

Appendix I11. Public Comment #6

PUBLIC SUBMISSION

As of: August 15, 2022
Received: August 09, 2022
Status: Posted
Posted: August 09, 2022
Category: Public Policy Org.-State
Tracking No. l6m-ap8r-9qu2
Comments Due: August 09, 2022
Submission Type: API

Docket: FNS-2022-0017

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

Comment On: FNS-2022-0017-0001

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

Document: FNS-2022-0017-0057

Comment on FR Doc # 2022-12504

Submitter Information

Email: anthony.zech@dhs.wisconsin.gov

Government Agency Type: State

Government Agency: Wisconsin SNAP-Ed, Department of Health Services

General Comment

The Wisconsin Department of Health Services SNAP-Ed program supports the below listed recommended changes (and attached complete list with addition details) to the National PEARS planning system and implementation timeline. Most of these recommendations were developed by FoodWIse, the largest SNAP-Ed implementing agency in Wisconsin that manages 32 distinct county level programs. Among all the implementing agencies in Wisconsin, FoodWIse has the most robust capacity to meet the proposed National PEARS timeline and use requirements and has none-the-less identified the below significant burdensome processes and timeline constraints. It is therefore notable that the other 5 implementing agencies in Wisconsin will also face similar or greater burdens. On behalf of all 6 Wisconsin SNAP-Ed implementing agencies, it is our recommendation that the below and attached comments and suggestions be strongly considered with special consideration for delaying for the comprehensive N-PEARS use until FY24 as listed in the first section of the comments.

Overarching/cross-cutting:

- Many of the elements of the N-PEARS reporting system seem to flow directly from the set-up in the annual plan. Requiring the entry of the FY23 report before a corresponding annual plan is entered into the system will lead to significant reporting and administrative burden. There is not enough time to make all changes required to data collection and reporting systems by October 2022 to effectively report in this system for FY23. The resulting impact will be incomplete program evaluation and reporting data for FY23. We suggest requiring use of the N-PEARS system comprehensively starting in FY24, when it will be possible to establish the annual plan with the necessary information and format and then report against this plan.

- The extent to which program evaluation data entered throughout the year into PEARS will or will not pre-populate into the reporting form is unclear. If pre-population is not possible, manual entry will be a significant burden on state IA and IA staff.
- The estimated time burden for IAs seems to be a marked underestimate. All of our IAs and state staff would need significantly more time to input all of the additional information.

State Plan

- Section 1: Needs Assessment:
 - Restricting access to the planning portal for IAs until completion of the needs assessment and action plan by the SA has a strong potential to create bottlenecks and restricted time for IAs to complete their portions of the state plan.
 - The needs assessment module requires significant manual entry. Suggest allowing for upload of tables, documents, etc. Word limits in text boxes provide very limited opportunities to include details about local context, resulting in a very high level needs assessment that may not capture important local contextual information/data that is relevant for planning.
- Section 3: Planned projects
 - The term “project” is being interpreted differently by different IAs. Clarity is required on this term given it is the basis for much of the organization of the plan.
- Section 5: Coordination and collaboration:
 - Suggest reconsidering definition of coalition as 5 or more sectors. This definition limits reporting on groups that are functioning effectively as coalitions but may have less than 5+ sectors represented. As an example, over the past three years, only 63 of 202 groups that we reported as coalitions had 5+ sectors represented, though they were effectively functioning as coalitions. This comment is particularly relevant for rural coalitions.
 - Manual entry of coalitions will be very time intensive. Suggest including option to upload tables.
- Section 6: Planned staffing and budget:
 - Given the lack of standardization of projects across states and across IAs, the utility of planning and reporting budgets by project is not clear since information will not be able to be rolled up and compared at the national level. Recommend that the budget should be planned by IA and not by project.
 - Travel: It is not realistic to manually enter each in-state trip. For example, a statewide program with 32 county projects would need to create detailed budgets with travel for each site visit/activity. This would result in over a thousand rows of entries. Suggest allowing upload of tables.

Report

- Section 3: SNAP-Ed Financial Reporting:
 - Suggest reporting expenses by IA, and not by project.
- Section 4: Project Results:
 - The guidance lacks clarity about which SNAP-Ed sub indicators we need to evaluate.
 - The requirement to report by site seems unduly burdensome
 - The module currently only asks to report on partners for PSE rather than a more comprehensive picture of partners we work with across our programming.
 - The PSE module of Section 4 of the report does not ask for reporting on PSE efforts in planning, assessment or evaluation stages.

Attachments

Wisconsin Department of Health Services SNAP-Ed Program Comments

The Department of Health Services SNAP-Ed program supports the below listed recommended changes to the National PEARS planning system and implementation timeline. These recommendations were developed by FoodWIse, the largest SNAP-Ed implementing agency in Wisconsin that manages 32 distinct county level programs. Among all the implementing agencies in Wisconsin, FoodWIse has the most robust capacity to meet the proposed National PEARS timeline and use requirements and has none-the-less identified the below significant burdensome processes and timeline constraints. It is therefore notable that the other 5 implementing agencies in Wisconsin will also face similar or greater burdens. On behalf of all 6 Wisconsin SNAP-Ed implementing agencies, it is our recommendation that the below comments and suggestions be strongly considered with special consideration for delaying for the comprehensive N-PEARS use until FY24 as listed in the first section of the comments.

Overarching/cross-cutting:

- Many of the elements of the N-PEARS reporting system seem to flow directly from the set-up in the annual plan. Requiring the entry of the FY23 report before a corresponding annual plan is entered into the system will lead to significant reporting and administrative burden. There is not enough time to make all changes required to data collection and reporting systems by October 2022 to effectively report in this system for FY23. The resulting impact will be incomplete program evaluation and reporting data for FY23. We suggest requiring use of the N-PEARS system comprehensively starting in FY24, when it will be possible to establish the annual plan with the necessary information and format and then report against this plan.
- The extent to which program evaluation data entered throughout the year into PEARS will or will not pre-populate into the reporting form is unclear. If pre-population is not possible, manual entry will be a significant burden on state-level IA staff.
- The estimated time burden for IAs seems to be a marked underestimate. Our implementing agency coordinates the planning process with 32 county projects. The manual entry requirements would be a significant time investment for a statewide program. For example, our implementing agency, a statewide program, estimates the total burden to be approximately 40 hours per county project x 32 county projects + 40 hours per implementing agency administrative review = 1,320 hours.

State Plan

- Section 1: Needs Assessment:
 - Restricting access to the planning portal for IAs until completion of the needs assessment and action plan by the SA has a strong potential to create bottlenecks and restricted time for IAs to complete their portions of the state plan.
 - The needs assessment module requires significant manual entry. Suggest allowing for upload of tables, documents, etc. Word limits in text boxes provide

very limited opportunities to include details about local context, resulting in a very high level needs assessment that may not capture important local contextual information/data that is relevant for planning.

- Section 3: Planned projects
 - The term “project” is being interpreted differently by different IAs. Clarity is required on this term given it is the basis for much of the organization of the plan.
 - Our IA uses many different curricula, many of which are not part of the SNAP-Ed Toolkit. It will be time intensive to enter this data under the Evidence Base section. We recommend that details for each curriculum and its evidence-base be entered only once, rather than for each project since there are curricula that may be used across different projects.
- Section 5: Coordination and collaboration:
 - Suggest reconsidering definition of coalition as 5 or more sectors. This definition limits reporting on groups that are functioning effectively as coalitions but may have less than 5+ sectors represented. As an example, over the past three years, only 63 of 202 groups that we reported as coalitions had 5+ sectors represented, though they were effectively functioning as coalitions. This comment is particularly relevant for rural coalitions.
 - Manual entry of coalitions will be very time intensive. Suggest including option to upload tables.
- Section 6: Planned staffing and budget:
 - Given the lack of standardization of projects across states and across IAs, the utility of planning and reporting budgets by project is not clear since information will not be able to be rolled up and compared at the national level. Recommend that the budget should be planned by IA and not by project.
 - Travel: It is not realistic to manually enter each in-state trip. For example, we have a statewide program with 32 county projects that create detailed budgets with travel for each site visit/activity. This would result in over a thousand rows of entries. Suggest allowing upload of tables.

Report

- Section 3: SNAP-Ed Financial Reporting:
 - Suggest reporting expenses by IA, and not by project. The time burden to track and monitor federal expenditures by project will be significant. For example, our IA has 5 projects that are implemented by 32 county teams (which each have their own local budget). In order to track expenditures by county, SNAP-Ed project, and SNAP-Ed ‘non-project’, our IA would need to create 198 funding strings and class codes. The administrative burden that would be placed on our administrative office to create, manage, and track expenses across 198 funding strings and class codes is significant and not reflected in burden estimates. Furthermore, staff typically work across multiple projects and it would be unreasonable to capture effort dedicated to multiple projects.
- Section 4: Project Results:

- The guidance lacks clarity about which SNAP-Ed sub indicators we need to evaluate. Specifically, it is unclear whether implementing agencies are required to evaluate all of the sub indicators that are listed in the new reporting forms (pp. 4-8, 4-9, & 4-10) for all age groups. In addition, as was noted during a recent PEARS Advisory Committee meeting, we do not have validated evaluation questions for some indicators for younger age groups (MT1I & MT1m, for example). We recommend flexibility to elect to evaluate a subset of the sub indicators listed on the reporting forms. Also, for sub indicators such as these where it might be challenging to collect reliable data for youth, we request clarification on whether it is acceptable to limit our evaluation to adults.
- The requirement to report by site seems unduly burdensome
- The module currently only asks to report on partners for PSE rather than a more comprehensive picture of partners we work with across our programming. Recommend including reporting on partners for direct education, PSE, and social marketing efforts for a fuller picture of the multi-level work happening within SNAP-Ed programs. Reporting of partners across intervention strategies would more closely align with planning and reporting at a project level.
- The PSE module of Section 4 of the report does not ask for reporting on PSE efforts in planning, assessment or evaluation stages. Only Section 6 of the report provides the opportunity for narrative reporting on PSE, and with this section only focuses on challenges. Due to the longer term nature of PSE approaches, many project efforts will not be captured in the reporting and progress on PSE approaches over time will not be captured.