

Appendix I5. Public Comment #3

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General Comment

The two uploaded files are on behalf of the CalFresh Healthy Living Program (federally known as SNAP-Ed) in California. Concerns and recommendations placed within the Annual Report Form and State Plan Form are on behalf of the California Department of Social Services, Department of Public Health, California Department of Aging, CalFresh Healthy Living, University of California, and Catholic Charities of California.

Attachments

California State Plan Form Comments

California Annual Report Form Comments

Annual Plan Form (SNAP-Ed State Plan)

Section 1. Identify the Target Audiences and Their Needs

Pg. 3 (Section 1-2):

Concern: Does not have a place to specify disaggregation by race/ethnicity.

Recommendation: Include an area to provide this information.

Pg. 3 (Section 1-2; Table P1.1. State Information on Diet and Physical Activity Behaviors, Related Health Outcomes, and Food Insecurity):

Concern: The word “Measure” is the header in the third column, it indicates a known amount.

Recommendation: Use the word “Finding” or “Estimate” to indicate an approximate calculation.

Pg. 3 (Section 1-2; Table P1.1. State Information on Diet and Physical Activity Behaviors, Related Health Outcomes, and Food Insecurity):

Recommendation: For the Data Source column, recommend that Data Source is identified for (and linked to) each percent, with ability to enter more than one percent for measures with multiple data sources available.

Pg. 3 (Section 1-2; Table P1.1. State Information on Diet and Physical Activity Behaviors, Related Health Outcomes, and Food Insecurity):

Recommendation: For the Measure column, recommend including numerators and denominators as a way of determining the number of individuals on which each percent is based from.

Pg. 4 (Section 1-2; Table P1.1. State Information on Diet and Physical Activity Behaviors, Related Health Outcomes, and Food Insecurity):

Concern: Measurement column, rows 3-5 state “*Provide the measure and the units (e.g., 1.5, average daily cups). Measure: Unit:*”

Recommendation: Include numbers on which averages are based from.

Pg. 4 (Section 1-2; Table P1.1. State Information on Diet and Physical Activity Behaviors, Related Health Outcomes, and Food Insecurity):

Concern: Household Food Insecurity Row; this concept is too complex to obtain valid estimates based on general description of “household food insecurity.” For example, two states could report percent based on USDA food insecurity and very low food security, but they are measuring much different types of food insecurity in terms of severity and potential negative outcomes.

Recommendation: Removing or providing explicit instructions on what is needed to report, if required.

Section 2. State SNAP-Ed Action Plan

Pg. 12 (Section 2-2; Table P2.2a. Projects Linked to the State Objectives):

Concern: This table will not work for California. Most of our objectives are achieved across multiple planned projects – there will be a lot of repetition in this section.

Section 3. Planned Projects

Pg. 20 (Section 3-7; Direct Education and PSE Settings):

Concern: “Projects may be implemented in multiple settings, but no single project site should be categorized as belonging to more than one setting.”

Recommendation: Project site be defined by its *setting* rather than the *physical address* since a physical site can have *multiple* settings take place at a single site.

Pg. 21 (Section 3-8; Table P3.1. Direct Education and PSE Settings):

Concern: Table 3.1 is missing Indian Reservations under the Live Domain. Additionally, the Learn Domain does not include Colleges and Universities.

Recommendation: Add Indian Reservations under the Live Domain in table 3.1. Given that Colleges and Universities seem to be a priority, we suggest adding that setting under the Learn Domain.

Pg. 22 (Section 3-9; SNAP-Ed Toolkit Interventions):

Concern: “Will the intervention be adapted for this setting or target population?”

Question: Require more information/clarification as to what this means?

Section 6. Planned Staffing and Budget

Pg. 36 (Section 6-1; Table P6.1. Planned Staffing):

Question: How are in-kind positions indicated in this section?

Pg. 36 (Section 6-1; Table P6.1. Planned Staffing):

Concern: “Attach a document with brief job description here.” Providing job descriptions for all positions will be very time consuming for all agencies.

Recommendation: Job descriptions will be provided only for newly added positions as has been the past practice for California SNAP-Ed. All other job descriptions will be made available upon request.

Pg. 38 (Section 6-3; Table P6.2b. Planned Project Budgets):

Concern: Cost of publicly owned building space and Institutional memberships and subscriptions are Direct Cost Categories.

Recommendation: We currently have those two items lumped into *Building/Space lease or rental* and *Maintenance and repair*. Recommend we leave in the two current categories (*Building/Space lease or rental* and *Maintenance and repair*).

Pg. 40 (Section 6-5; Table P6.2d. Planned Total Budget):

Question/Concern: What is the significance of reporting Other Planned Public and Private Funding (non-SNAP-Ed)? It does not seem necessary to report this level of information if non-SNAP-Ed funds are not used for SNAP-Ed programming.

Recommendation: California SNAP-Ed IAs have not historically reported on non-SNAP-Ed funding. This information should not be required to report.

Pg. 42-43 (Section 6-7 and 6-8; Table P6.3a. Planned In-State Travel and Table P6.3b. Planned Out-of-State Travel):

Concern: There is inconsistency among requested information for In-State and Out-of-State travel. Registration fee, Grounds transportation, and mileage are not consistent on each form.

Recommendation: The tables for Out-of-State Travel and In-State Travel should be revised to collect the same information for any SNAP-Ed travel-related costs.

Pg. 42-43 (Section 6-7 and 6-8; Table P6.3a. Planned In-State Travel and Table P6.3b. Planned Out-of-State Travel):

Question: Will In-State & Out-of-State Travel Justification Templates still need to be completed? Tables P6.3a. and P6.3b. appear to collect the necessary information. Completion of the justification templates will create additional, duplicative work.

Additional Concerns Regarding Guidance and Reporting System Requirements:

- Unclear of what is required versus what is optional within the State Plan Form.
- The plan form does not set programs up to report against specific metrics. If FNS is requiring States to report against predetermined indicators, States lose the ability to set needs assessment-driven goals and objectives sensitive to the needs of communities.
- Word limits are limiting and completing text boxes introduce a lot of inconsistency in what is captured. It is unclear how that information will be aggregated and used.

Annual Report Form (SNAP-Ed Annual Report)

[Section 2: Coordination And Collaboration \(pg. 2-1 to 2-5 or 3-7 in pdf\)](#)

Engagement with Multisector Partnerships/Coalitions (ST8) (pg. 5)

Table R2.2 Engagement with Multisector Partnerships/Coalitions (ST8) (pg. 2-3 or 5 in pdf)

Concern: This will be a very large table for California, as each state and local agency will have multiple coalitions, which will diminish its utility for FNS review and will be burdensome to manually enter at the state level.

Recommendations:

- 1) Add ability to auto populate from PEARS so local agencies can log their data directly, given the volume of information required.
- 2) Remove open text field to reduce reporting burden.

[Section 3: SNAP-Ed Financial Reporting \(pg. 3-1 to 3-4 or 8-12 in pdf\)](#)

SNAP-Ed Implementing Agency Expenditures, SNAP-Ed Project Expenditures (pg. 3-1 and 3-2 or 8-9 in pdf)

Tables R3.1a Implementing Agency Expenditures and R3.1b. SNAP-Ed Project Expenditures (pg.3-1 and 3-2 or 8-9 in pdf):

Concern: Agencies use carry in throughout the year. It is unclear if expenditures are to include both carry in and current award.

Recommendation: Clarify if expenditures are to only include the current award or to also include carry in regardless of funding year.

[Section 4. Project Results \(pg. 4-1 to 4-22 or 12-33 in pdf\)](#)

Concern: There is no table in which to report on progress toward state objectives (see Annual Plan Table P2.1 State SNAP-Ed SMART Objectives and Performance Indicators for State Priority Goals).

Recommendation: Add a table to track overall statewide progress toward SMART objectives.

Project Detail (pg. 4-1 to 4-2 or 12-13 in pdf)

Table R4.1. Project Approaches (pg. 4-1 or 12 in pdf)

Concern: Unclear if all PSEs are to be recorded here or just those at or past the implementation stage.

Recommendation: Change to “PSE” instead of “PSE change” to capture planning stages and not just implemented changes.

Project Sites (pg. 4-4 or 14 in pdf)

Table R4.2. Project Sites (pg. 4-3 or 14 in pdf)

Concern: In FFY 21, there were 2302 sites in California that did PSE or DE so there will be many rows in this table, which will be time consuming to complete and may have limited utility for FNS given the size and level of detail.

Recommendations:

- 1) Report summary information instead of site-specific information. For example, could report overall by settings (e.g. for setting of schools: how many received SNAP-Ed programming, how many within tribal jurisdiction, how many were urban/suburban/rural frontier, etc.). Additionally, PEARS already offers a number of Impact Dashboard and Indicator Metrics summary reports that could be used for statewide and nationally summary.
- 2) Auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

Direct Education (pg. 4-4 to 4-11 of 15-22 in pdf)

Stage (pg. 4-4 or 15 in pdf)

Concern: California does not currently track direct education that has not yet been implemented and is unclear on the utility of doing so.

Recommendation: Consider how this information will be used and if its purpose justifies the reporting burden.

Language (pg. 4-4 or 15 in pdf):

Concern: In FFY 21, there were 5,755 direct education interventions in California. It is burdensome to enter language for each individual direct education intervention at the state level.

Recommendation: Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

Table R4.3: Direct Education Reach (pg. 4-6 or 17 in pdf)

Concern:

- 1) This level of detail is not currently collected in PEARS, and it will be burdensome to manually enter at the state level.

Recommendation:

- 1) Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

Concern:

- 2) Participants provide their demographic information on a voluntary basis and may not be comfortable giving their demographic information for each category indicated (age, gender, ethnicity, race)

Recommendation:

- 2) Each item should have a “prefer not to state” response category to honor participants decision not to provide demographic information.

Concern:

3) Age: It may be confusing to include grade and age since some student' age doesn't always align with assumed age groupings. Could be simplified to just refer to age. PEARS does not currently collect all these age groupings.

Recommendation:

3) Age: Simplify to report only on age, not grade. Recommend age categories be added to PEARS.

Concern:

4) Gender: The proposed three responses categories are not mutually exclusive since someone can be transgender and identify as female or male. Similar to California legislation Gender Recognition Act (SB-179) passed in 2017, the University of California must provide the minimum three equally recognized gender options ... woman, man and nonbinary."

Recommendation:

4) Gender: University of California Agriculture and Natural Resources, the institutional home of University of California Cooperative Extension has adopted a gender recognition and lived name policy with five gender options – woman/girl, man/boy, nonbinary, gender identity not listed above and prefer not to state. We recommend these five response categories be used.

Concern:

5) Totals, such as that for the "corner row total", will only be consistent if a "prefer not to state" category is added.

Recommendation:

5) Add "prefer not to state" response category for each demographic category.

Mode of Delivery (pg. 4-7 or 18 in pdf)

Concern: It is burdensome to enter information for each direct education intervention's mode of delivery at the state level.

Recommendation: Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested. Additionally, of course, states and implementing agencies should only be required to report on indicators that are covered by the curricula being implemented.

Individual Behavior Change (MT1, MT2, MT3) (pg. 4-8 or 19 in pdf)

Concern: It is unclear if states are required to report on all indicators listed, all indicators covered in curriculum, or just indicators that we currently are collecting data on.

Recommendation: Require states to only report on indicators that they are currently measuring rather than requiring data for all listed indicators. This will allow for states to compare data to previous years, rather than switching to a new tool.

Table R4.4a. Healthy Eating Outcomes (MT1) Among [Age Group] (pg. 4-8 or 19 in pdf)

Concern: Under "Specified Metric at Pretest" column, it is unclear what meeting the guideline means for eating more than one kind of fruit/vegetable throughout the day or week and for consumption of sugar sweetened beverages. The Food Behavior Checklist reports the frequency of eating more than one fruit or vegetable each day (never, sometimes, often, always), drinking soda and fruity, sports, and punch drinks. CA is not aware of a validated tool that measures all of the indicators as listed.

Recommendation:

- 1) Provide clarification on what it means to meet the guidelines.
- 2) If required, provide technical assistance on what validated tools measure all metrics specified here.

Policy, Systems, and Environmental Change Initiatives (pg. 4-11 to 4-14 or 22-25 in pdf)

Tables R4.7. PSE Changes Maintained This Fiscal Year and R4.8. PSE Changes Adopted This Fiscal Year (pg. 4-11 or 22 in pdf)

Concerns:

- 1) Separate tables for R4.7 and R4.8 are not consistent with how PEARS collects data. Reach at a site is not reported separately by PSE change so while the form references PEARS guidance the table set up is not consistent with PEARS guidance. Producing these tables would require major change to the PEARS PSE module and as importantly, considerable retraining of PEARS users.
- 2) These will be an extremely large table as in FFY 21, California had 1,116 PSE sites throughout the state and a total of 3,563 PSE changes. This is likely to be of limited utility to FNS and will create a high reporting burden for the state agencies.
- 3) For the “Type of PSE Change Maintained Column” and “Type of PSE Change Adopted” columns, PEARS does not collect reach and stage of implementation for each PSE change, so this information will be burdensome to report given the large number of sites and PSE changes.

Recommendations:

- 1) Suggest using single table for PSE changes actively maintained or newly adopted with no need to report reach by type of change or to refer back to previous year’s reporting
- 2) Suggest instead a summary table of the number of different sites/settings where PSE changes were adopted or actively maintained and a count of the number of sites/settings by PSE change. Summary information seems much more useful than very long tables with rows for each site and each PSE change. PEARS also currently includes auto-generated Impact Dashboards and SNAP-Ed evaluation framework indicator summary tables.
- 3) Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

Table R4.9. PSE Active Partner Details (pg. 4-13 or 24 in pdf)

Concerns:

- 1) Reporting does not include direct education and social marketing partners.
- 2) Without auto-population for “Partner(s) Geographic Level” column, there will be extensive manual entry required.
- 3) This list of partner types in “Partner(s) Contributions” column does not match what is in PEARS. PEARS established their list of partner types in consultation with states through the PEARS Advisory Committee.

Recommendations:

- 1) Recommend also reporting on partnerships for direct education and social marketing, like the PEARS Partnerships Module currently does.
- 2) Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.
- 3) Align list of partner types with PEARS.

Social Marketing Campaigns (pg. 4-15 to 4-20 or 26-31 in pdf)

Table R4.10. Potential Reach by Market Segment (pg. 4-17 to 4-18 or 28-29 in pdf)

Concern: Market segments overlap and would be difficult to report

Recommendation: Recommend that it not be required to report on every market segment listed.

Table R4.11 MT12b: Reach and Impressions by Channel (pg. 4-19 to 4-20 or 30-31 in pdf)

Concerns:

1) Reach can be reported in different ways through different methods for each channel, yet there is only the option to report one source.

2) California uses additional social media platforms besides those listed.

Recommendations:

1) For sources, recommend option to use more than one source.

2) Add an "other" option for types of social media.

Indirect Education Channels (pg. 4-20 to 4-21 or 31-32 in pdf)

Concern: Unclear what "indirect education channels" refers to.

Recommendation: Provide definition on what channel means in this context

Language (pg. 4-20 or 31 in pdf)

Concern: This information is not currently captured in PEARS. Recommend this be added to reduce burden.

Recommendation: Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

Indirect Education Channels: Channels (pg. 4-20 to 4-21 or 31-32 in pdf)

Concern: This list of partner types does not match what is in PEARS. PEARS established their list of partner types in consultation with states through the PAC.

Recommendation: Suggest the common channels reported in the PEARS Indirect Education module be added to the list of channels such as "community events".

[Section 5. Evaluation Report \(pg. 5-1 to 5-4 or 23-37 in pdf\)](#)

Project Evaluation Overview (pg. 5-1 to 5-4 or 34-37 in pdf)

Table R5.1. Formative and Process Evaluation Summary: Project Components Evaluated (pg. 5-3 or 35 in pdf).

Concerns:

1) Not all evaluations are completed within one fiscal year, so we will not be able to complete the last two columns in some cases.

2) "Project Components Evaluated" column does not include all possible components for evaluation (example: dietary behaviors of the SNAP-Ed eligible population)

Recommendations:

- 1) Add option to select whether or not the evaluation was completed.
- 2) Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

Formative evaluation may provide non-component specific information that is nevertheless of great value.

[Section 7. Success Stories \(pg. 7-1 to 7-1 or 39-41 in pdf\)](#)

Background (pg. 7-1 or 39 in pdf)

Concern: This information is not currently captured in PEARS. Recommend this be added to reduce burden.

Recommendation: Add ability to auto populate table from PEARS so local agencies can log directly, given the volume of information requested.

[Overarching Concerns](#)

Volume of Information Collected

Concerns: The amount of new information and level of detail that states are now required to report is highly burdensome, requiring many additional staff and taking vital time away from program planning, implementation, and evaluation. It is also unlikely that large states will be able to complete the report form by January 31. It is unclear how much detailed information is of utility to FNS, as the size of the tables will be extensive and will not capture summary information that can easily be aggregated or communicated. For example, in FFY21, California had 1,116 PSE sites throughout the state and a total of 3,563 PSE changes, and Table R4.2 would require a separate row for each site and individual lines for each PSE change within the rows. Additionally, much of this information is required to be entered manually. The cost of this effort would be a large burden, resulting in high labor costs due to the limited resources available to handle this manual process. This is also concerning because it is not clear how the details will be used to characterize the great work that SNAP-Ed is doing nationally.

Recommendations: Create tables for summary information instead of granular information and limit the fields that are required to be entered manually. The PEARS indicator metrics tables and impact dashboards include types of summary data that is useful for understanding and communicating work across the state (example: number of site/settings that adopted each type of PSE change) and can be easily aggregated across the SNAP-Ed program. Summary tables without fields for manual entry would both reduce reporting burden for state agencies and improve the utility of information for FNS.

Alignment with PEARS

Concerns: The required tables do not align with PEARS, so it is not possible to auto populate the data. PEARS allows local agencies to enter their own data throughout the fiscal year, which is

cleaned by state agencies, and the inability to do so would greatly burden state staff, particularly for fields requiring manual entry. Additionally, relying on the State Plan for auto population may not yield accurate information, as interventions are locally developed and modified to meet needs throughout the year.

Recommendations: Give states the option to auto populate data from PEARS so that local agencies can directly enter data in a format consistent with the Annual Report form. Additionally, the auto population of data from PEARS will be more accurate than the auto population of data from the State Plan since PEARS data represents work completed rather than work planned.

Required Indicators

Concerns:

- 1) The State Plan form does not set programs up to report against the indicators in the Annual Report Form but rather requires states to set SMART objectives based on their needs assessments. The Annual Report form does not require reporting on these objectives but instead on predetermined indicators that may not align with the needs assessment.
- 2) It is unclear which indicators states are required to report on and which are optional.
- 3) It is unclear what guidelines FNS is referencing when requiring states to report on whether participants met the guidelines. For example, for MT1, the Dietary Guidelines for Americans does not have a specific guideline for sugar sweetened beverages or number of times per day fruit and vegetables are consumed.

Recommendations:

- 1) Align the State Plan with the Annual Report form by including reporting on state developed SMART indicators.
- 2) Allow states to select which of the predetermined indicators they will report on according to their programs, which have been designed in response to needs assessments.
- 3) Provide the guidelines that FNS references in the tables and provide technical assistance on what validated tools are available to measure these indicators.

Timeline for Use of Annual Report Form

Concern: There is very little time to update processes before October, such as finding validated surveys that capture indicators in the way FNS requires, updating demographic data collection sheets, completing translations, and training staff to collect and enter data through the new system; therefore, California will be unable to accurately report FFY 23 data using the Annual Report form. Additionally, since many areas of the Annual Report form auto populate from the Annual Plan, manual entry of many thousands of rows of data will be required in FFY 23 that will auto populate in following years. This will create an extremely high reporting burden, leading to the redirection of many staff away from program planning, implementation, and evaluation.

Recommendation: Postpone the first year the Annual Report form is required to FFY 24 so that it follows use of the State Plan form so that states can prepare to provide accurate data and so information can auto populate from the State Plan or updated PEARS.