

Appendix I7. Public Comment #4

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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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General Comment

The Michigan Fitness Foundation respectfully submits comments in response to the following notice from USDA: Agency Information Collection Activities: Proposed Collection; Comment Request-Supplemental Assistance Program Education and Obesity Prevention Grant (SNAP-Ed) National Program Evaluation and Reporting System (N-PEARS). Please see the attached letter and summative comments table.

Attachments

Michigan Fitness Foundation Federal Register Comment Letter

Michigan Fitness Foundation Summative Comments - Federal Register Response

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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:

Michigan Fitness Foundation (MFF) 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.

At the national level, SNAP-Ed is implemented through a variety of models that best meet state and local needs. This diversity of models is especially relevant in Michigan. The Michigan model includes two State Implementing Agencies; one SIA has geographic spread and centrally hires educators to do state-wide program delivery and one SIA, MFF, concentrates service in areas of highest need by contracting with local and regional organizations to deliver SNAP-Ed.

MFF is the backbone for more than 50 Michigan-based organizations that deliver comprehensive, evidence-based nutrition education and physical activity programming both down and across the levels of the SNAP-Ed Evaluation Framework. These 50 Local Implementing Agencies (LIAs) are embedded in the communities they serve and are uniquely positioned to understand and act on evolving local needs as well as provide an element of sustainability within the community. All LIAs use a collaborative, multi-sector partnership and planning approach to empower healthy diets, improve access to healthy foods, and advance safe places for physical activity, all through a locally translated lens of equity and diversity. This powerful SNAP-Ed program model, coupled with MFF's customized, expert technical assistance, optimizes the impact as well as maximizes reach of SNAP-Ed. In FY 2021, MFF-funded SNAP-Ed programs and activities reached approximately four million Michigan residents.

We recognize this formative e-system is mandatory and time-sensitive and we also appreciate the need for all agencies to tell the story of a publicly funded program to all levels of stakeholders. MFF's current plan and reporting paradigm is already designed to efficiently do just that at the state level. For a program to be effective, a careful balance between administration and programming is necessary. The increased burden of the proposed e-system coupled with potential heavy reliance on national level contractors, steps over state level experts and siphons limited dollars away from services to participants and their communities. The proposed e-system will require significant reinterpretation nationally to be truly useful to the agency.

Our concerns with the proposed e-system generally fall in the areas of: does not represent the diversity within SNAP-Ed; new layers of administrative burden with multiple duplicate entries and overlapping roles; data incongruent with the SNAP-Ed Evaluation Framework; lack of integration of mixed method evaluation; definitions and instructional text require clarification and editing; excessive data reporting considered to be excessive due to lack of a public dashboard and framework storytelling at a bigger picture level; absence of community and participant voice in both needs assessment and reporting; promotes homogenizing rather than celebrating the diversity of the program; and the inequity of regressing to the mean, thereby muddling diversity and reverting to times of token inclusion.

Given the time constraints of the review period, MFF is submitting for your consideration high-level responses to the posited questions in the Federal Register and are including, as an attachment, a table of some additional comments about the 400 pages of materials available for review. Specific recommendations for technological solutions are not included because of time constraints and lack of access to explore the proposed e-system.

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

The proposed e-system collects a volume of information that is likely unnecessary and has limited practical utility at this stage of development given that no external-facing outcome reporting, such as a public dashboard, has been designed.

- It is a truism in equitable evaluation and reporting that participants should not bear the burden of excessive data collection when there is no clear plan for its use. The proposed process does not appear to have begun with the end in mind and will require significant interpretation to SNAP-Ed personnel and the public.
- Information only has practical utility if equitable data aggregates can be identified.
- If using public data sources, why does each state need to collect those data? They can be summarized at the national level and provided to states, thereby creating an efficiency for states so they can instead focus on adding locally relevant data that informs a community-based needs assessment.
- Given how SNAP-Ed is implemented throughout a diversity of state models, the new proposed plan and report forms do not seem to reflect current SNAP-Ed practices and, without additional input, have a limited chance of telling stories of program impact.

(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 data in the *SNAP-Ed N-PEARS_BurdenTbl* are insufficient to provide input on where the inaccurate estimates may be.

- The assumptions in the nonprofit category of agency types do not fit our reality as a nonprofit. Need to incorporate additional sources and variety of professional

roles engaged. The current labor market demands compensation at rates analogous to state employees and universities to engage qualified staff with necessary levels of expertise.

- Given the time constraints and the fact that the SA needs to start the process, MFF has not been part of the small group of states and SIAs involved in providing more specific feedback about the user experience or had the opportunity to engage in the community preview opportunity.

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

The magnitude of the proposed e-system and limited review time frame preclude deeper meaningful feedback.

- Definitions throughout the proposed plan and report forms are not clear, assuredly leading to misinterpretation of and inconsistency in what is collected and input into the e-system. We recommend an improved feedback loop structured so that we can both collect and aggregate information consistently nationally. The proposed e-system needs process evaluation, a critical best-practice that has been skipped. MFF's summary table includes more examples of instructions that can be misconstrued and misinterpreted. A prime example is the definition of projects, which based on conversations with state and national level colleagues in being interpreted differently. This lack of clarity in definitions will cascade into uninterpretable data.
- The narrow scope of evaluation methods and survey types included in the proposed e-system limits storytelling. The heart of SNAP-Ed relies on community-rooted information as part of evaluation to best situate programming and technical assistance. The proposed e-system removes the opportunity to lift up community voice in evaluation. As SNAP-Ed matures, a mixed method approach to evaluation is essential.
- Program requirements tie to monitoring. The proposed e-system does not appear to support the capacity of the agency to monitor while maintaining the balance between efficient administration and maximum programming.

(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.

The strength of SNAP-Ed is in its diversity with a variety of models of program delivery. To answer this question, we would willingly participate in a collective process on how to minimize the significant burden already identified.

- MFF uses a web-based data collection system to collect and compile information from more than 50 LIAs. It will be essential to develop an application programming interface (API) to streamline entry into the proposed e-system before any system is required.
- MFF's 50+ LIAs use multiple direct education interventions and policy, system, and environmental change (PSE) strategies. The proposed e-system will require entering the level of evidence for an intervention multiple times if that intervention is being used with more than one project. Theoretically, this

requirement could result in an intervention being entered between an estimated 50 to 1,100 times if translated per site.

- Key to SNAP-Ed's effectiveness is using public health approaches at broader levels. The project and site focus of reporting introduces duplication of information entry for systems-level changes that impact multiple sites. If it is decided that this level of data reporting has a purpose, having auto-population features as part of the e-system forms will reduce duplication in information entry.
- Per the advice of both our SA and FNS regional consultant, Michigan's FY 2023 plan was developed using the templates in the FY 2022 Guidance because we are in the third year of a multi-year plan. If required to use the proposed report form for FY 2023 final reporting, all of the information and data will need to be manually collected and input into the new report forms. Roll out of these types of national systems need to be thoughtful of diverse program cycles.

The proposed e-system does not yet represent better tools in its current stage of development. Tools that package results in a way that resonate with the public and decision makers require time, intention, and feedback from stakeholders, incomplete in the process to date. Specific issues include:

- The focus on quantitative data and numbers coupled with the lack of integration of community voice limit the story of SNAP-Ed impact that the proposed e-system can tell.
- The proposed e-system presents a narrow scope of PSE work that does not reflect the realities of the programming occurring, brushing over the multi-level work being done with communities to make lasting changes that support healthy behaviors. This exacerbates compartmentalized storytelling and highlights only a part of the SNAP-Ed story.
- The proposed e-system incentivizes silos and discourages collaboration by adding compartmented responsibilities, such as with the needs assessment.
- The SIAs in Michigan operate with different, but complementary models. This is only one example of how states use different implementation models but underscores the necessity of including flexibility in any e-system, so each type of SIA can share their outcomes as well as have those outcomes roll up to tell a national story.

Without additional piloting of the proposed e-system to inform its build out, there will likely be unintended negative consequences. We cannot know the answer to this question or any of the agency's (USDA) questions at this point in the timeline.

For the charge of the 2018 Farm Bill to the agency to be truly realized, it is important that any e-system go through sound piloting. The current proposal is a nascent demonstration of the 2018 Farm Bill mandate. MFF has always welcomed and appreciated efforts to evolve the SNAP-Ed program with colleagues at the state, regional, and federal level. Of key importance is to recognize that the currently proposed nascent e-system will not reach the potential of a properly developed system in time to inform the next Farm Bill. Considering where we are in the timeline of the 2018 mandate, we

recommend an extended demonstration or pilot initiative of an additional 3-5 years to further engage expert stakeholders to tell the story of this uniquely impactful program.

SNAP-Ed works and continues to build on its tremendous potential to empower change. We encourage the agency to soundly consider the feedback of experts in the field as well as the aggregate expert feedback from ASNNA. Launching a pilot of this size and complexity meets the mandate of the 2018 Farm Bill. A sound system developed and tested in partnership is far better than a premature system based on expediency. We commit to stand up and help address the issues thoughtfully identified.

Respectfully submitted,

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Marci K. Scott, PhD, RDN, Vice President of Programs
Sean Harwood, Vice President of Finance
Sarah L. Panken, MS, Senior Director of Community Impact
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Enclosure: *Michigan Fitness Foundation Summative Comments to the Federal Register Response Categories*

Michigan Fitness Foundation
Summative Comments to the *Federal Register* Response Categories
Proposed e-System N-PEARS

This table accompanies Michigan Fitness Foundation’s letter including high-level comments to the *Federal Register* response categories. For reference: the four response categories included in the *Federal Register* are below.

- (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**;
- (b) The accuracy of the agency's **estimate of the burden** of the proposed collection of information (streamline, reduce hours now spent on narrative and EARS), including the validity of the methodology and assumptions that were used (*SNAP-Ed N-PEARS_BurdenTbl* in the Federal Register);
- (c) Ways to **enhance the quality, utility, and clarity of the information to be collected**; and
- (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.

Section	Issue identified	Response category	Strategy to work toward solution
Target Audience & Needs Assessment (Plan)	The focus on quantitative data overlooks qualitative data/information, including community engagement and voice that exemplifies more comprehensive and locally relevant needs.	(c) What are ways to enhance quality, utility, and clarity of information?	Include mechanisms to integrate qualitative data that reflect community voice and needs. Allow SIAs to indicate how they included participant voice.

	There is a misalignment between conducting a global needs assessment when expectation is to report against specific indicators.	(a) Is the information collected necessary and has practical utility?	Needs assessment should set the stage for planning and implementing programming that aligns with required outcomes (i.e., SNAP-Ed Evaluation Framework indicators). Reduce what required in the needs assessment to only what is needed at the federal level.
	SAs need to work with SIAs to collect data/information, but currently SIAs do not have direct access to input data or to see the complete needs assessment.	(c) What are ways to enhance quality, utility, and clarity of information?	Democratize access and ability to input information and view the needs assessment to facilitate collaboration between the SA and IA in planning programming that will meet state and local needs.
	There is a lack of auto-populate features that would streamline data entry into the system, resulting in a lot of manual data entry and the inability to fill auto-populate information from the previous needs assessment, if still accurate.	(d) What are ways to minimize burden?	Streamline collection of secondary data at the national level, include the ability to link, upload, and/or auto-populate data to minimize burden of data collection and synthesizing.
	How state interpret “little programming” (P1.3) will vary.	(c) What are ways to enhance quality, utility, and clarity of information?	Ensure that a professional editor reviews and edits all definitions for clarity.

	Page 1-1. The definition of needs assessment “to identify target audiences and understand their needs” is too vague to be able to address in a meaningful way.	(c) What are ways to enhance quality, utility, and clarity of information?	Add sub-headings that identify data or information that need to be included.
	Table P1.1. Focuses on “obesity” but SNAP-Ed programming focuses on healthy eating and physical activity. Obesity is assessed by BMI or weight for height. While allowable in the SNAP-Ed Guidance, many states do not collect those data, therefore cannot provide data about “obesity”.	(a) Is the information collected necessary and has practical utility?	Focus information included in the needs assessment to emphasize food and physical activity needs.
	Table P1.1. Credible health assessments are done by organizations other than hospitals.	(c) What are ways to enhance quality, utility, and clarity of information?	Remove “Hospital” from “Community Health Assessment” in seventh bullet to allow for inclusion of health assessments done by other credible organizations.
	P1.1. Currently, there is no ability to include results from needs assessments done by Local Implementing Agencies with a community and/or sub-group of their participants.	(c) What are ways to enhance quality, utility, and clarity of information?	Ensure there are mechanisms to include results from local implementing agency needs assessments.

	There is a mismatch between instructions. For example, the instructions for Table P1.1. relate to “related health conditions”, but the table title is “related health outcomes”.	(c) What are ways to enhance quality, utility, and clarity of information?	Ensure that a professional editor reviews and edits all instructions for clarity.
	Page 1-6 Open-ended questions have a 250 or 500-word limit. This may be insufficient space to fully answer the questions asked.	(c) What are ways to enhance quality, utility, and clarity of information?	Ensure that the word limit is appropriate given the magnitude of questions asked.
Executive Summary (Report)	The key successes are reported by goal and SMART objective across projects. For states with numerous projects, there will be high burden to first synthesize those key successes across, in some cases, upwards of 75+ projects and then succinctly present the key success in 100 or fewer words.	(d) What are ways to minimize burden?	Re-define “project” in a way that is meaningful to report outcomes and allows for a more comprehensive story of SNAP-Ed impact.
	The executive summary could serve as an ‘at a glance’ of a state’s SNAP-Ed work and outcomes to share the story of SNAP-Ed’s impact with the public and decision-makers. The current structure, however, removes the opportunity to present and share a more comprehensive story of SNAP-Ed impact because it compartmentalizes the information included.	(c) What are ways to enhance quality, utility, and clarity of information?	Re-do the executive summary to be a public dashboard that highlights both the quantitative and qualitative aspects of SNAP-Ed impact.

	The narrow scope of what is presented, and in turn what can be shared, in the executive summary is exacerbated by including key success of the SA only, bypassing the successes of Implementing Agencies delivering programming.	(c) What are ways to enhance quality, utility, and clarity of information?	Include the ability for states to choose different key results/findings that lift up their unique SNAP-Ed impact story.
	To increase the quality, utility, and clarity of the information being collected, it is essential to align instruction language throughout the section. For example, there is a mismatch between the instructions and the asterisked statement at the bottom of the executive summary section.	(c) What are ways to enhance quality, utility, and clarity of information?	Ensure that a professional editor reviews and edits all instructions for clarity.
SNAP-Ed Action Plan, Planned Projects, and Info about Projects (Plan)	Only SA completes the SNAP-Ed Action Plan. One response per state. (2-1)	(d) What are ways to minimize burden?	Including mechanisms for states to simultaneously work with multiple IAs to develop the action plan.
	The definitions of project and non-project are confusing and possibly open to interpretation. (2-2)	(c) What are ways to enhance quality, utility, and clarity of information?	SIAs participate in a collective process to suggest ways to clarify definitions that reflect the realities of program implementation; ensure that a professional editor reviews and edits all definitions and instructions for clarity.

	Administrative burden of entering each project separately will be significant for states with multiple LIAs implementing multiple interventions. It is not clear that it will result in more aggregable data. (2-2)	(a) Is the information collected necessary and has practical utility?	Prioritize collecting key information essential for fiscal integrity and reporting on high level outcomes and results.
	SNAP-Ed Outreach is done by at all levels and can vary significantly by project, focus audience, etc. To present all state-wide efforts in 250 words or fewer will remove community context and be a significant burden for SAs. (2-3, 3-6)	(c) What are ways to enhance quality, utility, and clarity of information?	Include a mechanism for states with multiple IAs to populate outreach and increase the word limit.
	The description of PSE initiatives is limited and does not reflect the reality of program implementation. (3-2)	(c) What are ways to enhance quality, utility, and clarity of information?	Include a place for process-focused PSE strategies that represent preliminary work that sets the stage for successful PSE change efforts by developing a deeper understanding of community needs and building necessary trust to ensure meaningful and impactful efforts.
	Projects are required to enter PSE efforts as aligned with a specific toolkit intervention to represent PSE efforts made as a part of SNAP-Ed programming. This does not account for when PSE work is a process guided by best-practice approaches. (3-9)	(c) What are ways to enhance quality, utility, and clarity of information?	Add flexibility to how PSE work is represented. Include narrative space that will allow IAs to demonstrate when they use processes guided by best-practice approaches.
	Language question needs clarity. (3-5)	(c) What are ways to enhance quality, utility, and clarity of information?	Add instructions to clarify what it means to offer direct education in a language (e.g., translated classroom

			instruction, indirect channels, promotional materials, etc.).
	Interventions listed in the Toolkit are not yet diverse enough to address all of the audiences and communities served through SNAP-Ed. Further, Toolkit strategies on PSE are minimal.	(c) What are ways to enhance quality, utility, and clarity of information?	Include space to lift up emerging interventions and strategies that integrate and reflect cultural relevance and community context.
	Data entry duplication of intervention 'level of evidence' for planned projects (3-10) that use the same 'other previously developed' interventions.	(d) What are ways to minimize burden?	Include mechanisms so that an intervention being used only needs to be entered once and then will be auto-populated with each additional needed entry.
Project Results (Report)	Duplication of entry for systems-level changes affecting multiple sites (4-3).	(d) What are ways to minimize burden?	Do not require site-level data entry for reporting.
	The project results for indicators require a pre-test/post-test design for reporting.	(c) What are ways to enhance quality, utility, and clarity of information?	Include all forms and types of quantitative and qualitative methods for measuring outcomes. This should also allow for validated retrospective post-test reporting.

Coordination & Collaboration (Plan & Report)	There is a focus on coordination and collaboration at the state level and with other federal programs, ignoring the rich collaboration happening at the local level to advance SNAP-Ed goals.	(c) What are ways to enhance quality, utility, and clarity of information?	Re-think how collaboration is included at all levels to reflect the variety of on-the-ground implementation models.
	There is no evidence that having at least five different sectors involved in a collaborative effort is more effective and/or accomplishes more (meaningful) PSE changes.	(a) Is the information collected necessary and has practical utility?	Remove the five-sector requirement to be able to include collaborative efforts.
Evaluation (Plan & Report)	It is not clear what constitutes a “planned evaluation” (e.g., is it a survey, data collection plan, etc.). All forms and types of evaluation must be included.	(c) What are ways to enhance quality, utility, and clarity of information?	Add clarifying language for “planned evaluations” and define “planned evaluation” (e.g., a process or tool).
	Check boxes limit ability to share details that show a state’s unique SNAP-Ed impact.	(a) Is the information collected necessary and has practical utility?	Change check boxes to open text or add an option to add comments in addition to check boxes to capture more comprehensive data that can be used to tell the SNAP-Ed story.
	FY 2023 Guidance notes that an evaluation plan is not required for project monitoring, which includes collection of MT1-MT3 (FNS-identified priority indicators), because it is included in plan section 4.	(c) What are ways to enhance quality, utility, and clarity of information?	More clarity is needed on the evaluation reports section and what is supposed to be reported.

	This section limits equity by emphasizing “categories” that people check.	(c) What are ways to enhance quality, utility, and clarity of information?	Information can be provided using many different methods, including qualitative (formative, process, outcome, or impact evaluation).
	It is unlikely thousands of rows of data will be useful for FNS, and it is very burdensome for states.	(a) Is the information collected necessary and has practical utility?	Prioritize collecting and reporting on key information essential for fiscal integrity and high-level outcomes and results; create tables for summary data.
	First sentence is confusing, all evaluations should have a related evaluation plan. By “evaluation” do you mean the assessment tools or the process of assessment (e.g., when you ask for title of the evaluation are you asking for the name of the survey)?	(c) What are ways to enhance quality, utility, and clarity of information?	This needs to be thought through more deeply. It is not currently actionable.
	The evaluation section focuses on quantitative data at the expense of qualitative data that could lift up community voice and help tell a more comprehensive story of SNAP-Ed work.	(c) What are ways to enhance quality, utility, and clarity of information?	Add “guided interview” and other qualitative evaluation methods to the list of data collection methods (Table P4.1.). Change measurements to measures or data collection tools.
	Dissemination reporting is focused on higher-level publications (peer-reviewed reviewed journals) and less so on sharing results back to the communities or creation of public dashboards.	(c) What are ways to enhance quality, utility, and clarity of information?	Include components that lift up feedback loops with the communities served through SNAP-Ed and the public. The grey literature and digital communication must be considered.

Budget and Staffing (Plan & Report)	The interpretation of “Project” is critical to confirm the parameters of budget and staffing planning.	(d) What are ways to minimize burden?	Suggest retaining as current – at the Organization level.
	Representation of costs in Table P6.2d. may be skewed for an organization that has multiple subrecipients as “projects”.	(c) What are ways to enhance quality, utility, and clarity of information?	Keep subrecipients as a line item in (a State/IA’s) budget rather than teased out as separate “projects.” Individual subrecipient budgets can be included as attachments to provide additional context for the subrecipient budget line item instead.
	Reporting on “other sources of funding” at the beginning of the year is counter-intuitive and can present inaccurate information as many additional sources of funding may not be known, or may not be sought out, until the program is under implementation.	(c) What are ways to enhance quality, utility, and clarity of information?	Keep reporting of “other sources of funding” for the annual report.