

Appendix I17. Public Comment #9

PUBLIC SUBMISSION

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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-2022-0017-0082

Comment on FR Doc # 2022-12504

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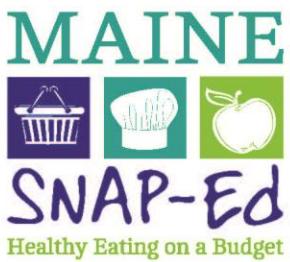
Organization: University of New England

General Comment

See attached file(s)

Attachments

Maine SNAP-Ed Comment to USDA FNS_08.09.2022



To: Food and Nutrition Service (FNS), USDA
From: University of New England, Implementing Agency for SNAP-Ed in Maine
Date: August 9, 2022
Re: [Docket No. FNS-2022-0017] in response to FNS, USDA seeking comments on 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)

On behalf of Maine SNAP-Ed, the University of New England (UNE) as the Implementing Agency (IA) for SNAP-Ed in Maine respectfully submits the following comments specific to Docket No. FNS-2022-0017. In your notice from June 10, 2022 we have focused on (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, including the validity of the methodology and assumptions that were used; (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.

We applaud FNS' effort to create a more streamlined plan submission and consistent reporting process to allow data to be aggregated and shared to demonstrate SNAP-Ed success. Upon review of the proposed system for collection of information, the University of New England as the IA in Maine has recommendations for how to ease the burden of information collection and better facilitate the use of technology for Implementing Agencies (IAs) and State Agencies (SAs).

Timing of Plan and Annual Report Submissions

Maine SNAP-Ed submitted a two-year plan for FY 2022 and FY 2023 and as such is submitting revisions for FY 2023 in the current Plan format. Due to this Maine SNAP-Ed will be entering the FY 2023 Annual Report before submitting a Plan in the new system which will require too much manual entry and be time consuming for a program with finite capacity. In order to minimize the burden of collection of information, we recommend waiting until FY 2024 before requiring all states to enter their Annual Reports which will be after all states have submitted a Plan using the new system. In addition to this, the systems will need mechanisms to streamline data entry (e.g., allow import of data tables), allow multiple users to input information, and reduce data entry that is duplicative to other sources.

Reporting and Budget by Project

While reporting by project seems to emphasize multi-level programming, the data being collected/reported are not conducive to telling the comprehensive story of SNAP-Ed programming. This is exacerbated because the definition of the term "project" is significantly changed from how Maine SNAP-Ed uses it in FY 2022 and FY 2023, and seems open to interpretation. Reporting project-by-project and site-based adds an administrative burden especially since it is not clear how these data will be used and what utility there is in collecting these data. UNE, as the IA for SNAP-Ed in Maine does multilevel, comprehensive interventions, and this will not be accounted for with the project site entry approach.

The definition of non-project is also confusing as it segregates a set of activities that then do not relate to the needs assessment, goals, etc. There seems to be a disconnect between the needs assessment, action plan and SMART objectives because the needs assessment should inform the action plan and then subsequently the SMART objectives to achieve the action plan, not listing SMART objectives by project.

As the one IA in Maine, clarity is needed about what is to be included in the Action Plan. In addition, not having a mechanism for UNE staff at the IA to populate the action plan process will result in additional burden for the State Agency. The additional administrative burden of reporting all projects for a state is crucial especially because the flexibility in interpretation of the term project and the variety of inputs do not seem like it will actually result in data that can be aggregated and thus useful to FNS.

We recommend that budget should be by agency and not by project since agencies work on multiple projects. Budgeting by project adds an undue administrative burden. We also recommend that the budget report ask about leveraged resources and not reporting additional funds received. There is an administrative burden with having to report these other sources of funding, especially with how the other funding will be spent. The point is to highlight leveraging other sources of funds/resources, but the approach in the form is overly burdensome. From an information technology perspective, the budget will need to be downloaded/exported for review, approval and tracking purposes throughout the year and cannot only be available in N-PEARS. Budgeting would be streamlined by the ability to upload spreadsheets, etc.

Target Audience and Needs Assessment (Plan)

As proposed, significant new workload and skill levels would be required, especially for SAs, to pull a high volume of new data from over 50 secondary data sources for topics which may have minimal relevance to SNAP-Ed state projects. Some key census and health data, e.g., for population segments at <185% Federal Poverty Level, require skilled manipulation and should be provided at the national level to reduce burden and minimize program resources being directed away from direct SNAP-Ed programming.

Only SAs – not IAs – are provided access to the Needs Assessment section, but in most states (including Maine), SAs work with IAs to perform needs assessments and collect and compile data as an essential part of planning, goal/objective setting, and evaluation. The proposed Needs Assessment module creates a new workload and skill set for SAs while restricting access for IAs, increasing burden and limiting collaborative planning and programming.

Social Marketing

The social marketing module in the Annual Report is not currently reflective of how states conduct social marketing. Campaign scale, market segments and reach and engagement could be determined in many ways and do not denote campaign success. The social marketing module needs to be flexible enough to incorporate changes in the SNAP-Ed Evaluation Framework, which may be updated to allow for more in-depth reporting on the varied ways that states conduct social marketing.

Thank you for the opportunity to provide comments on the proposed collection of information for SNAP-Ed N-PEARS.

Respectfully submitted,

The Maine SNAP-Ed Implementing Team at the University of New England