 4 Questions in the

Federal Register of June 9, 2022

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

Question 1. Is the information collected necessary for the proper performance [of the SNAP-Ed system], and does it have practical utility? Is it impractical/wasteful?

(Note: Reasons for requiring information and how it would be used or reported out to the public or to states were not provided; nor was there any information indicating states could access and use the information for their own management purposes. This could double the workload needed for state-specific management functions.)

- The needs assessment requires a large amount of data that will not be used in developing the State Plan (SP) – disease rates, 26 languages, very detailed demographics, info by county. This new workload would divert resources from program delivery to administration.
- SNAP State Agencies (SAs) are not staffed to complete needs assessments, yet only they have access to the needs assessment and action plan; State Implementing Agencies (SIAs) must do needs assessments themselves for planning, implementing, monitoring/evaluating their interventions.
- There is added work required to produce both an Action Plan and multiple ‘projects’.
- The new definition of ‘project’ as being activities conducted by only 1 SA or SIA is not how states approach their work, and costing out staff and resources/‘project’ has no practical value. SNAP-Ed staff work on multiple projects at the same time, materials are shared, and support costs like space or travel are not itemized separately; SAs and SIAs often collaborate. This would be a new, high workload with no added value to states.
- Unnecessary workload and disruptive for FNS to approve all adaptations of all interventions.
- States do not know (or need to know) the number of sites/setting type at time of plan—why divert resources to estimate and collect it?
- Types of evaluation are inadequate; qualitative and mixed-methods are mainstays of responsive, multi-level, and large-scale programs, but they are not included.
- With as many as 30,000 partners, it is not practical to develop and retain coordination and collaboration agreements.
- If the Annual Report (AR) using the proposed format is required for FY 2023, then data collection must start on October 1, 2022, even though problems with the proposed template and forms are still being identified. Later in FY 2023, back-estimating

data from October 2022 will be problematic and a new, high workload. Data in the 2023 AR would be largely unusable at national level.

- Unlike the present SNAP-Ed system, there is no apparent way for states to use N-PEARS to produce in-state reports or program management systems.
- The Executive Summary (ES) is a critical work product for the public and Congress, but the word limit is too low and does not provide adequate info about year's results.
- For policy, systems, and environmental (PSE) changes, 1 row/site x 43 setting types is excessive with no added value for management of state programs. As designed, the requirement would result in perhaps 50,000 lines of site info, each one with names, addresses, PSE change descriptions. It would be an even more overwhelming amount of manual data entry if there is no capacity to upload information from existing systems.
- For Direct Education (DE), information about the reach by demographics, mode of delivery, and time participants are involved is excessive; uses by the federal government are not apparent.
- Partner contributions with each organization's name, geographic scale, and contribution type for 30,000 partners is excessive, and would require a high workload to maintain accurately. Why is this needed nationally, and how will it be used?
- Entering the names of, and citations for, all evaluation tools is a high workload with no information about why it's necessary or how it would be used.
- For annual expenditure data, it is unclear if some would be reported publicly, and – if so – whether and how states would be consulted before posting or how these figures would affect future grant allocations. It is unclear if carry-forward is known or accurate when the AR is completed each January 31. Preliminary or inaccurate expenditure information risks incurring avoidable misunderstandings and politicization, possibly affecting future grant levels to a state.

Question 2. How accurate is USDA's estimate of the burden of proposed data collection, including the validity of the methodology and assumptions that were used?

(Note: The information about estimating workload came from only 2 states, the methodology was not well described, and some projections are based on federal data that are not comparable to actual state/local experience. The ASNNA comments below identify new activities that are added to those currently required or for which there does not seem to be added value for states.)

- Overall, the workload for the new reporting burden is much higher than at present and without apparent added value to states; many examples are provided elsewhere in this summary.
- Unknown if SP and AR will integrate/auto-populate; there would be a huge burden of new data entry/clean-up if they do not.
- SIAs are barred from needs assessment and Action Plan sections until after completion by SA; there's a new workload for SAs and SIAs afterwards.
- SAs are to provide 'outreach' for SNAP-Ed, a new workload requirement.

- The workload burden of implementing AR for 2023, starting on October 1, 2022, without having first done a SP, is unknowable. This would include back-estimating ‘baseline’ values.
- If ‘baseline’ estimates are used and every SIA must figure out how to make the estimate, then the numbers showing change may be inaccurate, making national year-end numbers unusable.
- Implementing the AR without first having data from a SP would not test whether the auto-populated data integrate between the SP and AR.
- The AR template in the June 10 *Federal Register* is likely to change again in response to comments and the field testing now in progress, making work on the 2023 AR starting in October 2022 irrelevant or wasteful.
- The proposed e-system does not appear to have capacity to upload spreadsheets and other data from states’ existing data collection systems; it appears to require manual entry.
- Cost allocation of staff and other expenses by ‘project’ is not practical and would be an extreme workload.
- Costing of in-state travel by each staff/trip is unnecessary and excessive.
- For PSE interventions, entering names, addresses, and PSE change descriptions for an estimated 50,000 sites annually would be a substantial new burden; states do not track PSE changes annually in each site because changes do not occur that fast and it’s an expensive, impractical burden for staff and partners.
- Partner names with the scale and contributions for an estimated 30,000 partners is excessive – why is this needed, how will USDA use it, and for privacy purposes, would states need to obtain permissions from partners to enter their information?
- 2 Success stories/ SA and SIA are a new requirement/workload; if ES and Success Stories are not also usable for public purposes (like SNAP-Ed Connection and in-state purposes) as they are now, this doubles the work.

Question 3. What are ways to enhance quality, utility, and clarity of the information to be collected?

(Note: For this complex, novel system, ASNNA maintains that it’s critical to work with states in an inclusive, transparent and iterative process to develop, test, roll-out, and maintain practical components of the new e-system that will be usable in-state, at SA, SIA, and LIA levels.)

- Eliminate any sections of the SP that are not subsequently reported as part of the AR.
- Provide simultaneous access to the Needs Assessment and Action Plan by SAs and SIAs; eliminate the requirement for SA alone to complete it.
- Work with states to develop a needs assessment template with information customized to SNAP-Ed purposes.
- Combine Sections 2 and 3 of the SP; assure that they flow within SP and to the AR.

- Change the definition of 'project' to include work done together by SA and SIAs. Something like 'Projects are clusters of interventions with common themes that reflect the integration of complementary, multi-level approaches and partnerships, and that are designed to achieve results in the *SNAP-Ed Framework* indicators' would provide both flexibility and accountability for results and priority outcomes.
- Eliminate the SMART objective requirement; it no longer appears useful.
- Evaluations should be reported by all programs, not only when they are done by dedicated evaluation staff or a consultant; evaluation is essential for running any program.
- Add multi-level, multi-method, qualitative, large-scale, and other evaluation methods that are appropriate for both large and small programs.
- Drop the excessive reporting of evaluation details such as start and end dates, names of, and citations for all tools.
- Eliminate separate costing for: 'projects', in-state travel/trips, all SNAP-Ed personnel in US with salary, time charged to SNAP-Ed, % time for administration, and delivery as it is excessive and unnecessary.
- Drop requirement to list all PSE sites (in past, estimated that program delivered services in ~50,000 locations/year) and the annual results in each.
- Design forms and e-system to easily accommodate technical changes in *Framework* indicators/measures without new OMB reviews.
- Remove the definition that coalitions must include more than 5 members; do not require entry of organization and contribution types for each member.

Question 4. What are ways to minimize the burden of information collection on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology?

(Note: This section identifies ways that USDA and states could work together to identify technological needs and specifications for the new e-system that also will allow much more efficient and flexible use of information and data, including in-state with SNAP-Ed partners for planning and tracking progress)

- USDA should work with states to develop a customized needs assessment template that auto-populates data from a variety of national public/private sources to generate state estimates that are auto-populated for SNAP-Ed criteria and provided by lowest available geographic level: census tract, county, congressional district. The e-system should also allow states to enter information from other reputable organizations, including in-state surveys, reports, and monitoring systems.
- Similarly, USDA should work with states to develop a customized profile that shows participation in other federal nutrition assistance programs (SNAP, schools, WIC, EFNEP, CACFP) by census tract, county, or district.
- Design the e-system so it can upload data from in-state sources and provide information back to states for their in-state use.

- Conduct inclusive, transparent demonstration projects to develop and test outputs (tables, graphics, updated *SNAP-Ed Framework* indicators/metrics, infographics, 508 compliance, other analyses, and depictions) that states can customize for their in-state use. Make results publicly available promptly and be clear about decision processes.
- Work with states so benchmarks in SP can be tracked during the year.

ASNNA Consolidated e-System Review Tool

Preliminary Questions, Comments, Concerns, and Recommendations Identified by Review Team Members during the 60-day Review Period

Federal Register, Summer 2022

3 Documents Reviewed: PDF Forms for Annual Plan (42 pages) and Annual Report (43 pages); Wire Frame/Screen Shots of Data Entry Cells (260 pages).

Color codes align the wire frame/screen shots and titles of the PDF forms; the two are not perfectly matched. **Needs Assessment and Executive Summary:** purple; **Coordination and Collaboration:** pink; **SNAP Ed- Financial Reporting:** red; **Project and Activity Results:** orange; **Evaluation Reports:** blue; **Major Challenges and Modifications:** green; **Success Stories:** maroon. Limitations: Why some wire frames do not fit into the PDF templates needs to be checked, and the content of the PDF templates and data from the screen shots were not compared.

Form Page # (Wire Frame)	Section Title	Comments
	Overall Comments	<ul style="list-style-type: none">• Timeline feels rushed, not adequate time to review, comment, and synthesize what the changes will mean for the program overall.• Would like a chance to review and reconsider AFTER using the new forms.• Members feeling overwhelmed with comments.• Many states do not have capacity to submit their own comments and this version includes input from a large number of organizations.• Preparing the FY23 annual report before we've submitted a Plan in the new system doesn't make sense, better to wait to enter the annual report until FY24 after all have submitted a Plan using the new system.• Current Plan may require too much manual entry which could be very time consuming for very large programs and/or programs with low admin capacity.• Mismatch between what is captured in the plan and then having to report against specific indicators. If

		<p>FNS wants to report against indicators, then unclear why states are defining their own priority goals, etc.</p> <ul style="list-style-type: none"> • The system needs to allow for importing tables of data. • Word counts are limiting, and completing text boxes introduces a lot of inconsistency in what is captured and can be aggregated for national use. • Estimated time burdens are unreasonable. • In many sections (plan and report), the State Agency (SA) needs to complete first before the State Implementing Agency (SIA) can enter in data. This will slow down timelines. • Unclear what is required vs. what is optional or might-be-skipped logic based on what is being proposed. • For specific questions - maybe capture as part of 'what are you looking for' and here are our recommendations. • "This is the antithesis of equity". • SNAP-Ed is a living, dynamic program; its e-reporting system must have the same characteristics. There is concern that, if not well designed, the new e-system will be static, expensive and complex to modify, and unresponsive to change over time. • Recommendations for state and federal Annual Reports, for technical assistance on the development of state plans, and for electronic reporting systems of program and fiscal expenses that were mandated by statute are found in ASNNA's 2020 Position Paper, <i>Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions in the 2018 Farm Bill</i> (2018) https://asnna.us.org/evaluation-committee/ • It does not appear that these recommendations from SNAP-Ed practitioners were considered in this Federal Register package.
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STATE PLAN

(1)	Authorized Agency Characteristics	No comments received.
(6-10)	Welcome to the SNAP-Ed Plan and Report	Should briefly describe the purposes, uses, and users of the system, as well as how it's supposed to work for the different stakeholders. Describe how the system will support missions of funder, states, communities, and also policy objectives it is intended to fulfill. Talk about output tables or other reports that will be generated,

	System- Plan	what info will be posted, and what the frequency of such reports would be. Describe how the system can be used by SAs or SIAs for their own purposes and what data/reports they will receive back. Make e-reporting exciting and important!
(11-15)	Welcome to the SNAP-Ed Plan and Report System- Report	<p>In plain language, describe for people who are going to use it, how it works, roles of SNAP SAs, SIAs, Local Implementing Agency (LIAs) in terms of its use, and how the system integrates entries and changes from year 1 plan → year 1 report → year 2 plan → year 2 report.</p> <p>For the budget section, describe how that info will be used in setting future grant levels or re-allocation since statute does specify that unspent funds may be reallocated and also reduce a state's future funding base.</p>
(16-23)	Starting the Plan	This section does not describe what assistance would be provided to SAs and SIAs in preparing for, testing, and standing up the new planning system. Recommendations for ways that USDA can work with states to address challenges, work with grantees and subgrantees, and help states set up and maintain systems to compile state data are found in ASNNA's 2020 Position Paper, <i>Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions in the 2018 Farm Bill</i> (2018) https://asnna.us.org/evaluation-committee/
1-1 □ 1-8 (24-35)	Section 1. Target Audience & Their Needs (SA only)	<ul style="list-style-type: none"> ▪ Health, food security (P1.1), demographics (P1.2), SNAP participation, appropriateness, access, geography. <p>The needs assessment is too global; it should focus on modifiable factors relevant to SNAP-Ed outcomes, especially food security, diet quality and physical activity, among people segments and communities. Should include PSE changes and focus on SNAP-Ed eligible cohorts and communities, with comparison data to people and geographic areas with higher incomes. Preventing distal health outcomes like cancer and diabetes is known to require modification of community risks.</p> <p>Recommendation: Data should auto-populate from authoritative national sources available at the smallest geographic level, e.g., census tract, city/county, reservation, Metropolitan Service Area/Media Market, Congressional district. Ideally, use a custom data set that integrates many sources, e.g., Community Commons. Ideally, data sources would show trends over time. Provide space for states to supplement with state/metro info whenever available.</p>

Page 24

How are SAs and IAs meant to collaborate? Can they collaborate on this section within N-PEARS or is the collaboration external and then put into N-PEARS by the SA?

Likewise, will there be some way for SAs and SIAs to see what information is required to complete the Needs Assessment without going screen by screen through N-PEARS?

Page 25

Our SA has a separate contract with a team that evaluates SNAP-Ed and now conducts the needs assessment. According to the PEARS team, we can add additional SA users, but they would have complete SA access (meaning they could review/approve plans). Realistically, I expect that SIAs will still submit this outside the system for the SA to input. I asked FNS on the PEARS Advisory group call if their expectation is that SAs do the needs assessment, and it sounded like the answer was yes. I imagine most SAs don't have the capacity to do this, but it does seem important if they are selecting and managing contracts with IAs.

500 words to include all stakeholders and a description of their involvement? Should it be a drop down menu instead to add stakeholders, so that they can be auto filled from previous years? Or, is this a redundancy that can be removed? Can this not be determined by coordination and collaboration tables?

This should be in table form instead of an open text box. I think it would make more sense when completing.

SAs should be able to give SIAs access to these sections if they have the responsibility of conducting the needs assessment.

I wonder if there could be a previous screen that asks if the needs assessment was done solely by the SA or in collaboration with SIAs? If the second option is selected then the SIAs can have access to contribute to the needs assessment portions.

Wondering if it is possible to move between screens in this section or if each part has to be completed in order? Likewise, will there be some way for SAs and SIAs to see what information is required to complete the Needs Assessment without going screen by screen through N-PEARS?

According to FNS-2022-0017-0003 (the SNAP-Ed Plan Form) the states are encouraged to collaborate with SA and SIAs to complete the needs assessment. How are SAs and SIAs meant to collaborate? Can they collaborate on this section within N-PEARS or is the collaboration external and then put into N-PEARS by the SA?

Page 26

In future years it would be great for this to auto-pull data from common datasets or sites like the *SNAP-Ed Engagement Network*. Then, users would simply click through and select which data points they would like to include in their needs assessment. There should also be space where local data can be included.

Note: Recommend these sections be auto-filled from most current US Census and other databases, e.g., Community Commons-SNAP-Ed, etc. Show state averages compared to SNAP-Ed audiences <185% FPL), both in numbers and %. Include conditions that can be modified through SNAP-Ed interventions; drop those that cannot Align age ranges consistently throughout the system, e.g., <5 years, 5-7, 8-10, 11-13, 14-17. Use metrics from secondary data bases that align with those in the *SNAP-Ed Framework*.

Agree with note, above, but some states can go up to 200% FPL, so would need to be adjustable for states with different income limits. Otherwise, it's not a practical needs assessment.

It says above that the goals and objectives should be based on the needs assessment, so what specific information is being asked for here?

Page 27

Why are we expected to download a USDA map in order to resubmit the same map back to the USDA? If the goal is to be sure that SAs have viewed the map, then include a checkbox that the USDA Atlases have been checked. (3 commenters agree)

Agree. Another option would be to have the system auto-populate the map/table by state and the user "accepts" the map. I can see the benefit in having all of the pieces together in one place but agree that it doesn't make sense for us to resubmit the map back to them.

Note: This should be auto-populated from a USDA database.

Page 28

Example of why we would still need a template, to know what data is required for input.

Do we have access to this information from the US Census? We have access to state level data, but not necessarily demographic data for those living below 185% of the federal poverty line.

On SNAP-Ed FY23 *Guidance* pg 52, it said "Note that 185 percent of FPL may be used as a proxy for the SNAP-Ed eligible population." I think it meant FNS knew we don't have data for 185 FPL but we can use whatever existing poverty data that is provided?

I have the same question.

Would be great to have the US Census American Community Survey (ACS) report this information at 185% FPL.

Very focused on quantitative information, and this might lose community knowledge or qualitative data. I know we can upload more reports, but it isn't prioritized.

Too bad there isn't an import function so someone doesn't have to sit there and manually enter information that already exists in a .xls or .csv. Again, if much of this is ACS data it would be great for the system to auto-populate.

Page 29

Is there a way to auto-populate this from state agency/dfs datasets? (Two others agreed.) Or provide an option for importing the values.

This is a significant data entry burden. Right now, we can upload a table from our SA. With this system, we will have to manually enter the information.

Based on the new system, SAs would be manually entering this information (not SIAs, so you'd theoretically still submit it to the SA). These data likely come from the SA, so it would be nice if a correctly formatted

excel could be uploaded. Any manual data entry increases the likelihood of user error and adds time burden.

Page 30

In our state, we overlay SNAP participation and free and reduced lunch rates with our infrastructure to place staff members to determine areas for program coverage. Can this approach be reflected with this current set up?

Similarly, in my state we map income by census tract to ID locations for staff placement. I would like more clarity on what is considered "significant". Is this a subjective assessment of significant numbers? Perhaps it was intentionally left to be a subjective interpretation of significance? I just wonder if without any guidance some might determine there are no gaps.

Suggest small wording change for the first question in the second section: "Describe how SNAP-Ed programming is working to reach all groups...." might be that they aren't already reaching ALL groups but they are working towards it. Also, the final question in these sections - won't/shouldn't these be addressed in the Plans? Is it necessary to also have in the needs assessment - seems duplicative? I wonder if the SA puts this in the needs assessment whether it will limit SIAs creativity in their submissions and reduce the importance of incorporating community-voice in proposals.

Note: Geographic access to SNAP-Ed is limited by the size of a state's grant, while 'related' USDA entitlement programs (SNAP, school meals, WIC) are limited by other factors such as the degree to which administrative agencies encourage participation by taking advantage of waivers or other options, whether school districts promote the Community Eligibility Provision (CEP), or whether SAs have a priority on promoting SNAP. Be clear what info is wanted.

Page 31

Again, could some of this be pulled from the Collaboration and Cooperation section?

Response: I think the Collaboration and Cooperation section is part of the Plan screens which can't be completed until after the Needs Assessment is done. If that's true, then there might not be anything to pull from (but I could be wrong!)

Page 32

Our SA trusts us to determine this information. SIAs should be able to enter this information as they are the ones contracted to do so.

Maybe this is different for states with multiple SIA; there may be a bigger picture that the SA sees. The question also asks about SA capacity, so maybe a version of this question should be asked to SAs and a version asked to each SIA?

Response: That's a good thought, get perspective from both.

Page 33

5-7 Priority goals/state, coordination, workforce.

Priority Goals may change as a result of reporting guidance and feasibility. Priority Goals should be specified as topics or ideas based around spheres of influence/*Framework* guides with final goals and measures included in an overall plan in subsequent sections, after indicators and reporting metrics have been identified.

We would not prefer requiring/pushing states to have a goal for each sphere of influence (individual, environmental, multiple sectors, population). Our goals are usually more broad/aspirational, then we create objectives that address the spheres. We do this on purpose to show that layered approaches help to achieve goals. I like that the "goal type(s)" field is "select all".

Note: This is to be completed jointly w/ SA and SIAs.

Importance: There are 10 choices for Priority Goals, of which states are to pick 5-7. Recommend more than 1 Goal be in each of 4 levels/'spheres of influence' in *Framework*, e.g., Individual behavior change, PSEs of organizations/environments, Multiple sectors, population-wide change (P-indicators)? (Consider those with practical metrics/measures that can change over a 1-year period: R1, R2, R5, R6, R7)

Provide instructions to encourage use of LT indicators. Also include other choices for 1-6 for Priority Goals in 'process' topics, e.g., DEI, state priorities, etc..

		<p>Question: Clarify that 'goals' are aspirational, not meant to be measured, but that each has more than 1 SMART objective that is measurable.</p> <p>Question: What is the expectation of FNS of what <u>must</u> be included vs. what else would be <u>nice to</u> include?</p>
2-1 2-3 (36-41)	Section 2. SNAP-Ed Action Plan (SA only)	<ul style="list-style-type: none"> ▪ SMART Objectives w/ Framework and other Performance Indicators for State Priority Goals (P2.1) Auto-populates from P1.4 w/ 1 row/goal; SMART objectives; Framework indicators; Other performance measures. <p>A way to auto-populate the agency conducting a 'project' if there is only 1 SIA? And (newbie question), are there SAs that implement 'projects'?</p> <p>Response: Not in my state. We used Intervention as the terminology instead of 'project' and even then we are not using interventions in our day to day programming practices.</p> <p>Make sure the <i>SNAP-Ed Eval Framework</i> Indicator list has a n/a option if the field is required.</p> <ul style="list-style-type: none"> ▪ Projects and non-projects linked to SMART objectives (P2.2a) <p>The definition of 'project' seems open for interpretation.</p> <p>For some states, objectives are achieved across multiple planned 'projects' - this would result in repetition in this section.</p> <p>This is confusing. Here, SMART objectives are aligned w/ 'projects', not Priority Goals as in earlier form.</p> <p>This is the first time the term 'project' is introduced, and it's newly defined. Definition needs clarity, e.g., can be undertaken by a SA, SIA, or any combination of SA and SIAs. The term 'project' is used in statute, and 'results'/outcomes are to be reported. Therefore, they should align with Priority Goals, and SMART objectives are what's to be reported. A synonym to 'project' could be 'initiative' which connotes multiple different, complementary interventions.</p> <p>Agree with the comment below about the introduction of 'project' name. I think the change in definition of 'project' is more significant than FNS is acknowledging.</p>

FFY22 definition in *SNAP-Ed Guidance*: “‘Project’ means a discrete unit of nutrition education or obesity prevention intervention at the local level, which is distinguished by a specifically identified low-income target population.”

FFY23 definition: “‘Project’ is defined as an intervention or a cluster of interventions or activities executed by a single agency (SA, SIA, LIA or other subcontractor) with common goals, intended outcomes, target audiences (e.g., youth), and implementation setting types (e.g., school). Project activities include planning and reporting.” Going from a discrete unit to a cluster is a big shift, I think.

The ‘single agency’ call-out is sticky. For states who have grantees, does that mean each grantee is a separate project because a ‘single agency’ is delivering the work? Many grantees are using similar curricula, etc. and currently we are able to talk about the grantees as a whole in the plan of work and aggregate up eval findings for reporting. The burden of completing the forms will be exponential if each grantee has to be counted as a project. For those SIAs that don’t have grantees, they will be able to have ‘project’ categories, e.g., schools or ECE, because they are a single agency? All this to say, to the above points, the definition of project is not clear and different SAs and SIAs will likely interpret differently.

[Planned Projects & Activities]

Who completes this? I don’t understand why there would be added ‘projects’ or ‘non-project’ activities in a new plan? If intended for subsequent years, should be labeled as such.

Response: ‘Non-project’ activities are all efforts funded by SNAP-Ed other than projects that are designed to accomplish State priority goals and objectives. Examples include comprehensive needs assessments, general staff training (e.g., civil rights training), technical assistance, and peer-to-peer learning that benefit staff across multiple projects. (*FY23 Guidance* pg 170)

Other Response: They need to clarify “technical assistance to whom” in this definition. If it’s SNAP-Ed providing technical assistance externally, then that seems it should be part of a project.

Question: Do ‘projects’ get pulled into the future? For states with more than 1 SIA, does the SA choose what is included?

Question: Why is it important to know about ‘non-projects’? Aren’t the examples administrative or

bureaucratic activities? How/why would such info be analyzed and reported out, and for what purposes? If there are concerns about ‘other’ activities taking SNAP-Ed resources, couldn’t those be addressed during the required Management Evaluations (ME)? Aren’t outcomes and results what matters to everyone?

- **Non-project activities linked to SMART objectives (P2.2b)**

‘Non-project’ activity is also confusing. Why not align it w/ Priority Goals in the ‘process’ area of work?

- **Outreach. ≤ 250 words.**

Is this to be completed by SA or SIA?

Responses: It’s the SA. The directions say, “Describe the methods the State agency will use to notify...” If SIAs can’t contribute here, they’ll need to submit what they’re doing to the SA to enter here. Might be more efficient to allow SIAs to contribute, then SAs can edit/modify before final submission

Right...and for those states who have grantees, they conduct the outreach (with support from SA/SIAs).

- **Action Plan overview. ≤ 500 words.**

We should be able to skip this if there is only 1 SIA.

Agreed, unless the response focuses on how they complement other programs, but even that is duplicative of Section 5.

Strongly advocate for 4 and 5 year plan options in Plan & Report mockup, not just 3.

Under State Priority Goals, love the use of the Goal followed by the Indicator. After that, it seems like the next item should be, "How is the indicator measured?" versus Other Performance Indicators.

- The Indicator is not the assessment tool and is broader than the tool. Ex., number of survey responses doesn't tell us anything about what is found for the actual *SNAP-Ed Framework* indicator. It's just a process indicator to ensure the agency measured the indicator.
- So, (1) what was the actual survey used that aligns with the indicator selected? (This info would also help the USDA better understand which assessment tools are being most broadly used, which could inform later calls for interstate evaluations using the data!) and (2) the other column would then be a catchall for things NOT already covered by national *Framework* indicators. Ex., Number of

		<p>Champions is not an "Other Performance Indicator" for ST6; it is the way ST6 was measured.</p> <ul style="list-style-type: none"> ○ So, "# champions" should be in a column that asks "How did you measure this indicator?" Then, if the agency measures something like, say, socioemotional outcomes from gardening and finds no national indicator for that, this would be what is under Other Indicators. Folks who study the national <i>Framework</i> could then use this column to explore the need to add new indicators.
3-1 3-13 (42-45)	Section 3. Planned Projects	<ul style="list-style-type: none"> ▪ Project name, approaches, priority populations, languages, outreach (optional) The amount of information asked for/'project' could be a tremendous amount of work if a state has many projects. ▪ Direct Education (DE) and Policy, Systems, and Environmental Change (PSE) Settings/'Project' (P3.1): # sites/43 setting types (tribal, rural), approaches. There are 43 setting types, each with potentially hundreds of sites! The locations of sites often are not known at the beginning of the year because partners will join efforts over the course of the year, and some may drop out. ▪ Social Marketing Campaign Scale w/ geographic units. Most Social Marketing Campaigns (SMC) are statewide or regional/media market/multi-county. There are few (or no) known efforts at a sub-regional level that have all the formal SMC elements. SMC should be defined using the 8 P's of social marketing: Product (desired behavioral, institutional, or normative/social change), Place (locations where coordinated messaging/cues to action will be placed), Price (what a person/institution has to give up to adopt the change), Promotion (methods used to advance messaging and behavior change or to incentivize the change, including use of multiple types of paid and 'earned' mass media and social media), Publics (target populations, include intermediaries such as school administrators or retail food store personnel), Policy (PSE changes that also are sought by the campaign), Partnerships, and Purse Strings (how costs are shared). ▪ Evidence-based Interventions (Toolkit, previously developed, new). Name, approved by FNS, evidence base as per 3 levels (research, practice-tested, emerging). If research/practice, how adapted for 'project'?

		<p>If emerging, then the foundation evidence that will be developed over the year. If new, then was RO consulted, who will be involved, foundational evidence.</p> <p>Interventions section could be tricky - for example, in our state, the <i>SNAP-Ed Toolkit</i> is a resource for our LIAs but we don't have state-wide interventions from the toolkit.</p>
(46-70)	Info about Project	<p>46: It was stated in the 7/5 PEARS Advisory Committee (PAC) meeting that this definition of 'project' would help SIAs to compare apples to apples, unlike when we tried to define and compare interventions. How is this the case?</p> <p>Response: I think it just forces more consistency in 'project' naming because you can't be flexible with templates, but FNS needs to be more clear about what changes they expect in updated definitions of project and intervention. The forms alone won't accomplish it.</p> <p>This whole planned 'projects' section is the most confusing. If SIAs have to submit a budget for each project (per the budget section), then should all the efforts from an SIA be classified as a single project, even if they include DE, PSE, and SMC? If so, how does that work if the SIA teaches DE to adults and youth using multiple curricula, engages in multiple PSEs, and potentially runs 1+ SMC? If each DE, PSE, and SMC should be its own project for each SIA, then the 'project' budget section is not feasible (breaking a single staff member's salary + fringe across 5-6 potential projects is an impossible task for us, let alone doing it for things like office supplies, building space, etc.).</p> <p>Note: Change the definition so that a 'project' may be conducted by any combination of SA and SIAs, not solely a single SIA.</p> <p>Response: The first question here indicates whether it's a multi-agency project, so agree that updating the definition that a project can be done by multiple agencies.</p> <p>48: Note: If SMART objectives are tailored to each 'project' (<i>aka</i> initiative) or 'non-project', would the same SMART objectives pertain to multiple 'projects'/'non-projects'? Need an example.</p> <p>Response: I think they could. In our current state plan, we have overarching goals and SMART objectives. Some of the same objectives are addressed by multiple projects. For example, if the SMART goal around F/V consumption might be addressed by reaching parents in one project and kids through another.</p> <p>49: Why is indirect education not included in Approaches?</p>

Stage of implementation should be consistent across approaches

Are these 3 'approaches' inclusive enough, or should 'multi-sector' be added?

For social marketing campaigns, would it make sense to ask if DE, PSE, and multi-sector components are included, or would that be included elsewhere?

Are 'stages' needed? How is the info used by FNS? Would the results be reported out by 'stage'? Or, would SIAs get their data back by 'stage' to use in their analysis of results?

Recommendation:

(1) If 4-5 stages are needed, then make the terms consistent.

(2) For direct ed, there should be a category of 'maintenance' that aligns w/ LT, as there is for PSE. (Note that in PSE, there's 'adoption' followed by 'f-up assessments').

50: Why are **languages** not included for PSE? Also, I am wondering how the list of languages included was determined? Are these the most common in SNAP-Ed programming?

In a search in the *Toolkit*, most DE is in English and Spanish. Are 25 language choices needed? If there are few chosen, does it look like a program is deficient? Is the intent to get more focus in the program on foreign languages? Is this the right focus? Is the purpose here of comparing whether languages in the State Plan end up happening in the Annual Report? Why not just report at the end of the year?

Response: I think the point is for the languages to align with the languages indicated in the needs assessment. It wouldn't just be in the annual report as it should be considered for program planning (do the languages offered by SNAP-Ed programs match the languages spoken by the target audience?)

Programming would be deficient if it doesn't match the needs of the target audience.

Sites: In the past years, PSE sites have totalled around 50,000/year. Is it feasible to enter every single address where PSE services are delivered? If yes, what reports would be generated, e.g., by site type, county, congressional district, urban/suburban/rural/frontier? Would there be Reach/site type?

Social Marketing Campaigns: Definition should be expanded to include PSE and multi-sector behavior

changes. And demarcated by using commercial mass communications, not solely social media. Is it the intent to encourage in-language 'campaigns' in small geographic areas, possibly w/ immigrant groups? If yes, is this (a) needed (b) feasible w/ current resources and/or (c) politically savvy? (This may be one rationale for increasing SNAP-Ed grants.)

51: Do these **priority populations match those in the report section** where age groups were broken down further?

Questions:

- (a) By whom is this completed? The SA for the state as a whole, or each SIA?
- (b) After the huge section on needs assessment, is there 'guidance' on how to sort through all the info to focus on 'priority' populations? What is the rationale for the choices?
- (c) Is this out of sequence? Should it precede 'approaches' or follow the 'needs assessment' directly?
- (d) Age cohorts should be consistent throughout the Plan and Report.

53: Question: **Is it clear that 'outreach' is to be completed for each 'project'/'initiative' or other 'priority goal'?**

I think it's clear that it's by 'project', especially those that include DE. This is consistent with Civil Rights requirements.

Response: this whole section is about Reinventing Home Cooking: Farm to Fork Access, which is a 'project'. I think there is a section of Project Outreach in each of the 'projects'.

54: This is part of the 2018 statute. How will these 'methods' be summarized/aggregated for the country? After the first few years, they might consider converting this field to a list of methods with "other" options.

55: Propose a language change to the first sentence to demonstrate FNS's recognition that these are plans, namely: "Complete one row below for each setting in which direct education and/or PSE is planned." Whether or not we're able to implement the plan heavily depends on the readiness of partners.

Will N-PEARS dictate the rural locations, or do we have to dictate that? That is a huge administrative burden. Also, there could be multiple intervention approaches for each setting, so do they want us to add different rows for the same setting if the intervention approach is different?

Unclear how community-wide PSE would be entered (would need to see dropdown list). Working within only a system at a site and not higher levels is not really systems work. Needs clarity.

I feel like this table is backwards. Rather than listing by setting then 'project'/intervention, why not list by intervention and then for each one indicate (through checkboxes) the settings where it takes place? This is more consistent with other 'project'-level information required earlier in this section and seems way less time intensive to me. I do not think about our work in terms of setting, but rather by 'project'/intervention.

57: SMC scale - I don't understand what useful data this question would provide.

This totally confused me in the latest *Guidance*. In a frontier state, this question is especially frustrating because when it comes to SMCs and paying for it from SNAP-Ed, just about all of these scales are inaccessible (due to ensuring income-qualification in large-scale areas) other than site-level scales, which are only represented here by schools. It is nonsensical to me that schools are specifically called out as a scale while other potential agency/partner level sites, like ECEs, food pantries, etc., are not. If schools are listed, then other agencies/partners should also be listed, or all of them grouped into a single agency/partner-level site.

Social Marketing efforts match/support Direct Ed and PSEs, so shouldn't settings/units match to a degree? SNAP Ed marketing campaign should meet where the population is at, not just in schools- rec centers, eces, grocery stores, gas stations? email and social media/Facebook, Instagram?..etc.

It seems the second field has display logic based on the first question. We use zip codes and census tracts to target our SMC across the state. If they want us to enter ALL zip codes/census tracts, that will be a big task. Additionally, this level of detail is sometimes not known at the time of plan submission

62: What do they mean by "is this approved for use by FNS"? So, it's possible that FNS hasn't approved it but SIAs are using them? I don't really understand how that could happen.

FNS has a SNAP-Ed Consultant in each of its 7 Regions who is supposed to review and approve State Plans, provide TA or training, and conduct MEs. SNAP-Ed is an innovative program, and it must be responsive to partner realities as conditions in communities change; it is not feasible or efficient for FNS to approve every

		change. That's why qualified SIAs are engaged and 'allowable activities' are part of the <i>Guidance</i> .
4-1 4-3 (71-75)	Section 4. Planned Evaluations (SA or IA, only if done by dedicated eval staff)	<ul style="list-style-type: none"> ▪ Formative and Process Evaluations (P4.1) Name of eval, type (4 choices), details -components, dates, data collection methods, use of results. <p>71: More clarifying language is needed for planned evaluations. Should monitoring and process evaluations be included? If a pre-post assessment is completed with all direct education programs, does that need to be listed in this section?</p> <ul style="list-style-type: none"> ▪ Outcome and Impact Evaluations (P4.2) One row/evaluation w/ 3 types, Performance indicators (51 <i>Framework</i> and any others), 7 data collection methods, 3 design types; 3 measurements (pretest/posttest/other), start and stop dates; link to citation/prior eval's; planned use of results (7 choices). <p>Impact evaluation does not equate to a randomized controlled trial. Text boxes may be preferable to check boxes.</p> <p>The requirement to use the Annual Report form for FFY23, before the Annual Plan form. There is very little time to update our processes before October when FFY23 begins, such as finding validated surveys that capture indicators in the way FNS requires, updating our demographic data collection sheets, completing translations, and training staff to collect and enter data through the new system. The additional manual entry required is very burdensome, particularly for reporting on every site (for example, in FFY21, we had 1,116 PSE sites with 3,563 PSE changes).</p> <p>No option to pre-populate from PEARS. This is essential to us because it allows local agencies to track their data as they go. Requiring state level staff to enter will be a large burden. Additionally, there are tables where pre-populating from the Annual Plan will not be accurate because work planned may not reflect work completed.</p> <p>Volume of information collected. It's unlikely thousands of rows of data will be useful for FNS, and it is very burdensome for states. We would have to add staff members to complete this work, and it would take substantial time away from our regular work. We recommend that FNS instead create tables for summary information: what is captured in the PEARS indicator metrics tables and impact dashboards are good</p>

		<p>examples of summary data. This would give a more clear picture to FNS of our overall accomplishments for the year.</p> <p>Under Planned Evaluations... this is a VERY limited list of eval types.</p> <p>The reason this short list is problematic is because it continues to emphasize a type of linear evaluation that only exists if you fund a program for 1-5 or so years, starting with a formative eval, build a classic logic model, expect that the program will be tracked by process indicators to be carried out as intended, and after that there are short term outcomes, and if we're lucky, longer-term impacts or impacts tied to the interventions themselves. And then the program is done. It worked or didn't work, and the next round of funding is allotted accordingly.</p> <p>(1) No SNAP-Ed program we have ever encountered operates that way in reality. They tend to be cyclical programs that evolve over time and use data in a continuous way to inform changes because this is the real world and SNAP-Ed is an ever-evolving and long-lasting program.</p> <p>(2) 'Outcomes' evaluations tend to be used broadly in SNAP-Ed and really make sense here, but 'Impact' evaluations are rarely done. An 'impact' evaluation has 2 definitions - as an evaluation of longest term impacts, and as an evaluation that ties the interventions actually carried out to the outcomes measured. We have seen the word 'impact' suggest that intervention data have been analyzed against outcomes so that SNAP-Ed caused an outcome, but I have rarely seen any evidence that these types of analyses are actually conducted.</p> <p>The portal here should specify which definition of 'impact' that SNAP-Ed is looking for, and if it is the latter, should collect how the agency analyzed their intervention data (support provided) as the independent variable and the outcome(s) as the dependent (this could also be qualitatively vs using stats). I think what most agencies would report is that they only look at pre-post change and that interventions happened because they have process indicators to prove it, but that says nothing about whether the support actually led to the "impact".</p> <p>Note: Some interpretations have been that 'outcome' and 'impact' evaluations are 'research' and therefore not an allowable SNAP-Ed expense.</p>
5-1 5-6	Section 5.	<ul style="list-style-type: none"> Planned Coordination w/ Other Federal programs (P5.1)– Y/N for 20 programs, 6 purposes.

<p>(76-86)</p>	<p>Coordination and Collaboration</p>	<p>6 purposes are mainly process; none include population or PSE change.</p> <p>76: The checkboxes seem like they overlap, and it's not clear if they provide meaningful information. For example, coordinating on plan development would also mean coordinating messaging/materials/approaches.</p> <p>State-specific programs are missing while coordination with different branches of the USDA are included.</p> <p>Guidance in header is contradictory with table. "To be considered significant, coordination and collaboration should include regular ongoing dialogue and information or resource sharing. Only providing space for SNAP-Ed programming or distributing SNAP-Ed materials would NOT be considered significant coordination or collaboration." However, the table includes an option to select for coordinating messaging/materials and also improvement of SNAP-Ed access for target audiences - both could be accomplished through agreements of shared space and material distribution and could require significant coordination.</p> <ul style="list-style-type: none"> ▪ Planned Engagement w/ Multi-sector Partnerships/Coalitions (P5.2) – partnership/coalition name, 12 sectors, 4 geographic levels, key activities. 1 row/coalition. <p>P 5.3 This section needs an import function and/or ability to pull data from the existing PEARS database. Some states have very long lists of multi-sector partnerships/coalitions and entering line by line will be very tedious.</p> <p>P 5.3 Reporting around coalitions and partnerships has been tedious. For example, it's a huge burden to report all members of potentially large coalitions. Do they really need the number of each organization represented? People often wear multiple hats. No specific category for community members, who may play very significant roles in coalitions. (Another agrees.)</p> <ul style="list-style-type: none"> ▪ Planned Consultation, etc. w/ ITOs (P5.3) – Y/N, name of ITO/rep, 5 types of collaboration, description of each (≤ 250 words). 1 row/ITO. <p>P 5-5 The question is confusing. There are very specific definitions for tribal consultations, which are distinct from coordination and collaboration and mentioned in statute (but not defined). FNS should clarify if</p>
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		<p>coordination and collaboration fulfill statutory requirements. This method of reporting really makes this process seem perfunctory and not very meaningful. Tribal input is really important, but I don't know if this is the best way for states to report on it.</p> <p>If ITO receives SNAP-Ed funding, why enter the amount here when it should be reflected in the budget? This seems like the same information is reported in multiple places.</p> <p>It's not clear to me what it means for a SNAP-Ed agency to provide dedicated staff.</p> <ul style="list-style-type: none"> ▪ Planned Coordination w/ Minority-serving organizations (P5.4) – Y/N, MSI name, 4 MSI types, 5 coordination types, description of each(≤250 words). 1 row/MSI. <p>P 5-6 If a MSI receives SNAP-Ed funding, why enter the amount here when it should be reflected in the budget? This seems like the same information is reported in multiple places.</p>
6-1 6-9 (87-100)	Section 6. Planned Staffing & Budget	<ul style="list-style-type: none"> ▪ Planned staffing (state total) (P6.1) – for each staff person, FTEs, Salary, % time mgmt and delivery, job descriptions (attach). <p>This table is unclear. Column header says Position Title, but there's a row for the name of each SA and SIA staff member with FTEs paid by SNAP-Ed, salary, % time on management and admin for person paid by SNAP-Ed. Name and salary info may be public info in some venues, but not all. Is this info a privacy risk? Alternatively, if it's by Position Title, unclear if it would be an organizational classification or a working job title.</p> <p>The names and/or job classifications and salaries of thousands of people are being requested. This is a huge amount of new detail w/o a specified purpose. Would this information be part of the publicly available state plan? Why is this amount of info necessary?</p> <p>Other Comments:</p> <p>Very time consuming having to list our 200+ SNAP-Ed employees by line. It would be more helpful to be able to upload an Excel spreadsheet with this information already listed.</p> <p>The budget templates are a drastic improvement to what we've used the past couple of years. Hopefully these</p>

are Excel-based spreadsheets that allow for tabulation of expenses. The spreadsheets are similar to what I currently use (internally) for our budget planning.

Budget narrative section looks more uniform than previous years. No specific format has been provided in the past so this will be helpful.

Travel section is cumbersome. It is impossible to break down in-state travel this far. It is possible to break down the out-of-state travel specifically by trip based on what conference staff will be attending. For in-state travel, maybe consider listing travel as xxx amount per FTE instead of cost per day/trip.

We have standard in-state travel formulas (light, moderate, heavy) that are assigned based on an employee's job. These standard formulas would be used, or the rates used by the SA could be chosen.

Page 87

If this doesn't include subcontractors, a significant amount of information would be missing.

Positions often are vacant some or part of the year or salaries change over the course of the year. How can budgets accurately reflect this?

I am wondering this as well. I am also confused if each and every staff position has to be listed, or if categories of staff positions can (so Educator 1 'A' County, Educator 1 'B' County, etc. vs Educator 1- all counties, Educator 2- all counties, etc.)

- **SIA Budget (P6.2a) - Budget/'project' (11 object codes) and 'Other' activities (11 object codes); Total planned budget w/ all SIAs combined, combined total of 'project' and 'non-project' (10 direct costs, Indirect, total federal, unobligated balance/carry over from prior FFY, Total SNAP-Ed budget for current FFY).**

This level of fiscal info is much more than is required in statute. Statute asks only for states to provide their budgets in only 8 categories, not this level of detail.

Apparently, this section is completed only by the SA. But SIAs develop their budgets to match the year's plan using their own accounting to build the budget (and later expend against it), so the SIA should complete this

section of the Plan with the SA checking that it's ok and compiling the summary when there are multiple SIAs. If the SA and SIAs aren't both able to access the forms and work together on any changes, it will be incredibly confusing and inefficient.

- **Planned Project Direct Cost Budgets (P6.2b)** – SIA names and budget; Budget/'project' (11 object codes) and 'Other' activities (11 object codes); Total planned budget w/ all SIAs combined, combined total of 'project' and 'non-project' (10 direct costs, Indirect, total federal, unobligated balance, from prior FFY, Total SNAP-Ed budget for current FFY). (Completed only by any SA or SIA that conducts 'projects'.)

Page 89

STRONGLY suggest that budgets be done by AGENCY and not by 'project' because agencies will do multiple 'projects' and some 'projects' may be done by multiple agencies.

Response: I cannot agree more. Doing budgets by projects is impossible if DE, PSEs, and SMCs are all their own projects. It is not feasible to split things like salaries, building space, and office supplies between 5 DE efforts, 5 PSE efforts, and 2 SMCs. If the budget really must be by project, then it seems all the work an SIA does should be listed as 1 project in Section 3: Planned Projects. So much detail would be lost by doing this, but having a budget for every intervention is ridiculous and illogical.

States have different ways of tracking carry-in funds, and this isn't distinguished in the project templates.

- **Planned Direct Cost Budgets for Other Activities (P6.2c) -- Budget categories that auto-populate:** salaries, contracts/subgrants, office supplies, nut ed materials, travel (in- and OST), space, maintenance, memberships/subscriptions, capital expenses. (Completed by SA and SIAs.)

Page 90

Do state agencies do their own 'projects'? On page 6-2 of the plan form it says state agencies should enter planned budgets for 'projects' implemented by the SA.

How does one distinguish what is the administrative time spent on a 'project' activity versus a 'non-project' activity? I imagine that these 'project' and 'non-project' budgets will be so estimated that they are not meaningful. Strongly suggest that budgets be done for each funded agency and not by 'project'.

- **Planned Total Budget (P6.2)** – Includes Direct Costs (10 categories), Indirect Costs, Total Anticipated Federal Cost, Estimated Unobligated Balance/carry-over from prior FFY, and total federal budget for FFY. (Completed by SA and SIAs.)

Page 91

Why is the USDA requiring reporting of Non-SNAP-Ed funding? How are they using this information?
 Responses: Strongly recommend eliminating this. So many programs have multiple funding sources and this collection request is excessive, changes, and doesn't seem relevant.

Agree 100%. Why does this need to be reported? Additionally, our program may end up with small pools of outside funding throughout the year that we do not anticipate during planning. I don't want to have to account for that here.

- **Budget Narrative (text boxes):** Salaries/Benefits, Contracts/Subgrants/Agreements, Non-Capital/Office Supplies, Nutrition Education Materials, Travel (In and OST) w/ locations and purposes for each trip; costs for airfare, mileage, lodging, per diem, purposes, locations, positions traveling for each in-state and OST trips; space; maintenance; memberships; equipment. (This appears to be where data is entered to auto-populate some of the tables above. Completed by SA and SIAs.)

Page 92

How do people capture local travel (e.g., to and from a school for direct ed in this)? Sometimes meetings are yet to be planned, how do we account for travel funds without knowing all the details of what will happen in a year?

Response: In our current plan, we have a table that is just for Daily Mileage that estimates how much we expect our educators to be driving in the field over the year with the current mileage reimbursement rate. It is categorized under In-State Travel in our current plan, but that won't work, based on the tables provided here.

Page 96

Flexibility is needed as some agencies have different methods of calculating indirects. For example, some calculate a percentage of certain direct costs, pass-through indirect on subcontractors, which sometimes is

		<p>capped. Our agency charges an indirect cost per FTE, not as a percentage of direct costs. That flexibility will be necessary for budgets. We currently have an excel template with a formula for indirects, but some agencies go in and manually enter it because it isn't always the same percent on all direct costs.</p> <p>Page 97 Some SAs, including mine, manage to underspend at the state level. How would FNS suggest we handle this section?</p> <p>Page 98 How is carry-in vs. allocated covered in these budget forms?</p> <p>For states with subcontracted LIAs, this is very limited information on a significant portion of our state's budget.</p>
(101-111)	Review IA Plans	No comments received.
(112-131)	Final Review	<p>Page 112 At this point, the plan would need to be exported from N-PEARS to be entered in our SA's task tracking system for leadership review.</p> <p>Response: Yes. This is a huge concern for our SA- how will SAs be able to review the plan without every member involved in the review process having to have an account with N-PEARS? There needs to be an export option that relays all the information in a usable format.</p>
(132-134)	Prepare for Plan Submission	No comments received.
A-1	Assurances, Signatures	No comments received.
ANNUAL REPORT		
(136)	State Report	ASNNA's 2020 Position Paper, <i>Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions in the 2018 Farm Bill</i> (2018), contains the template that ASNNA recommends for state Annual Reports. https://asnna.us.org/evaluation-committee/ The template was

		<p>designed based on the need to provide publicly-facing reports that could be posted online and contain concise information needed nationally and by state and local stakeholders.</p> <p>The proposed Report focuses on too many details so lacks any apparent focus. It is not clear why so much detail is asked for rather than focus on key outcomes and performance indicators that are of general interest. Site-based and community-based reporting would be much more meaningful than, for example, changes-adopted-based reporting for PSEs (as currently proposed). Furthermore, in PEARS itself, there are currently too many changes-adopted to be of value for the annual state report. I recommend the changes-adopted be grouped into broader, meaningful categories of changes-adopted for the Annual Report.</p> <p>To help unify the work in diverse communities and settings nationwide, the ASNNA Position Paper recommends reporting against state needs, assets, challenges, inequities, and key demographic and health indicators of relevance to the SNAP-Ed mission in the AR. It does not appear that these criteria would be called out in the AR.</p> <p>For clear communications, the ASNNA Position Paper recommends that the AR include the names, websites, and contact information for each SIA. Having this information in the final AR does not appear to be included in the proposed system.</p>
1-1 1-2 (137-142)	Section 1. Executive Summary	<ul style="list-style-type: none"> ▪ Key Successes on SMART Objectives (R1.1). ▪ Other Achievements. ▪ SA only -- Range of Projects and Activities <ul style="list-style-type: none"> ▪ Target audiences -- Map of DE and social marketing campaign sites. Demographic review w/ DE, SMC, and PSE. ▪ How gaps were addressed. <p>Page 138</p> <p>Make instructions for "this page is only for State Agencies" clearer.</p> <p>Page 139</p> <p>Is the map showing only social marketing campaign areas? How about sites for DE and/or PSE? I am confused...</p>

		<p>Agreed. I don't understand what this is providing?</p> <p>Boring—just activities; nor clear what each row is based on.</p> <p>Based on experience in the states, the ASNNA Position Paper calls for Annual Reports to have 8 different features: be available to the public promptly; ADA compliant; suitable for posting on a website, showcasing emblematic, large-scale collaborative efforts; in plain language with no jargon; have graphic displays of the reach, locations, and partnerships of local agencies; contain short, engaging, and timely state and federal reports; and summary at state level with specifics at the SIA level. Almost none of these features is described in the proposed Annual Report template. Therefore, it is difficult to assess the usefulness of the data without seeing how they plan to use it.</p> <p>Would be good to know how they plan to aggregate, synthesize, report, and disseminate the information. The Position Paper recommends the Report auto-generate graphical summaries at the state and even SIA level, in addition to the federal level. That would make the data much more useful. This information is provided, but it is not clear if it will be outputted in the useful ways that states would like to see.</p>
2-1 2.5 (143-151)	Section 2. Coordination and Collaboration (Update from Plan?)	<ul style="list-style-type: none"> ▪ 20 fed programs listed (R2.1) – Y/N, 6 purposes w/ other <p>Pg143 Why is this included in the Plan and Report? For this, it seems like it could be only requested annually.</p> <p>Under the purpose of coordination and collaboration, unsure what "Coordination of Messaging/Materials/Approaches" means; may be helpful to have examples in the report to assist in selection.</p> <p>Pg 144 Questions for others on the ASNNA <i>Federal Register</i> committee: we typically report coalitions even if they don't have at least 5 diverse sectors because we think they are important. Not all coalitions have such diverse sectors represented but they can be functioning and productive. Now they make it official to report only coalitions with at least 5 diverse sectors, do you think we should ask for definition revisions to make the definition more broad? What's your thoughts?</p> <p>Response: I struggle with the balance of FNS requiring more information versus us collecting information</p>

that's useful even if it's not required. I think it's worth broadening the definition if it's agreed that coalitions are important even without 5 diverse sectors (I personally find that category somewhat arbitrary and not reflective of the relevance of a coalition).

We would like the definition of coalition adjusted. Many of our most productive/effective coalitions do NOT have 5 different sectors represented but are doing incredible, community-level work. Limiting to coalitions only have 5 different sectors represented doesn't capture the variety and depth of SNAP-Ed collective impact work.

Pg 145

Is this getting imported from the Plan and then we describe the key activities?

Response: Hope this pulls from the Plan but also can auto-populate based on PEARS data and/or an imported file.

Pg 147

This comment applies to all these questions about key updates. Let's say an agency spends FFY23 consulting with tribes and includes that in the FFY24 plan describing the role of consultations done to develop that plan. It seems redundant to then re-report those activities in their FFY23 report.

Include an option to pull FY23 annual report or plan data into the following year's plan to reduce duplicative entry.

- **Multi-sector engagement (R2.2) – partnership/coalition name, 12 sectors, geographic level, key activities.**
- **ITOs (R2.3) – Y/N, name of ITO/rep, 5 types of collaboration, description of each.**
- **Minority-serving organizations (R2.4) – Y/N, name, 4 MSI types, 5 coordination types, description of each.**

It's not clear if the content of the Plan and the Report will integrate; how/whether the Report will highlight changes over the year, or if there were any results, except for ITOs and MSOs. Report does not ask for any explanation for changes.

		<p>In my state, we had lots of discussion around burden - for states that use PEARS it will be very helpful if data is imported. Otherwise there would be a tremendous workload. If information is imported from PEARS, there are gaps in what is collected in PEARS and what is required in N-PEARS.</p> <p>Not clear in the list of programs and multi-sector partnerships if collaboration with LIAs, SIAs, and SAs should be included or just state-level collaborations.</p> <p>Coordination with the programs and community impacts are there, but counting partnerships at the 'project' level is not particularly useful. Community level might make more sense for showing synergies.</p>
3-1 3.4 (152-161)	Section 3. SNAP-Ed Financial Reporting (Actual)	<ul style="list-style-type: none"> • Implementing Agency Expenditures (R3.1a): Total/SIA. SA completes. Confusing. Apparently auto-populates from somewhere—maybe Table R3.1d? • Project Expenditures (R3.1b): Auto-populates from P3.1c (not found). Would show Direct Costs for each 'project' by 10 cost categories + Total/project <u>and</u> totals/each of the 10 cost categories for all 'projects' combined. <p>Page 153 One of the stated objectives of this new reporting system was to decrease burden on SAs and IAs, but reporting expenditures by 'project' significantly increases the burden. This does not accurately reflect how budgeting is actually done. We will be going from one budget to at least 5 in my state. Agree with comments about 'projects'. While the templates in previous <i>Guidance</i> always referred to 'project' budgets, the administrative expenditure report has been required by SIA, not 'project'. It should stay that way. One change that is welcomed is that the expenditure report categories are now harmonized with budget categories. In FFY 2022 <i>Guidance</i>, categories were unclear (e.g. reporting costs).</p> <p>7 CFR272.2 (d)(2)(xi-iii) doesn't require expenditures by 'project'. "Fiscal recordkeeping and reporting requirements. Each participating State agency must meet FNS fiscal recordkeeping and reporting requirements. Total SNAP-Ed expenditures and State, private, and other contributions to SNAP-Ed activities are reported through the financial reporting means and in the timeframe designated by FNS"</p> <p>Budget categorized by projects add burdens to SIA on trying to tease out dollars used by different 'project'</p>

because many of the categories listed are used in multiple projects. Recommend to report expenditures by SIA or agency instead of by projects.

- **Other Expenditures (R3.1c):** Direct Costs for other (non-projects) activities by 10 cost categories + Total and totals/each of the 10 cost categories for all ‘non-projects’ combined.

Page 154

Recommend keeping administrative expenditure report by agency and not by project. That would eliminate this page.

- **Total SNAP-Ed Expenditures (R3.1d):** Cumulative ‘project’ and non-project totals for SA and each SIA. Includes Direct Costs (10 categories), Indirect (excluding space), total federal, unobligated balance/carry-over from prior FFY, Total federal expenditures from current FFY

Page 156

The carry-over balance from the previous year was reported in the next year's plan. (e.g., FFY 2024 plan includes carry in funds from FFY 2023). Why here, too? Does this eliminate the unobligated funds report that is currently due to FNS on December 31? If not, this should be eliminated from here.

Do SAs and SIAs know their unobligated balances by 1/30 due date? How do amounts in each AR reconcile with/carry forward into the next year's grant allocation for the SA and the SIA, and the next State Plan?

- **Program Income – Y/N, how/why generated, how was/will be used (≤ 250 words)**

No comments received.

- **Budget categories** that auto-populate: salaries, contracts/subgrants, office supplies, nut ed materials, travel (in- and OST), space, maintenance, memberships/subscriptions, capital expenses.

It's not clear how content of the Plan and Report integrate; how/whether the Report will highlight changes from the Plan; Report does not ask for any explanation for changes

Did not have time to double check this: The wire frames may ask about FTEs NOT paid by SNAP-Ed and

		entire budgets of SAs and/or SIAs, but I didn't see these entries in the PDFs.
4-1 4-21 (162-164)	Section 4. Project Results (auto-populated from Plan)	<ul style="list-style-type: none"> ▪ Project Approaches (R4-1): Update Section 3 of the Plan; presumably the extensive Table 3.1. For each Project, includes name, approaches, priority populations, languages, outreach (optional). Adds stage, e.g., implemented or not yet implemented. <p>How this works is unclear. Instructions say to update from Section 3 of the Plan but Table R4.1 shows only 3 approaches: DE, PSE, and SMC. Did not have time to look carefully to see how/if the Plan and Report forms align and what's added for the Report.</p> <p>Interventions are sometimes combinations of DE, PSE and indirect ed (IE) and may not correspond to a <i>SNAP-Ed Toolkit</i> intervention or other previously developed intervention.</p> <ul style="list-style-type: none"> ▪ Project Sites (R4-2) w/ # sites/43 setting types (tribal, rural), approaches. Excludes SMC if in broader areas rather than specific sites. Asks description of each site (setting?) w/ an intervention for both DE and PSE! <p>What is a SMC that is only in a site type? That's inconsistent with the definition of a SMC. This will be a very long table for some states. For example in FFY21 we worked in 2,302 sites.</p> <p>We do not track DE that is not yet implemented.</p> <ul style="list-style-type: none"> ▪ DE Reach (R4.3): Asks for Actual and Estimated Reach by 9 age, 4 gender, 2 ethnic, and 6 racial categories. <p>Age categories are more specific than currently collected.</p> <p>Concerns about gender categories.</p> <p>Unduplicated Reach may not be possible.</p> <ul style="list-style-type: none"> ▪ DE (R4.4a, R4.5a, R4.6a) -- MT1, Healthy Eating Outcomes; MT2, Food Resource Management Outcomes; MT3, PA and Sedentary Outcomes:

- o Reach: Asks unduplicated reach/DE ‘project’, 3 modes of delivery, 4 categories for series education, and minutes that ppts engaged in DE.
- o Individual behavior change (MT1 [7 options], MT2 [options], MT3 [1 option]) w/ multiple outcome options, pretest and posttest results and data collection instruments.
- o ‘For future reporting’, asks for all additional measures being tracked: MT1 [9 options], MT2 [9 options], MT3 [13 options].

Did not have time to check whether these measures are from the *Interpretive Guide*. If so, could be a drop-down. If so, for those that enter such data, also need to verify the potential of aggregating measures into a national summary report.

Some metrics are unclear, e.g., what is the guideline for sugar-sweetened beverage (SSB) consumption?

We try to avoid evaluating just DE but rather evaluate the complete combination of interventions in a given setting or community. Seems like so much focus on DE is inconsistent with the synergistic approach which is the core of SNAP-Ed.

- **PSE (MT5, MT6) changes maintained this year (R4.7):** Would auto-populate from PSE changes reported in the prior year’s Annual Report. Would show updates for: estimated reach/site; from menu, check type of PSE maintained/sites and update description.
- **New PSE (MT5, MT6) changes adopted this year (R4-8):** Make new entries for estimated reach/site; from menu of changes for each site/setting, enter and describe PSE changes/site w/ short description of each change.

Check wire frames: Does this really mean individual sites in each setting, potentially hundreds of thousands? Unclear where these data would come from. Language is very unclear; ‘site’ and ‘setting’ are different units but sometimes appear to be used interchangeably.

For the first test year, since there is no State Plan, the AR section would require reconstructing the activities/‘projects’ that, in future, would have been carried forward from the State Plan. The data will not be real, and it will not be possible to see how the auto-population feature carries forward information from the Plan to the Report or whether comparing Plan and Report entries actually enables SIAs to measure change over the year.

It also is unknown if, or how, the data in a first-year's plan or AR will auto-populate into the subsequent year (s). Many people will be entering data over time, so if instructions and definitions are not clear, and there are not training and quality checks, there are likely to be challenges with change in personnel from year to year that will make comparisons problematic. These features were not addressed.

The language, instructions, data entry, and operability are totally confusing! The design is a start but not ready for implementation until it's thoroughly tested. As it is, this giant field test would subject the entire nation to total dysfunction.

Yes, Table R4.8 seems to be asking for one row per site and within that one row for each PSE change adopted. Reach is not currently reported by PSE change.

This makes no sense to do so by 'change adopted'; should be done at the site level; current PEARS reporting is at the site level; this info is not available for each change adopted.

- **PSE Active Partner Details (ST7) (R4.9):** For 24 partner types, asks number of partners in each category, which of 4 geographic levels, and 10 types of contributions by each

This will give the number of partner organizations for each partner type at each geographic level and a list of contributions types for each partner type. Since this would include all sites where PSEs occur, there will be thousands.

Why are we reporting only PSE partners? We would like to include all SNAP-Ed partners (including those with DE only) for ST7. Reporting DE partners only when there is also PSE will be a drastic undercount of the program's reach in the state. Additionally, for many sites DE is the bridge to PSE and deepening relationships. SNAP-Ed is supposed to be responsive to partner needs and readiness so I think it's important to show the spectrum of partners the program reaches.

- **Social Marketing Campaigns (MT12a and 12b):** Asks for stage of each, languages if campaign has been implemented (24 choices), primary topics (6 choices), smallest geographic scale used to measure coverage (10 choices, from census tract to multi-state media market).,
- **Reach by Segment (R4.10):** For 12 possible market segments, asks number of SNAP-Ed and all/total individuals where SMC was conducted.

		<ul style="list-style-type: none"> ▪ Reach and Impressions by Channel (R4.11): Impressions by channel are required; reach and engagement/channel are encouraged. For 9 media channels, asks if channel directs people to program website, how many people/hits (?), which of 6 sources were used to obtain reach numbers, and which of 5 engagement types were measures. ▪ Indirect Education Channels (DE and PSE only, not SMC): Y/N, 24 languages. <p>This may be new; does not seem to be a comparable table in the State Plan.</p> <p>Is anyone curious about the elimination of IE channels for reporting reach? What is the role going to be for IE channels? I am not against removing it but it is a huge change.</p> <p>Not clear what an intervention is or even if this could be easily defined, especially in states where many LIAs do not use prescribed ‘interventions’; they use approved curricula but then consider DE, IE, and PSE in novel ways and combinations (in response to local opportunities and needs) that vary greatly from place to place.</p> <p>How interventions work together is not well addressed since DE, PSE, and IE are reported separately. Community-based reporting is much more meaningful to show synergy, i.e., combination, extent, and reach of interventions in a given community, at a given site or group of sites, and/or reaching a geographically-based population.</p>
(165-202)	Project Results	<p>Impact of ‘projects’ are included with too much other information; not clear how it will be displayed; currently too many tables with too much information. Recommend key information be pulled from this and graphically displayed in an infographic format. It would be useful to see how they plan to synthesize and present this information for dissemination. I did not see any info on how they plan to aggregate and present this data.</p> <p>In our state, having ‘project’ = SIA makes sense, since we do most of our evaluation at the SIA level; we don’t evaluate ‘projects’ at any other level; we do strategy-level evaluations, but this would probably best be addressed in the Evaluation Reports section. So if SIA = ‘project’, then the proposed report format would allow for reporting on reach, outcomes, and impacts. Unfortunately doesn’t allow for reporting on the evaluations of the combined approach (DE, IE + PSE); those would be reported on in the evaluation reports which really doesn’t make sense. The proposed report template doesn’t appear designed to look at synergies.</p>

As mentioned above, community-based, site- or population-reporting might be a better approach.

Not clear what the key behavioral or health outcomes are for the proposed report. The only place for behavioral and health outcomes (results) are in the DE section and the Evaluation Reports section. Also this assumes we evaluate DE as a separate component which is not necessarily the case and not consistent with the recommended DE + PSE approach to program design.

P 165: Under what circumstances would a project be added if it wasn't in the plan?

P 166: This should be automatically inputted from the Plan, maybe with a checkbox confirming that it was implemented as planned. Right now this seems very redundant.

Interventions Used, pg 168: I am having trouble trying to understand "foundational evidence base". Recommend change of wording for more clarity. Suggest "evidence for implementation and/or effectiveness"?

SNAP-Ed Evaluation Indicators Measured, pg 171: Shouldn't this be ST1-8, MT1-13, LT1-19, R-11? Recommend defining or linking to *SNAP-Ed Evaluation Framework*.

Project Sites, pg 172: Extremely concerned with reporting burden for SIAs that do not need to report sites and addresses. Also, question funders' intention in having this information. Why the need to collect sites and would the addresses be publicly available?

Response: I think this information is captured in PEARS. Are other states reporting this information? For states that use PEARS, how would data transfer from PEARS to this system?. For states that don't use PEARS, how are you collecting this?

Other response: I agree that is overly burdensome. Why are we having this level of oversight where we need to individually enter each and every site? How will this information be used by the USDA?

Project Sites, Edit Site Data, pg 173: We try to do multilevel, comprehensive interventions. It is not clear this is accounted for in the 'project' site entry.

Response: Agree that focusing on site is a very limited frame for SNAP-Ed approaches like PSE and social marketing. Unfortunately, that's a foundational issue in the program, in addition to being reflected here.

Reach, pg 176: Gender: adding transgender is great but not sufficient. Recommend adding non-binary and prefer to self identify.

Response: Agree. I have some concern about the transgender category. People have different preferences for how they self-identify, but concerned that transgender as a separate category from male, female others trans folks in their male or female identity. I don't feel comfortable making a recommendation without more understanding from trans folks about the best, most inclusive gender categories.

Also, just realized the age group 76 and above is singled out, why?

Mode of Delivery, pg 177: question on average amount of time participants engaged in DE: it can get so complicated to calculate because participants can attend multiple sessions, or only a couple, and I am interested in knowing how they plan to calculate them. Was it just the total number of participants divided by total amount of time (number sessions x series)? Do we need to calculate it ourselves?

I feel like this is an attempt to capture the information from EARS Item 4 Column B (Time Range). For us this is estimated from our PEARS EARS export. Users enter the length of each session and the number of users. How have other states captured this for EARS without PEARS?

Individual Behavior Change MT1, pg 179: Will this auto-populate info needed based on our *Framework* indicators in our priority goals set in projects?

This is pulling data from a specific project. In my state, multiple LIAs implement the same curriculum with the same age group, and the pre/post tests are aggregated to analyze as a whole. How will that work if the same curriculum is under different projects because it's done by a different agency? And Are there tests for statistical significance?

Current fruit/vegetable (FV) questions include responses for participants consuming FV less than one time per day, do we then exclude data with participants who ate less than once per day? Is this a good measure?

Individual Behavior Change MT2, pg 180: Why do these age ranges not match the priority population age ranges in the plan section?

Just realized all behavior indicators have the age for 76 and above being singled out, why? What is the

reason?

PSE Change Initiatives, pg 183: What is the purpose of separating maintained and adopted? If there is a site with maintained and newly adopted change then how do you report? Report same sites at both sections?

PSE Change Maintained, pg 184: Such a narrow interpretation of PSE only at a specific site! Really wish we could get out of this approach to our plans/implementation/reporting.

PSE Change Maintained, Add PSE Site, pg 185: Instead of Estimated Site, it is Estimated Reach.

Social Marketing, pg 190: Is the planning and development question related to the boxes checked above or is it more general? And these stages are different from the stages from page 49 - should be consistent.

Social Marketing Campaign Details, pg 191: Still not sure what the point of campaign scale is...

Market Segments MT12b, pg 194: Is this optional? This seems like intense reporting for some states who might just be in the planning or development phase...

Reach and Engagement by Channel, pg 195: How do we aggregate reach and engagement if each agency uses slightly different metrics? And how can this data be used to know if SMC is successful? Do we report qualitative campaign data in success stories?

Separate wording issue: Should it not say "Other social media platforms"? Facebook, Instagram, Twitter and Youtube are social media....

Response: Agreed, why separate out paid social media from the other listed channels?

I am also curious about how SMC campaigns fall under "projects". I'd kind of expect a social marketing campaign to be a project. Yes, it seems that the only way to report SMC activities is as part of a larger "project".

Indirect Education Channels, pg 197: We often use IE to support our DE efforts. It does not seem that this reporting system will allow us to include that information.

Response: This aligns with how IE activity information is collected in PEARS, and then it's tied to an

		<p>intervention. This might be a bigger departure for non-PEARS states.</p> <p>Other Results, Optional, pg 198: Does FNS really want information here? It feels like these other options are such a wild card of which states submit more and what (for both plan and report).</p> <p>What if something different, or not exactly the same, is an evaluation indicator? Need to be able to list other indicators, not just those in the <i>Framework</i>.</p> <p>Findings are more logically organized by evaluation study, not by <i>Framework</i> indicator. What about important findings that are not indicators or combinations of indicators?</p> <p>If a ‘project’ is defined as an SIA, then yes, it would accommodate multiple SIAs. Or if ‘projects’ are SIA-specific. The evaluate report section could also accommodate reports from multiple SIAs.</p>
5-1 5-4 203-208	<p>Section 5. Evaluation Reports (Updates Plan)</p>	<ul style="list-style-type: none"> ▪ Overview: Single ‘project’ or >1? <p>The FY 2023 <i>Guidance</i> notes that an evaluation plan is not required for project monitoring, which includes collection of MT1-MT3 because it is included in plan section 4. This instruction is not included in the Evaluation Reports section and will lead to confusion.</p> <p>Need to clarify if just state level or local level too.</p> <p>Clarify if this is only to be filled out after all dissemination is finished. Otherwise, can’t complete the table; or do we just fill in whatever has been completed each year? How would this work?</p> <ul style="list-style-type: none"> ▪ Projects Evaluated and Evaluation Type: Appears to display ‘project’ evaluation Tables P4.1 (each formative/process eval) and P4.2 (each outcome/impact eval) in Plan which display: 4 types (formative impact), 3 components (DE, PSE, SMC), 3 types of performance indicators (SMART objectives, <i>Framework</i>, other). <p>The definitions of outcome and impact evaluation are narrow, especially of impact evaluation. This evaluation reports section further limits equity works by emphasizing “categories” that people can check when doing evaluation. There are many different methods including qualitative methods in evaluating formative, process,</p>

	<p>outcome or impact evaluation. There is by no way RCT is the only or gold standard for doing impact evaluation. I would recommend scrap this section or make it into text boxes and put on word limits.</p> <p>Need a ‘none’ or ‘other’ option; not all studies evaluate an intervention component, e.g., formative evaluation may provide non-component specific information that is, nevertheless, of great value.</p> <ul style="list-style-type: none"> ▪ Other results: select any other indicators not in forms above to share results. Will have dropdown menu of <i>Framework</i> indicators. <p>Do these include indicators other than those mentioned above? Seems to be an overlap between evaluation reports and the project results sections.</p> <ul style="list-style-type: none"> ▪ Formative and Process Eval Summary (R5.1): For each completed evaluation, appears to update table P4.1 and adds tools, results and conclusions, and actual uses of results. <p>Need one row per evaluation study, not one for all the formative and one for all the process evaluations.</p> <ul style="list-style-type: none"> ▪ Outcome and Impact Evaluation Design (R5.2): For each completed evaluation, appears to auto-populate w/ Table P4.2 and edit/add outcomes that were evaluated, all <i>Framework</i> indicators that were included, which of 7 data collection methods and names of all tools used or adapted (w/ citation or link when available), and which of 3 evaluation designs was used. If randomized, then whether by individual or another unit. ▪ Outcome and Impact Objectives, Analysis, Results, Conclusions and Dissemination Plan (R5.3): For each evaluation, new table shows: type, objectives and analytic methods, size of samples in pretest and posttest that completed each, any additional data collection, results and conclusions about Framework and other indicators, uses of results for intervention and dissemination in 5 venues (communities, conferences, papers, reports, other). <p>Instructions state Table R5.3 is auto-populated then edited from the Plan, but I did not see a table in the Plan that aligned with all components in the Report.</p> <p>I did not see any info on how they plan to aggregate and report this data.</p>
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6-1 (209-211)	Section 6. Challenges & Modifications to Plan	Text responses (250 words each), 1 per SA and SIA: <ul style="list-style-type: none"> ▪ Challenges ▪ Modifications ▪ Solutions to prevent/overcome <p>No comments received.</p>
218-229	Review IA Reports	No comments received.
230-244	Final Review	No comments received.
246-248	Miscellaneous Mockups	No comments received.
250-259	Lists	<p>The list on PSE setting should remove repetitive “Other” options.</p> <p>The list on data source should include the US census and American Community Survey.</p>



RECOMMENDATIONS FOR IMPLEMENTING THE NUTRITION EDUCATION AND OBESITY PREVENTION GRANT PROGRAM (SNAP-ED) PROVISIONS OF THE 2018 FARM BILL:

**A POSITION PAPER OF THE
ASSOCIATION OF SNAP NUTRITION
EDUCATION ADMINISTRATORS (ASNNA)**



ACKNOWLEDGMENTS

The Association of SNAP Nutrition Education Administrators (ASNNA) extends its appreciation to leaders from 21 states who participated in a workshop on implementing provisions of the SNAP Nutrition Education and Obesity Prevention Services Grant Program (SNAP-Ed) in the 2018 Farm Bill. The convening was held on February 3, 2020, in Alexandria, Virginia.

Workshop attendees were: Lola Adedokun (KY), Rebecca Bailey (DC), Kate Balestracci (RI), Pamela Bruno (ME), Casey Coombs (UT), Kathy Cunningham (MA), Molly DeMarco (FFORC/UNC), Celeste Doerr (PHI), Nora Downs (WA), Carrie Draper (SC), Dawn Earnesty (MI), Susan Foerster (CA-Ret), Jason Forney (MI), Karen Franck (TN), Suzanne Glen (GA), Lila Gutusky (MI), Becky Henne (MI), Teresa Jackson (OK), Sarah Kehl (CA), Kimberly Keller (MO), Caitlin Kownacki (IL), Deanna LaFlamme (MI), Heidi LeBlanc (UT), Theresa LeGros (AZ), Sue Sing Lim (KS), Anne Lindsay (NV), Sarah Misyak (VA), Barbara McNelly (CA), Doris Montgomery (IA), Sarah Panken (MI), Stephany Parker (OK), Aaron Schroeder (PEARS), Allison Teeter (PEARS), Nicole Walker (MD), Gail Woodward-Lopez (CA), and Nicholas Younginer (SC).

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EXECUTIVE SUMMARY

The Nutrition Education and Obesity Prevention Grant Program, better known as SNAP-Ed, is the nutrition arm of the United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP). SNAP-Ed is the largest single federal program that focuses on improving the Nation's health and well-being through the promotion of healthy eating, physical activity, and obesity prevention.

This position paper identifies ways that SNAP-Ed State Implementing Agency (SIA) members of the Association of SNAP Nutrition Education Administrators (ASNNA) recommend implementing six new provisions of the *Agriculture Improvement Act of 2018*, also known as the Farm Bill.¹ The 2018 SNAP-Ed requirements are for: a publicly available Annual State Report, an Annual Federal Report, an online information clearinghouse, technical assistance to states, electronic reporting systems (ERS), and the reporting of fiscal administrative expenses. This position paper provides details of each requirement, with recommendations and accompanying rationales.

The following summarizes the six new requirements in the 2018 Farm Bill with ASNNA's corresponding recommendations.

Publicly Available Annual State Report: *Each State Agency that delivers SNAP-Ed must submit an annual report that shall be made publicly available by the Secretary. It shall include a description of each project, an analysis of impacts and outcomes of each, the status of any multi-year projects, and the use of funds for administrative costs in eight categories.*

Recommendation 1: Establish an electronic template that uses the *SNAP-Ed Evaluation Framework* as a guide and is suitable for posting on a USDA website. The template should provide for a concise state report, prompt public availability, compliance with the Americans with Disabilities Act (ADA)/508 requirements, infographics, and text fields that limit the length of narrative content. The format and organization of the template should be standardized in a way that enables the reader to quickly locate information of interest and find similar information in the same location and presented in a similar fashion across states. The content should be designed to include information that can help populate relevant sections of the new Annual Federal Report and that can be supplied through state ERS.

Annual Federal Report: *The USDA Food and Nutrition Service (FNS), in consultation with the National Institute of Food and Agriculture (NIFA), must submit an Annual Federal Report to the Senate and House Agriculture Committees that evaluates the level of coordination between SNAP-Ed, the Expanded Food and Nutrition Education Program (EFNEP), and any other nutrition education program administered by USDA, and on the use of funds spent on such programs, including State Agency administrative costs in eight categories.*

Recommendation 2: As with the Annual State Report, the Annual Federal Report should be available to the public. This report should address statutory and Government Accountability Office (GAO) concerns; the unique impact of SNAP-Ed (including key metrics from the Annual State Report); coordination efforts among all federally-funded nutrition education programs; progress on strengthening technical assistance and the SNAP-Ed online clearinghouse; expenditures in the eight categories of State Agency (SA) administrative costs; and the dollar value of SNAP-Ed grants awarded to SAs and of contracts awarded by SAs to other contractors, if any. It should describe national FNS expenditures for SNAP-Ed support services specified in this statute, such as the advanced online clearinghouse, technical assistance and training, the ERS for state projects and SA fiscal expenses, and any federal contracts such as for evaluation, research, or pilot projects.

Online Information Clearinghouse: *USDA must establish an online clearinghouse with best practices for planning, implementing, and evaluating services appropriate to the SNAP-Ed target populations and make it widely available to state and local agencies, universities, and community organizations.*

Recommendation 3: Base the design of an advanced online clearinghouse on the expressed needs of SNAP-Ed and similar practitioners so as to increase the access and usability of data from federal and other sources in accord with the Federal Data Strategy and the Federal Evidence Act. Continue updating the current USDA websites and establish a new clearinghouse that provides a central source for population and system demographics and for relevant social determinants of health. Establish a searchable compendium of SNAP-Ed outcomes in peer-reviewed papers and the grey literature (reports, documents, data, and other materials self-published by governmental and other authoritative sources) at individual, environmental, sectors of influence, and population levels of the *SNAP-Ed Evaluation Framework*.

Technical Assistance: *USDA must provide technical assistance to State Agencies in developing state plans by identifying common challenges, coordinating efforts to address the challenges, collecting and disseminating information on evidence-based practices, facilitating communication between and among grantees and sub-grantees, and assisting State Agencies in creating or maintaining systems to compile program data.*

Recommendation 4: USDA, its seven FNS regions, and states should work together to develop an infrastructure with robust technical assistance capacity to provide ongoing subject-matter representation and models of exemplary peer programming, especially for outcomes in the *SNAP-Ed Evaluation Framework*. Cultural relevance and equity must be addressed across all topic areas. Technical assistance should integrate the latest theories, tools, and methods to understand, describe, and apply interventions that address the dimensions of disparity that influence SNAP-Ed eligible populations. USDA and states should assess SA and SIA training needs annually and establish a yearly training plan that aligns with the new *USDA Science Blueprint* and supports externally funded research strategies that build the science base for large-scale, community-based SNAP-Ed programming.

Electronic Reporting Systems for Projects in State Plans: State Agencies must describe in their state plan how they will use an electronic reporting system to measure and evaluate projects that are conducted through SNAP-Ed.

Recommendation 5: SAs and SIAs should maintain autonomy in their selection of customized ERS to manage state programs and to feed aggregated state information into the mandatory federal reporting system (Recommendations 1, 2, and 6). Technical and fiscal support for the state-level ERS should be provided to assure consistency, aggregability, and quality. Any required federal reporting should draw from and include key information from reports described in Recommendations 1 and 2 and not require additional reporting on the part of the states.

Electronic Reporting of Fiscal Administrative Expenses: State Agencies must describe in their state plan how they will use an electronic reporting system to account for allowable State Agency administrative costs in eight specific categories: salaries and benefits, office supplies and equipment, travel, nutrition education materials, professional activities, lease or rentals, maintenance and repair, and indirect costs.

Recommendation 6: Update the budget categories used in the SA state plan and Annual State Report with the eight categories required by statute. Add a ninth cost category for grants that SAs award to SIAs and, where applicable, for SA contracts to any specialized vendors for statewide support services to the SIAs. Technical and fiscal support for state-level ERS should be provided to assure quality fiscal reporting.



BACKGROUND

The United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP) is by far the largest component of the Nation's nutrition security system. In 2019, SNAP provided about \$56 billion in electronic benefits for food to an estimated 36 million Americans experiencing very low income.² As the nutrition arm of SNAP, the Nutrition Education and Obesity Prevention Grant Program, better known as SNAP-Ed, is intended to help two similar audiences make healthy food and physical activity choices consistent with the *Dietary Guidelines for Americans (DGA)*.³ The first group is SNAP-eligible people – those with incomes below 130% of the Federal Poverty Level (FPL). The second is people with slightly higher incomes (below 185% of the FPL) who qualify for other federal assistance programs, such as child nutrition, senior meals, and the Women, Infants, and Children (WIC) program. To reach these groups, SNAP-Ed targets settings, sites, census tracts, media outlets, and communities where most persons have low incomes. In 2018, about 87 million people with low incomes were income-eligible for SNAP-Ed, which was 27% of the US population.⁴ The 2021 appropriation for SNAP-Ed is \$448 million, or about \$12 per person annually.⁵

State social service departments serve as the SNAP State Agencies (SAs) that, in 2021, will administer SNAP-Ed grants to over 160 diverse State Implementing Agencies (SIAs) in all 50 states, the District of Columbia, and the Territory of Guam.⁶ SIAs include universities, non-profits, state health and agriculture departments, and Indian tribal-serving organizations. In turn, many SIAs sub-contract with other organizations that can deliver local or specialized services to diverse segments of the low-resource population, to regions within a state, and to communities where the majority of residents have low incomes. SNAP-Ed is the largest single federal program that focuses on improving the Nation's health and well-being of low-income people through the promotion of healthy eating, physical activity, and obesity prevention.⁷ It does so in partnership with public, non-profit, and business sectors at the state, tribal, and community levels.

SNAP-Ed is extensive, far-reaching, and has widespread support. Although the *2010 Healthy, Hunger-Free Kids Act*⁸ capped the annual appropriation at its 2009 funding level (with a Consumer Price Index adjustment for inflation), the number of SNAP-Ed grantees has grown markedly since the cost-sharing Federal Financial Participation mechanism was replaced by grants to states. From 2010 when about 100 SIA's participated, by 2021 the number of SIAs had grown to 160. The latest available data show that in 2017, states reported providing policy, systems, and environment (PSE) supports in nearly 80,000 low-resource sites.⁹ In 2018, 3.8 million people participated in direct education,⁷ and 61 social marketing campaigns were conducted in 31 states and the Territory of Guam.¹⁰

SIAs deliver evidence-based and science-informed, long-term, comprehensive, multi-level interventions based on each state's assessment of its own needs and resources.⁵ SIAs and their sub-recipients provide direct education across the age spectrum. They help coordinate PSE initiatives in low-resource communities and deliver social marketing campaigns aligned with the needs of the people they serve. By developing and evaluating new interventions that support underserved groups, taking them to scale, and working to sustain them over time, SNAP-Ed has become the Nation's largest single laboratory of innovation for large-scale, population-oriented approaches that promote healthy eating, physical activity, and obesity prevention. Developing diverse approaches tailored to low-resource settings, disseminating new knowledge, coordinating efforts within and among states, strengthening evaluation and reporting, and fostering peer support and technical assistance are long-standing focus areas within SNAP-Ed. Most recently these functions were codified by the Agriculture Improvement Act of 2018, also known as the Farm Bill.¹

The Association of SNAP Nutrition Education Administrators (ASNNA) represents professionals from SIAs and SAs that administer, implement, and evaluate SNAP-Ed programs. As an all-volunteer organization, ASNNA has worked in partnership with the USDA's Food and Nutrition Service (FNS) to develop cutting-edge, results-driven, theory-based resources such as the *SNAP-Ed Evaluation Framework and Interpretive Guide*¹¹ and the *SNAP-Ed Toolkit*¹² which provide dynamic practitioner resources for the Nation. SIAs were instrumental in identifying and establishing consensus on the 51 outcomes in the *SNAP-Ed Evaluation Framework* that have become the backbone for evaluating SNAP-Ed programming for individuals, environmental settings, sectors, and population segments.^{13, 14}

Health and well-being of all people and communities are essential to a thriving, equitable society. ASNNA supports SIAs by disseminating timely information, providing a venue for coordination and problem-solving, and advancing large-scale efforts to eliminate diet and physical activity disparities in low-resource settings. ASNNA conducts a periodic census of SIAs to identify and track current evaluation practices.¹⁴ The Association convenes committees and working groups to address policy topics that affect program administration, implementation, and evaluation. ASNNA members are committed to pursuing racial, social, and economic justice by working with others and conducting programs that reflect cultural competence, inclusivity, and advocacy for PSE changes that improve health equity.



METHODS

In July of 2019, the ASNNA Evaluation Committee engaged its members to study and discuss options for implementing the six statutory requirements enacted in 2018 and to examine recommendations of the Government Accountability Office (GAO) about actions needed by USDA nutrition education programs.⁷ They reviewed the program's history, past evaluations, and states' reporting experiences.¹⁵⁻²¹ A workshop in February 2020 brought together 40 ASNNA leaders to compile and prioritize recommendations. A writing team then integrated and provided iterative opportunities for committee members to refine the recommendations. Finally, representatives from the Social Marketing, Advocacy, and State Agency membership of ASNNA reviewed and advised on the recommendations. The writing team also considered policy recommendations of authoritative organizations²²⁻²⁷ and of the USDA-funded project, *SNAP-Ed Data Improvement: Agenda and Action Plan*.²⁸ In response to the COVID-19 pandemic and increased nationwide racial justice conversations, recommendations in the position paper were reviewed to assure that they lift up principles and practices that are innovative, inclusive, equitable, and socially just.



PUBLICLY AVAILABLE ANNUAL STATE REPORT

THE NEW REQUIREMENT:

Each State Agency that delivers SNAP-Ed must submit an annual report that shall be made publicly available by the Secretary. It shall include a description of each project, an analysis of impacts and outcomes of each project, the status of any multi-year projects, and the use of funds for administrative costs in eight categories.

Key Recommendation 1:

States and FNS should work together to establish an electronic template for a concise state report that provides prompt public availability, compliance with the Americans with Disabilities Act (ADA)/508 requirements,²⁹ infographics (maps, tables, brands, icons, photos, anecdotes), and text fields that limit the length of narrative content. The format and organization of the template should be standardized in a way that enables the reader to quickly locate information of interest and find similar information in the same place and presented in a similar fashion across states. It should be suitable for posting on the USDA website. The content should be designed to include information that would populate a compelling, understandable, and impactful section of the new Annual Federal Report (Recommendation 2) with sections that can be retrieved from state Electronic Reporting Systems (ERS) (Recommendation 5).

Each Annual State Report would cover key information, using the *SNAP-Ed Evaluation Framework* as a guide.¹¹ It should focus on impacts and outcomes that are seen as changing people's lives and making the healthy choice the easy choice in low-resource environments. It should be designed to highlight the interplay of activities within and across community settings; show how interventions work together; and – through success stories – showcase systematic, large-scale, collaborative efforts that are emblematic of the SNAP-Ed approach.



The Annual State Report should accommodate states with any number of SIAs^A and be designed to:

- Use a template that includes indicators from the four levels of the SNAP-Ed Evaluation Framework: Individual, Environmental Settings, Sectors of Influence, and Population Results
- Display aggregable data when possible and incorporate key indicators and outcomes that may vary from state to state. Several template approaches that are in use now could guide development of the new state template³⁰⁻³²; one example is found at https://extension.usu.edu/fscreate/ou-files/2020-22-staff/2019_MPR_SWR_SNAP-Ed_Cross_Regional_Report.pdf.
- Define the term 'projects' at the state-level as clusters of interventions with common themes that reflect the integration of complementary, multi-level approaches and partnerships. This is intended to reduce the number of projects to a manageable quantity for reporting purposes without losing the richness and innovation of the multifaceted SNAP-Ed approach described in the *SNAP-Ed Evaluation Framework and Interpretive Guide*.¹¹
- To graphically demonstrate reach and partnerships, consider including a state map with each county and an overlay of Congressional districts showing locations of local agencies funded by the SIAs, the most commonly targeted sites, and/or population reach.
- Use plain language and avoid the use of jargon and specialized terms to make reports easily understandable by various audiences.
- Guide development of a new format for the required annual state plans, thus ensuring that annual planning is done with outcomes in mind and that objectives and outcomes are aligned.
- Populate relevant sections of the new Annual Federal Report, including a practical set of basic, aggregable statistics tailored to various types of projects.
- Create a compelling, understandable, and impactful section about state-level projects with process, outcome, and impact results for the most common community settings (Recommendation 2).



Projects can be defined at the state level based on clusters of interventions with common themes that reflect complementary, multi-level approaches, and partnerships.

^A In 2021, 26 states, the District of Columbia and the Territory of Guam had a single SIA while the average among the 24 other states was about 5 SIAs; 5 states had more than 8 SIAs. The *ASNNA 2021 Census of Intervention, Evaluation, and Reporting Activities Planned by SNAP-Ed Implementing Agencies*. Unpublished analysis.

Proposed Content of the Annual State Report Template



A. Background (1-2 pages) (1 per state):

- State approach and/or goals
- State needs, assets, challenges, inequities, and key demographic and health indicators of relevance to the SNAP-Ed mission
- SIA names, websites, and contact information

B. Projects, reach, outcomes, and impacts

- For states with multiple SIAs, a statewide overview of key projects, reach, outcomes, and impacts (2-3 pages)
- For all states, SIA-level summaries of projects, reach, outcomes, and impacts (maximum 10 pages per state)
 - Brief description or list of “projects” (i.e. thumbnail sketch)
 - Key behavioral and health outcomes and impacts (statewide, cross-project, and/or project-specific) drawn primarily from the SNAP-Ed Evaluation Framework
 - Coordination with EFNEP and any other nutrition education program administered by the USDA
 - Community impacts (PSE, coalitions, partnerships, etc.) also drawn primarily from the SNAP-Ed Evaluation Framework

C. Success stories (1-2 pages per SIA, maximum of 10 pages per state)

- Brief narrative highlights (with photos, graphics, testimonials, etc.) for select projects and/or approaches that are emblematic of SNAP-Ed in a given state, including cross-agency collaborations (e.g. State Nutrition Action Councils) and social marketing campaigns

D. Use of funds (1 page per state)

- The dollar value of the federal SNAP-Ed grant to the SA, including administrative costs in eight required categories; the total value of grants to SIAs; and, if appropriate, SA expenditures for contractors that provide specialized support such as evaluation, social marketing, training, or special projects

E. Appendices (optional and not part of the ADA-compliant template)

- Reports, publications, and other relevant documents deemed by the SA/SIAs to be of interest to the USDA

Rationale:

States want the major audiences for their report – Congress, in-state partners, and sub-recipients – to see attractive, short, timely, and easy-to-grasp reports that reflect the ways that SNAP-Ed tailors its programming for different state infrastructures, needs, and resources. However, SIAs conducted about 500 projects in 2016²⁰ and almost 1,000 interventions were reported in USDA's Education and Administrative Reporting System (EARS) in 2018,³³ so reporting on outcomes of every project is not feasible. The required annual state reports are already submitted to USDA electronically, but their narrative format, length, and content do not align with the new statute, nor do they easily comply with ADA/508 requirements for posting on federal websites. Therefore, a standardized template that limits the length and uses infographics to highlight key information will make it easier for diverse audiences to comprehend and locate information of interest, to draw cross-state comparisons, and to aggregate data. A review of similar USDA and Centers for Disease Control and Prevention (CDC) nutrition programs failed to identify any federal reporting system that could serve as a model for SNAP-Ed,^B so a fresh approach is needed.

The new, publicly posted Annual State Reports recommended here will illustrate accountability for achieving outcomes that are relevant to both the state and to the national SNAP-Ed effort. A format tailored for easy ADA/508 compliance will do so efficiently at lower labor and production costs.²⁹ Clear expectations about reporting will enable SAs and SIAs of all resource levels to plan ahead, collect the needed information, and compile it into statewide reports efficiently.

States implement a wide variety of projects and have different ways of measuring outcomes and impacts that are responsive to local needs, challenges, assets, and interests. Therefore, it is critical that states be involved in the process of developing, field testing, and continually improving the State Annual Report template so that it presents an accurate picture of each state's SNAP-Ed work.

Awarding grants to SIAs from different sectors – university, government, non-profit, and tribal – is a feature that distinguishes SNAP-Ed from many other nutrition assistance programs and often is not well understood as a program asset. About half the states fund multiple SIAs with different types of delivery systems that connect with diverse population segments, that offer services in different regions of the state, or that can deliver promising new approaches.^C A template that captures these strengths will showcase how SNAP-Ed reflects distinct state needs and resources, while highlighting synergies and avoiding any appearance of duplication. By so doing, SNAP-Ed is able to capitalize on the essential resources that SIAs from different sectors offer: infrastructure, reach, flexibility, and relationships. With the number of SIAs per state ranging from one to more than 10, a template approach provides for both a statewide overview and for each SIA to summarize its work. States with large numbers of SIAs may cluster results from similar types of agencies into 'projects' for reporting purposes.

^B ASNNA-conducted review of reporting systems for similar USDA and CDC programs (2020). Unpublished analysis.

^C The ASNNA 2021 *Census of Intervention, Evaluation, and Reporting Activities Planned by SNAP-Ed Implementing Agencies*. Unpublished analysis.

A standardized template also makes it possible to supply information for the new Federal Annual Report without imposing an additional burden on the states. Designing the template to feed the federal report would permit aggregation of information for project types that are common in multiple states, address statutory requirements, and illustrate SNAP-Ed's contribution to the public good. Information could be compiled for the most common SNAP-Ed settings and capture information about topical, unique, or innovative projects. Examples might include those that coordinate with SNAP Online Electronic Benefit Transfer,³⁴ Pandemic EBT,³⁵ agriculture initiatives like the Gus Schumacher Nutrition Incentives Project³⁶ and unexpected events such as COVID-19 or natural disasters.

A distinguishing strength of SNAP-Ed is its ability to capitalize on the diverse assets that SIAs offer, including infrastructure, reach, flexibility, and relationships.



ANNUAL FEDERAL REPORT

THE NEW REQUIREMENT:

The USDA Food and Nutrition Service (FNS), in consultation with the National Institute of Food and Agriculture (NIFA), must submit an annual report to the Senate and House Agriculture Committees that evaluates the level of coordination between SNAP-Ed, the Expanded Food and Nutrition Education Program (EFNEP), and any other nutrition education program administered by USDA, and on the use of funds spent on such programs, including State Agency administrative costs in eight categories.

Key Recommendation 2:

As with the Annual State Reports, the Annual Federal Report should be available to the public. This report should address statutory and GAO, and other policy concerns, namely:

- The unique impact of SNAP-Ed
 - Emphasize how the three approaches of SNAP-Ed – direct education, social marketing, and PSE change – work together to maximize and sustain results.⁵
 - Describe and illustrate how the *SNAP-Ed Evaluation Framework* promotes comprehensive, multi-level programs and strong evaluation efforts.¹¹
 - Provide key summary statistics such as reach, sites, and outcomes for selected SNAP-Ed projects.
 - Describe SNAP-Ed's contribution to FNS Key Performance Indicators.³⁷
- Coordination among nutrition education programs
 - Illustrate how SNAP-Ed, EFNEP, other USDA nutrition education efforts, and CDC programs with a similar mission work together to improve health outcomes for populations experiencing low income, such as through State Nutrition Action Councils.^{5, 7, 8, 25}
 - Describe collaborative efforts with the USDA Economic Research Service, National Institute of Food and Agriculture, the National Institutes of Health (NIH), and CDC.⁷
 - Include examples of successful, policy-relevant outcomes achieved through interagency coordination at the national and state levels.
- Progress on new requirements for an online information clearinghouse and technical assistance (Recommendations 3 and 4).
- FNS expenditures for SNAP-Ed nationwide support services specified in this statute, such as the advanced online clearinghouse, technical assistance and training, the new ERS, and other third-party contractors such as for evaluation, research, or pilot projects (Recommendations 4, 5, and 6).

- The dollar value of SNAP-Ed grants and contracts awarded by SAs to SIAs and to other contractors, in addition to reporting the eight categories of SA administrative costs (Recommendation 6).

To create the Annual Federal Report, it is recommended that relevant data and information from the publicly available Annual State Reports (Recommendation 1) feed directly into the new federal report. In other words, it is important to align the information between the state and federal reports to streamline reporting efforts as much as possible. The *SNAP-Ed Evaluation Framework* provides a useful guide to describe progress in capturing results, the value of SNAP-Ed's evaluation, and its role in nutrition and physical activity assistance efforts.¹¹

Rationale:

The new Annual Federal Report will be the single most important public-facing document that can track SNAP-Ed results. It should reflect the comprehensive, multi-level mission of SNAP-Ed, describe how the three SNAP-Ed approaches work together, and showcase its policy-relevant collective impact at the national and state levels. It must reflect concerns raised by the Office of Management and Budget (OMB)¹⁹ and the GAO, such as coordination with other federal nutrition education programs.^{7, 8, 17} It also should comply with the *Foundations for Evidence-Based Policymaking Act of 2018* (PL 115-435)³⁸ which calls for data from public programs to be made more accessible by non-federal users. It should convey the uniqueness of SNAP-Ed, its substantial impacts nationwide, and topical success stories from diverse populations and communities.

It is important to showcase the degree to which federal SNAP-Ed funds support diverse SIAs across the country, thereby creating a national infrastructure that fosters large-scale, cooperative work in communities with large proportions of residents experiencing low income.



ONLINE INFORMATION CLEARINGHOUSE

THE NEW REQUIREMENT:

USDA must establish an online clearinghouse with best practices for planning, implementing, and evaluating services appropriate to the SNAP-Ed target populations and make it widely available to State and local agencies, universities, and community organizations.

Key Recommendation 3:

Design an advanced online clearinghouse, based on the expressed needs of SNAP-Ed and similar practitioners, that increases access to and the usability of data about populations experiencing low income and by using federal and other sources in accord with the *Federal Evidence Act* and its *2020 Action Plan*.^{38, 39}

The advanced online clearinghouse should:

- Continue to update and align the two existing electronic clearinghouse sites – *SNAP-Ed Connection* and *SNAP-Ed Toolkit: Obesity Prevention Interventions and Evaluation Framework*^{11, 12} – with enhanced content, search features, and inter-connectivity. Regularly post state outcome and impact reports and newly published peer-reviewed journal articles.
- Provide a central source for population and system demographics that support planning and evaluation by agencies of all types at the national, state, tribal, and county levels. Increase efficiency by linking with other data sets so that the best available statistics for the 51 *SNAP-Ed Evaluation Framework* outcomes at the Individual, Environmental Settings, Sectors of Influence, and Population Results levels are easily available to users from diverse organizations. Work with the states as practice and science advance to maintain the *SNAP-Ed Evaluation Framework* as a living document.
- Include data on social determinants of health to support the SNAP-Ed mission.^{40, 41} This includes disaggregation of relevant social determinants by income, poverty level, age, race/ethnicity, education, occupational categories, and community safety. Ensure that data required for SNAP-Ed targeting of low-resource intervention sites and geographic areas are readily available as lists, dashboards, scales, or maps for locations including, but not limited to, schools, day care and early childhood education centers, afterschool programs, food retailers/grocery stores, census tracts, food deserts, parks, and open space.

- Update the clearinghouse regularly with information about population segments and geographic areas that are not low-income to allow comparisons with SNAP-Ed characteristics and tracking trends over time.

Rationale:

SNAP-Ed practitioners need ready access to the most current and often-specialized information sources for planning, implementing, and evaluating their multi-level programs. Excellence in SNAP-Ed programming requires access to a large body of emerging information tailored to low-income audiences and low-resource settings well beyond what is available in the two current clearinghouses.

Supporting Recommendation 3a:

Establish a searchable compendium of peer-reviewed and grey literature (reports, documents, data, and other materials self-published by governmental and other authoritative sources) for SNAP-Ed outcomes using an ecological approach that includes the Individual, Environmental Settings, Sectors of Influence, and Population Results levels. Identify, annotate, and enter results of evaluation and research studies into the new site. Include a synthesis of all impact and outcome studies reported by SIAs in their Annual State Reports to ensure equitable access to information and to maximize program funding.

Rationale:

Since its inception, SNAP-Ed has been an incubator that develops, tests, evaluates, and reports on innovative approaches to direct education, PSE changes, social marketing, and multi-sector initiatives. While several dozen evaluation reports have been published in the peer-reviewed literature,^{13, 14, 42-82} most of the know-how generated by SNAP-Ed is not readily available to the public. For example, although SIAs reported over 1,000 formative, process, outcome, and impact evaluation studies in their Annual State Reports between 2014 and 2016,²⁰ the findings have not been compiled. Similarly, results of more rigorous research on SNAP-Ed that was supported by other funds have not been collected as a sharable evidence base. Identifying large-scale, long-term approaches to improve health in underserved and disparate communities is complex, so insights learned through SNAP-Ed should be made widely available. A searchable compendium would enable practitioners to use evaluation results quickly and in advance of the lag time that is inherent to publication of formal reports or the peer-reviewed literature.

***Excellence in SNAP-Ed programming
requires access to a large body of
emerging information...well beyond
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clearinghouses.***



TECHNICAL ASSISTANCE

THE NEW REQUIREMENT:

USDA must provide technical assistance to State Agencies in developing state plans by identifying common challenges, coordinating efforts to address the challenges, collecting and disseminating information on evidence-based practices, facilitating communication between and among grantees and subgrantees, and assisting State agencies in creating or maintaining systems to compile program data.

Key Recommendation 4:

USDA, its regions, and states should work together to develop an infrastructure with robust technical assistance capacity to provide ongoing subject-matter representation and models of exemplary peer programming, especially for outcomes in the *SNAP-Ed Evaluation Framework*.¹⁰ Representatives from SAs, SIAs, designated liaisons from USDA agencies, FNS Regional Offices, CDC, National Institutes of Health, the Indian Health Service, and external experts such as those from the Nutrition and Obesity-Policy Research and Evaluation Network⁸³ and the Physical Activity Policy and Research Evaluation Network⁸⁴ should serve as subject-matter leaders and project officers for the development of technical assistance resources.

Topic areas may include, but are not limited to: conducting and aligning needs assessments with intervention planning; identifying and using surveys and reporting systems; measuring, monitoring, and evaluating the effectiveness of complex, multi-level interventions; developing synergy among intervention approaches; coordinating SNAP-Ed with other federal nutrition assistance programs; compiling multi-state reports; and attributing behavioral change, environmental changes, multi-sector outcomes, and population results to program interventions.^{13, 14} Cultural relevance and equity must be addressed across all topic areas and should integrate the latest theories, tools, and methods to understand, describe, and apply interventions that address the dimensions of disparity that influence SNAP-Ed eligible populations.

Rationale:

SIAs want to continually improve how they plan, implement, and leverage their funds to reach more people more effectively, communicate outcomes that address USDA and state priorities, and align with the *SNAP-Ed Evaluation Framework*.

Supporting Recommendation 4a:

USDA and states should assess SA and SIA training needs annually and establish a multi-component training plan that includes, but is not limited to, monthly webinars, weekly resource updates, orientation of new SNAP-Ed leaders, annual national and regional conferences, communities of practice, periodic subject-matter workshops, and consultations from subject-matter experts. The annual training plan should have multi-year, sequential objectives; be designed using formats that fit within the context of a demanding, dynamic program; and be offered at times, places, and frequencies that meet practitioners' wants and needs.^{10, 13, 14, 28}

Rationale:

Training should be responsive to emerging needs, address gaps in skills and knowledge, and align with the *SNAP-Ed Evaluation Framework*, evolving program guidance, and reporting requirements.

Supporting Recommendation 4b:

USDA and states should work together as part of the *USDA Science Blueprint*⁸⁵ to build the science for large-scale, community-based SNAP-Ed programming. Strategies may include:

- Contracting with economic experts to support the development of practical models that states can use to frame responses to questions about overall return on investment, cost effectiveness, and the social good attributable to SNAP-Ed.
- Conducting a meta-analysis, scoping, or systematic review in different categories of SNAP-Ed activity at least once every three years, as is done in many areas of public health.
- Commissioning national research projects with USDA, NIH, or foundation resources to examine essential and innovative components of the program.
- Organizing large-scale, national evaluations of SNAP-Ed using external funds, similar to the NCI review entitled, *5 a Day for Better Health Program Evaluation Report*,⁸⁶ the CDC evaluation of VERB™,⁸⁷ the CHOICES Project coordinated by Harvard University,⁸⁸ or the ecologic approach used by the Robert Wood Johnson Foundation to assess community change for active living in diverse, underserved communities.⁸⁹

These strategies should be funded at the national level, not from state allocation grants. They must be designed to consider the contextual environment, resources, and competitive conditions within which healthy food and activity choices are made in resource-constrained settings. They should identify what is working, new opportunities, and areas for improvement.



Rationale:

Dissemination and implementation science dictate a need for research to test approaches that help scale up and sustain effective, equitably delivered interventions.⁸⁹ Evaluation of real-world, multifaceted programs requires new and complex mixed-methods approaches that examine *SNAP-Ed Evaluation Framework* outcomes. While rigorous evaluation within states is encouraged in *SNAP-Ed*, additional funds for long-term and multi-state evaluations and research are needed to avoid reducing resources for program implementation. These and external studies will help to codify the evidence base, reduce unnecessary or repetitive evaluation activity, and develop consensus about interventions needed to bring program benefits to scale.

Training should be responsive to emerging needs, address gaps in skills and knowledge, and align with the *SNAP-Ed Evaluation Framework*, evolving program guidance, and reporting requirements.



ELECTRONIC REPORTING SYSTEMS FOR PROJECTS IN STATE PLANS

THE NEW REQUIREMENT:

State Agencies must describe in their state plan how they will use an electronic reporting system to measure and evaluate projects that are conducted through SNAP-Ed.

Key Recommendation 5:

States should maintain autonomy to select the customized electronic reporting systems (ERS) needed to manage state programs that also feed aggregate state information into the federal reporting system (Recommendations 1, 2, and 6). Technical and fiscal support for the state-level ERS should be provided to assure consistency, aggregability, and quality. Any required federal reporting should draw from and include key information from reports described in Recommendations 1, 2, and 6 and not require additional reporting on the part of the states.

Rationale:

States use electronic data systems for assessment, planning, implementation, evaluation, and dissemination. Since SNAP-Ed is a diverse program, it requires flexible reporting processes. States have invested in the creation and adoption of ERS that reflect the dynamic needs and diverse projects of their organization, mission, and communities. Supporting the maintenance and improvement of these existing ERS protects state innovation and investment. To minimize the burden on states, federal annual reporting requirements should align with the content of the Annual State Report template. SAs will design their ERS to feed into this template (which includes fiscal administrative expenses). These state-level reports will, in turn, provide content for the Annual Federal Report, streamlining the flow of data.

National support and technical assistance for the development and adaptation of state ERS will ensure that the data are consistent, aggregable, and reliable. USDA assistance in measuring and evaluating project reach, outcomes, and impact will improve capacity to comprehensively report on SNAP-Ed programming.

SNAP-Ed is a diverse program that requires flexible reporting systems.



ELECTRONIC REPORTING OF FISCAL ADMINISTRATIVE EXPENSES

THE NEW REQUIREMENT:

State Agencies must describe in their state plan how they will use an electronic reporting system to account for allowable State Agency administrative costs in eight specific categories: salaries and benefits, office supplies and equipment, travel, nutrition education materials, professional activities, lease or rentals, maintenance and repair, and indirect costs.

Key Recommendation 6:

Update the budget categories in the SA state plan and Annual State Report template with the eight categories required by statute and add a ninth cost category for grants and contracts. The new ninth category will display the entire award to each state, including for grants that SAs administer to SIAs and for contracts to any specialized vendors that provide statewide support such as social marketing, evaluation, or training. As with Key Recommendation 5, SAs and SIAs should maintain autonomy in their selection of ERS to report fiscal administrative expenses. Technical and fiscal support for state-level ERS should be provided to assure quality fiscal reporting.

Rationale:

To provide a complete picture of how funds are spent, the dollar value of grants for services to the public should be reported as a ninth category. This would include the dollar value of grants to the SIAs that develop, implement, and evaluate SNAP-Ed community services and to any additional contractors that the SA may engage to provide statewide support such as for evaluation, training and technical assistance, social marketing, or special projects. Aligning the Annual State Report template with the fiscal categories required by statute and designing the state-level ERS to include reliable fiscal information will ensure that requirements of the Farm Bill are met.



CONCLUSION

SNAP-Ed SIAs are committed to delivering programs that reflect state-of-the-science information, proactive technical assistance and training, dynamic evaluation, and timely public reporting. It is our hope that the recommendations in this position paper will be used to guide the implementation of the 2018 statutory requirements. ASNNA seeks to ensure that SNAP-Ed is modernized, empowered, and enabled to become a more readily available national resource that reaches more people, develops strong synergy among programs with similar missions, and is valued for its innovation, implementation know-how, responsiveness, and results.

The synergies caused by the parallel epidemics of infectious COVID-19 and non-infectious diet-related chronic diseases, including obesity, have serious national implications.^{3, 24-27} COVID-19 has strained the Nation's nutrition safety net and widened pre-existing health disparities among racial and ethnic groups, further demonstrating the importance of impactful SNAP-Ed programming.^{90, 91} Three-quarters of people killed by COVID-19 had at least one underlying condition, most of which were diet-related⁹¹ Post-COVID-19 estimates of household food insecurity were predicted to be 2.7 times higher in the spring of 2020 than in winter, rising from 8.7% in February to 23.0% by April/May of 2020.⁹² For households with children, rates are estimated at 29.5%, with prevalence in African American and Hispanic households even higher.⁹² These adverse impacts have both short- and long-term implications for the populations that SNAP-Ed serves.

Experts call for unified, urgent bipartisan action that will result in enduring, equitable, systemic changes.⁹¹ Among the recommended priorities are more integrated public and private safety net programs – namely government and private-sector food banks, food companies, and health care entities – reinvigorated regional food systems and local food chains that serve all communities, and support for state and local food policy councils.⁹¹ The SNAP-Ed focus on individuals, environments, systems, and public/private partnerships supports such approaches to strategic recovery, while also strengthening community resilience and public health capacity. Efforts to strengthen SNAP-Ed, in alignment with statutory requirements and as described herein, are critical and timely.



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