Appendix I13. Public Comment #7

PUBLIC SUBMISSION

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

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General Comment

This comment comes with three preliminary concerns about the proposed SNAP-Ed e-reporting system. It is based on a cursory review of the documents in the June 10 Federal Register. It is not a detailed analysis but is intended to complement comments that others will submit.

Overall recommendation: Finalization and implementation of the new e-system should be delayed until:
  a robust set of public comments is obtained and analyzed,
  expert stakeholders in the field have been fully engaged in the design and outputs that public comments and other user input generate,
  e-modules for the State Plan (Plan) and Annual Report (Report) are fully tested and finalized,
  example key reports and graphics of aggregated information needed by Congress and by states have been modeled, and
  a formal roll-out plan with training, technical assistance, and peer leadership has been formalized.

These processes are critical for success and will require collaboration between USDA and SNAP-Ed stakeholders over a period of 2 to 3 years.

The specific concerns about the current proposal are elaborated in the attached file. The three concerns are:

1. A 60-day comment period is insufficient for a proposal of this length, newness, and complexity and for an e-system that will be in place for years once approved by OMB.

2. The proposed e-system has not been tested to determine whether it can be implemented successfully and/or if it will meet the needs of the program's 53 SAs and 168 diverse SIAs or requirements of the 2018 Farm Bill.

3. Models, examples, and practical peer experience are needed to help assure stakeholders that the proposed e-system can produce outputs of the type and quality that are required.

From a global perspective, the SNAP-Ed data system can be seen a cornerstone that also supports other nutrition assistance programs. By considering user recommendations, putting in place processes that capture the input of expert practitioners, testing the concepts and reporting for their functional utility, and designing it to anticipate ongoing program growth and policy changes, there is the opportunity to put in place a new, state-of-the-science data system. Such a system will benefit not only SNAP-Ed but also help capture the achievement of many other objectives that are mission-critical to USDA.

Attachments

Federal Register Comments SBF 7-28-2022

This comment comes with three preliminary concerns about the proposed SNAP-Ed e-reporting system. It is based on a cursory review of the documents in the June 10 Federal Register. It is not a detailed analysis but is intended to complement comments that others will submit.

Perspective: Development of an e-reporting system for SNAP-Ed is novel and important, so it is critical that it yields the outcome information that statutes require and that federal, state, and other stakeholders want to know. As the country's largest, most flexible, diverse, and responsive federal community nutrition program designed to support low-resource communities with sustained nutrition education and promotion activities, SNAP-Ed is central to achieving the country's new food and nutrition security goals. Therefore, the new e-system must be designed flexibly enough to provide continuity over the years while also adapting as the program responds to changing U.S. needs. The strengths of SNAP-Ed – its comprehensive approach, the large number and diversity of grantees, its work with community partners, the rich variety of direct services and leadership activities it provides, the multi-level performance objectives from which participating agencies can choose, and its innovation – make designing an e-reporting system both stimulating and challenging. There is no known e-system after which one for SNAP-Ed could be modeled.

Context: This new e-system should fulfill four new requirements in the 2018 Farm Bill:
- States must produce annual reports that describe and present an analysis and outcomes of each 'project' it conducts that will be made publicly available by the Secretary.
- The USDA Food and Nutrition Service (FNS) must submit an annual report to Congress that discusses the level of coordination among nutrition education programs.
- States must describe how they will use an electronic reporting system to measure and evaluate their SNAP-Ed 'projects'.
- States must describe how they will use an electronic reporting system to account for allowable administrative costs in eight specific categories.

These mandates were unfunded until mid-2021, and new federal staff were not available to guide the work. The proposed e-system was produced under the pressure of time and not seen or vetted by its user community prior to June 10. For such a novel, far-reaching, and important system to be done right, more time is needed, and processes must be in place to fully engage the expert partner agencies that are expected to implement the new system. Otherwise, there is high risk of failure relative to both producing results and to respecting administrative burden across the full spectrum of the program, from states to implementing agencies to participants.

Overall recommendation: Finalization and implementation of the new e-system should be delayed until:
- *a robust set of public comments is obtained and analyzed,*
- *expert stakeholders in the field have been fully engaged in the design and outputs that public comments and other user input generate,*
- *e-modules for the State Plan (Plan) and Annual Report (Report) are fully tested and finalized,*

- *example key reports and graphics of aggregated information needed by Congress and by states have been modeled, and*
- *a formal roll-out plan with training, technical assistance, and peer leadership has been formalized.*

These processes are critical for success and will require collaboration between USDA and SNAP-Ed stakeholders over a period of 2 to 3 years.

These are specific concerns about the current proposal:

1. A 60-day comment period is insufficient for a proposal of this length, newness, and complexity and for an e-system that will be in place for years once approved by OMB. If done poorly, an unmanageable reporting system will not provide needed information and will divert significant resources away from service into administration. Much of the content proposed for e-plans and e-reports is reformatted or entirely new, so the nearly 400-page package is very difficult for potential users to understand. Templates of newly required information were presented for the first time in the 2023 Guidance that was released on May 11, 2022, only 30 days before the proposed e-system was announced in the Federal Register, and therefore users had to time to review, much less try out, the new modules. The proposed e-forms are very information-dense, and the screen shots of proposed data entry formats are visually fuzzy and in spots cannot be read at all. Instructions are sparse and definitions are incomplete or inconsistent, so it's not possible for users to understand how to navigate between the Plan and Report. Since neither the Plan nor its companion Report have been pilot tested, it is not known whether the hundreds of data entries that are intended to integrate and auto-populate between the time periods will do so, or to anticipate what complications or even 'crashes' that might occur with use.

To improve and further evolve planning a new e-system, public comments are needed from a high proportion of the 53 SNAP State Agencies (SA) and 168 State Implementing Agencies (SIA). There should be geographic representation from all regions of the country; from states with different administrative models, including those with sub-grantees/local implementing agencies; and from all institutional types of SIA: university cooperative extensions, other universities, state health departments, other state departments, non-profits, Tribal-serving organizations, and local governments. Agencies that are expected to implement and use the proposed e-system need time to thoughtfully review and comment on this massive proposal. In addition, most SAs and many SIAs have internal clearance processes for Federal Register comments so, even if staff could review the proposal and prepare comments, the 60-day period is insufficient to also obtain approval to submit them. This 60-day period allows for fewer and less robust responses than are needed for such an important new administrative activity, especially disadvantaging SIAs that have leaner administrative infrastructures or are newer to SNAP-Ed.

Last, the timing which requires comments to be prepared during the June-August period is extremely difficult for states. After waiting since the fall of 2021 for this e-package to be

released, it comes during the heaviest administrative period in the SNAP-Ed year. SIAs have a hard deadline to get their plans to SAs by July 15, and SAs in turn must review, compile, and finalize the plans to submit to the FNS Regional Offices by August 15. Neither SIAs nor SAs can divert personnel from the essential task of qualifying their state for the coming year's SNAP-Ed grant to review the proposed e-system instead.

For these reasons, a low response during the public comment period is likely. It reflects workload realities and does not indicate either disinterest in, or support for, the proposed e-system.

2. The proposed e-system has not been tested to determine whether it can be implemented successfully and/or if it will meet the needs of the program's 53 SAs and 168 diverse SIAs or requirements of the 2018 Farm Bill. The design period of the proposed e-system is rushed and not inclusive enough. The 'rule of 9' seems to have limited participation in formal development processes. Less formal input was obtained but only through highly structured, limited-participation work groups facilitated by a contractor with limited SNAP-Ed expertise. The rationale for decisions about which work group recommendations to adopt or reject was not shared. Decisions were not vetted with a broader set of expert stakeholders prior to publication in the Federal Register.

Next, it is problematic that the proposed N-PEARS system is based on PEARS, which was designed primarily to help states complete their USDA EARS reports. Over its 10+ years of operation, and even as the scope and statutory activities of SNAP-Ed changed, it was not possible to update EARS so that it could provide summary information about nationwide participation, results, or outcomes. Even though states submit hundreds of evaluation reports each year, EARS and narrative reporting did not provide a national system capable of producing nationwide estimates of how many millions of people are reached by the four components of the program or the tens of thousands of community locations in which various types of SNAP-Ed activities are occurring. The results of the four components – direct education; social marketing campaigns; policy, systems, and environmental change initiatives; and multi-sector collaborations – are not captured in either EARS or PEARS. Further, while PEARS provides its users with information to help manage their programs, N-PEARS does not appear to return any information or provide added value back to states. What information generated by the e-system would be made publicly available by the Secretary for each state is not specified. From the information provided in the Federal Register, it is not clear that the proposed e-system will fill any of these voids, and there appears to be no accountability to the public or to expert stakeholders.

The e-system appears to require that a massive amount of new information be reported in the Plan and the Report. Why the information is needed or how it would be used to improve the program is not described. The workload burden published in the Federal Register appears to be a gross under-estimate. It was based on estimates from only 2 of the 53 states and an unknown number of SIAs from among the 168 who lead SNAP-Ed activities across the nation.

Determining how much time is really needed for reporting and record keeping will require input from many more, and more representative, expert users.

In addition, the new e-system seems to require an unnecessary shift in roles between SAs and SIAs. SNAP funds SNAP-Ed to offer a discrete set of high-quality nutrition education and promotion functions. It does so by funding diverse specialty organizations such as universities, non-profits, sister state agencies, tribal bodies, and other entities that have the position, partnerships, reach, and know-how to plan, run, and evaluate nutrition education and promotion activities in low-resource communities. The new e-system would newly require SAs to complete most of the Plan and essentially delegate implementation and evaluation to SIAs. Planning, implementation, and evaluation are continuous, integrated activities that cannot be separated. There is no rationale given for this shift in responsibility or evidence that the change in roles would improve the program.   The SNAP-Ed program guidance puts a high priority on collaboration but then disarticulates these essential program planning and implementation components in this new system.

Last, implementation of the proposed N-PEARS templates is premature, and the sequence is backwards. It is proposed that states use the Plan and Report modules in the Federal Register even though neither has been finalized or tested. In addition, and the Federal Register forms are likely to change based on public comments. This is a problem because data for annual reports are collected continuously from the start of each fiscal year, so states need to know in less than three months – on October 1, 2022 – what data they and all their local partners must collect by year's end on September 30, 2023. After that, states are asked to complete their 2023 Report without having a 2023 Plan to draw from. The intent of the e-system is for the data in the Plan to subsequently auto-populate the Report and for those two sets of data to show change over the year. Without having first prepared a Plan, states will have to complete their 2023 year-end report by back-estimating what would have been in a 2023 Plan. Therefore, it will not be known if the data transfer smoothly between the two documents, or if the pre-post numbers truly capture change in reach, locations, outcomes, and results. This order of operations essentially requires that the 2023 year of data be disregarded.

3. Models, examples, and practical peer experience are needed to help assure stakeholders that the proposed e-system can produce outputs of the type and quality that are required.
Development of most program data systems starts with the end in mind. Stakeholders determine key questions the system needs to answer. Once there is agreement on the most important information, planners mock-up dummy tables, graphics, and sample reports to assure that the data being requested are the right ones, that each data point has a purpose, and that aggregation, statistical analyses, and other practical forms of analysis and interpretation are available. Successful also data systems return useful information to all who contribute to them– local agencies, unfunded partners, state, and local opinion leaders, media, and the public – because the quality of information improves when people use it themselves, doing so engages stakeholders in the program's mission, and having responsive information builds support for the program's activities. There is no indication that such processes are planned for the proposed e-system.

Finally, the SNAP-Ed Evaluation Framework and its companion Interpretive Guide (2017) (https://snaped.fns.usda.gov/program-administration/snap-ed-evaluation-framework) were designed by SIAs and FNS specifically to address concerns of OMB (2008), operationalize the broader scope of SNAP-Ed activity called for in the 2010 Healthy, Hunger Free Kids Act, and help states themselves capture the variety of results and outcomes that SNAP-Ed programs across the country were achieving. Since 2017, SIAs have continued to assess uptake of the Framework and how it is used. The Association of SNAP Nutrition Education Administrators (ASNNA) has published papers on the Framework. It has conducted biennial censuses, sponsored multiple dedicated expert working groups, and offered peer-led trainings. Work to update the Framework in line with user experience, new science and metrics, and policy priorities is ongoing. ASNNA also studied the requirements of the 2018 Farm Bill and produced a position paper entitled, Recommendations for Implementing the Nutrition Education and Obesity Prevention Program (SNAP-Ed) Provisions in the 2018 Farm Bill, which focuses heavily on the state plan, the federal report, and the new e-reporting provisions (https://asnna.us.org/evaluation-committee/).

It is not evident that these resources or recommendations were incorporated in the proposed e-system. Doing so would reflect know-how acquired over the last decade, help develop consensus among stakeholders, and accelerate many steps in the development process of a successful e-reporting system.

From a more global perspective, to achieve food and nutrition security in the United States by 2030, updated data systems and infrastructure are needed at USDA. The SNAP-Ed data system can be seen a cornerstone that supports other nutrition assistance programs. By considering ASNNA recommendations for a modern SNAP-Ed reporting system, putting in place processes that capture the input of expert practitioners, testing the concepts and reporting for their functional utility, and designing it to anticipate ongoing program growth and policy changes, there is the opportunity to put in place a new, state-of-the-science data system. Such a system will benefit not only SNAP-Ed but also help capture the achievement of many other objectives that are mission-critical to USDA.