

Appendix I19. Public Comment #10

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-2022-0017-0045

Comment on FR Doc # 2022-12504

Submitter Information

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General Comment

From Pennsylvania SNAP-Ed Implementing Agency, see attached files: 1)Comments on SNAP-Ed State Plan and 2)Comments on SNAP-Ed Annual Report.

Attachments

SNAP-Ed Report Form Mockups Comments

SNAP-Ed Plan Form Mockups Comments

SNAP-Ed Report Form & Mockups

Pennsylvania Comments

General Comments:

PA SNAP-Ed Implementing Agency (IA) reiterates the ASNNA team comments on the following general themes regarding the proposed Plan Form. (1) There is not adequate time to review, comment, and synthesize what the changes will mean for the program overall. (2) Reviewing and finalizing prior to more robust testing of the proposed Report form is premature. (3) Proposed Report Form appears to require too much manual entry, which would be very time consuming for very large programs and/or programs with lower capacity. The systems 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. (4) Estimated time burdens are unreasonable. (5) Entering FY23 annual report before submitting a plan in the new system is problematic, better to wait to enter annual report until FY24 after all states have submitted a plan using the new system.

It is not possible for PA SNAP-Ed to complete the Proposed Report Form for FY 2023. There is not sufficient time to update PA SNAP-Ed processes before October 1, 2022, e.g., updating data collection and process evaluation planning templates and resources, working with Partners to customize those templates for their Statements of Work, Partners to train staff on new data collection and reporting elements, STARtracks system updates, etc.

- The following are direct education reporting examples that would require changes to data collection and reporting mechanisms (1) Table R4.3 additional categories for age, additional gender response options, (2) new mode of delivery options: in-person, virtual-live/online, and virtual-interactive multimedia, and (3) languages.
- Table R4.9 (Active Partners ST7 – by Project and for PSE Only) partnership reporting would require changes to data collection and reporting mechanisms, e.g., database change to link elements together and develop new report.

One copy of Section 4 is to be completed for each Project (K-12 Schools, Early Childhood, Food Assistance, Food Retail, Community). Historically, PA reported on Statewide Evaluation of MT1, MT2, and MT3 for Adult/Senior and School-Age. It seems overly burdensome to report **by Project** in Section 4 (Tables R4.4-R4.8) and **by Evaluation** in Section 5 (Table R5.2)? With Project being defined differently by States, the point of collecting this information by Project is not clear. Instead, could some of the indicator and outcome measure information be incorporated into Section 5 by Evaluation? For PA SNAP-Ed, we also question where partner-specific evaluation reporting fits in to both of these Sections.

Section 3 (SNAP-Ed Financial Reporting):

PA SNAP-Ed Implementing Agency (IA) has serious concerns about the feasibility of budgeting (and thus reporting) by “Project”. Many of the categories would overlap Projects (cluster of interventions with common goals, intended outcomes, target audiences, and implementation setting types) and the administrative burden to separate costs by Project for budgeting and reporting would be substantial.

Section 4 (Project Results):

Table R4.2, Project Sites: Complete one row to describe each site in which SNAP-Ed programming was implemented. Table includes fields for: Site Name (suggest allow user to upload a list of sites in common formats), Setting (suggest drop down menu with options from Table P3.1), Intervention Approaches

with PSE breakdown by stage (suggest select all that apply), and Site Address. To demonstrate scope, there are approximately 1,350 program delivery sites that would be reported for FY 2021 PA SNAP-Ed.

Page 4-3: It doesn't appear you can select more than one intervention type/approach for each site. Mockups only show one intervention type per site. This is an example of a disconnect between the proposed Report Form and the Mockups.

One copy of Section 4 is to be completed for each Project. PA SNAP-Ed would need to complete the MT1, MT2, MT3, MT5, MT6, and ST7 tables for each Project (K-12 Schools, Early Childhood, Food Assistance, Food Retail, Community, etc.)

- Does partner-specific outcome measure data for MT1, MT2, and MT3 need to be compiled and entered here by Project?
- Tables R4.7 & R4.8: Is there an option to populate tables in the report from PEARS data, e.g., Estimated Site Reach, Type of PSE Change Adopted/Maintained? Is Description collected in PEARS PSE Reporting module or is this something that is unique to the proposed SNAP-Ed Report Form? This would be a massive amount of data to enter at the state level.

PA SNAP-Ed Partners do not use PEARS for direct education, indirect channel, or partnership data entry. Is the Proposed Report Form going to be more burdensome for PA because we don't use all of the PEARS modules for data entry? Is there an option to import our STARtracks data into the report?

There are a lot more reporting requirements for social marketing than there have been previously, e.g., Table R4.10 - Potential Reach by Market Segment and Table R4.11 - Reach and Impressions by Channel.

Section 5 (Evaluation Reports):

This section seems to ask for duplication of efforts (manually entering data from a finished document). No way to upload Partner evaluation reports.

Table R5.2 and R5.3 appear to be appropriate for reporting statewide evaluation results. Where do partner-specific evaluation project results fit with the context of the annual report?

Are partner presentations and publications still collected? These presentations and publications may be tied to SNAP-Ed work completed in previous fiscal years.

Section 7 (Success Stories)

This section seems to ask for duplication of efforts (manually entering data from a finished document). Is there an option to upload success stories as PDF documents?

SNAP-Ed Plan Form & Mockups

Pennsylvania Comments

General Comments:

PA SNAP-Ed Implementing Agency (IA) reiterates the ASNNA team comments on the following general themes regarding the proposed Plan Form. (1) There is not adequate time to review, comment, and synthesize what the changes will mean for the program overall. (2) Reviewing and finalizing prior to more robust testing of the proposed Plan form is premature. (3) Proposed Plan Form appears to require too much manual entry, which would be very time consuming for very large programs and/or programs with lower capacity. The systems 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. (4) Estimated time burdens are unreasonable. (5) Planned timing of access to N-PEARS for crafting State Plans is unclear. Aligned with release of Annual Guidance? What about necessary N-PEARS changes due to Guidance changes? Limiting Sections 1 and 2 access to State Agencies further compresses the timeline available to Implementing Agencies to enter required Plan data in N-PEARS.

In Pennsylvania, the IA (housed at Penn State University) submits the Plan through various University departments for review before it is finally submitted to the State Agency. University review typically examines the statewide “summary” budget as well as IA and Partner fiscal documents. The Plan, as submitted, currently includes Partner proposal documents for internal (Penn State) and external Partners; however, as noted in previous comments, there is no mechanism to include the Partner proposal documents (e.g., Statement of Work, Budget, Staffing Charts, etc.) in the proposed Plan Form. Upon Plan approval, Penn State issues subawards to external Partners – those subawards include Partner Proposal documents as attachments (e.g., Statement of Work, Budget, Staffing Charts, etc.) that become part of the contractual requirements of the subaward, but in the proposed Plan Form those documents are no longer part of the PA SNAP-Ed Plan. This structure creates a disconnect between the attachments in external partner subawards and the content of the Plan that goes to the State Agency and to FNS for approval.

PA SNAP-Ed IA expects to release the FY 2024 RFP in January 2023. The RFP is designed to collect the necessary information from potential Partners for development of the PA SNAP-Ed Plan. Substantial changes to the Plan Form will be very difficult to adequately process after the RFP has been prepared and released. Some content for the annual Plan is collected from RFP applicants using STARtracks (PA SNAP-Ed's online reporting system); thus, changes to Plan content requirements can have STARtracks development implications, e.g., incorporating identification of “rural” proposed program locations for Table P3.1. To demonstrate scope, there are approximately 2,850 program delivery sites proposed for FY 2023.

Section 1 (Identifying the Target Audiences and Their Needs):

In Pennsylvania, there is only one Implementing Agency (IA), and the IA has historically prepared the statewide needs assessment and used that data to prepare the Annual Request for Partners (RFP). It appears Section 1 can only be completed by the State Agency (SA). We recommend this be set up so that the SA can grant the IA access to complete content in Section 1. We also want to ensure that previous Sections can be edited as you progress through the modules.

PA SNAP-Ed Implementing Agency reiterates the following ASNNA team comment regarding the proposed Plan Form. Is there a way to streamline collection of secondary data sources or auto populate previous data to minimize burden?

Section 2 (State SNAP-Ed Action Plan):

In Pennsylvania, the Implementing Agency (IA) has historically prepared Plan objectives and used that information to prepare the Annual Request for Partners (RFP). It appears Section 2 can only be completed by the State Agency (SA). We recommend this be set up so that the SA can grant the IA access to complete content in Section 2. We also want to ensure that previous Sections can be edited as you progress through the modules. There is information collected from proposals that would require updates to Section 2. For example, some nonproject activities are planned and conducted at the Partner level based on local/regional needs and priorities, e.g., professional development, convening coalitions, contracted services not specific to a Project, etc. The SA and IA wouldn't have details on these activities until the Partner submitted their proposal in response to the annual RFP.

Section 3 (Planned Projects):

In Pennsylvania, the Implementing Agency (IA) prepares an Annual Request for Partners (RFP). Accepted proposals have historically been included in the PA SNAP-Ed Plan. N-PEARS does not provide a mechanism for including (uploading) Partners' Statements of Work. Does FNS not need to review/approve these documents? Are we expected to deconstruct the Partners' Statements of Work and enter that deconstructed data into Section 3 of the PA SNAP-Ed Plan? We expect there will be a significant administrative burden to compile and enter the necessary data from Partner Statements of Work for Section 3, e.g., partner-specific adaptations to interventions. To demonstrate scope, note that there are 21 FY23 PA SNAP-Ed Partner proposals.

SNAP-Ed Plan Form Page 3-7 states, "Projects may be implemented in multiple settings, but no single project site should be categorized as belonging to more than one setting." In Pennsylvania, settings are mapped to five of the statewide Projects (Community, Early Childhood, Food Assistance, Food Retail, and K-12 Schools). Some program delivery sites have multiple settings, e.g., a site may be a **school** (K-12 Schools Project), that includes **Head Start** classrooms (Early Childhood Project), has a **food pantry** that serves students' families (Food Assistance Project), hosts an **afterschool** program (Community Project) and a **USDA summer meals site** (Food Assistance Project). Disallowing this structure of multiple settings at a single site would limit a PA SNAP-Ed provider to one Project and one audience at each site. By definition, each Project includes a cluster of interventions with common target audiences and implementation setting types. PA SNAP-Ed's K-12 Schools Project does not include direct education or PSE interventions that are intended for Head Start children or food pantry clients.

SNAP-Ed Plan Form Page 3-9, SNAP-Ed Toolkit Interventions: What is the impact in N-PEARS when an intervention is removed from the SNAP-Ed Toolkit?

SNAP-Ed Plan Form Page 3-10, Other Previously Developed Interventions: Respondents must answer the question "Was this intervention approved for use by FNS?" It is unclear what constitutes approval for use. Is it approved for use if it was included in an approved Plan from a previous fiscal year?

Will all the Project data including intervention information entered in a previous year be accessible for preparing the next year's Plan with the option to edit?

Section 4 (Planned Evaluations):

In Pennsylvania, the Implementing Agency (IA) prepares an Annual Request for Partners (RFP). Accepted proposals have historically been included in the PA SNAP-Ed Plan. N-PEARS does not provide a mechanism for including (uploading) Partners' Statements of Work. Does FNS not need to review/approve these documents? Is the IA expected to deconstruct the Partners' Statements of Work and enter that information into Section 4 of the PA SNAP-Ed Plan? We expect there will be a significant administrative burden to enter the necessary data from Statements of Work for Section 4, e.g., partner-specific evaluation projects. To demonstrate scope, note that there are 21 FY23 PA SNAP-Ed Partner proposals and most include partner-specific evaluation projects.

Section 5 (Coordination and Collaboration):

Table P5.1 Planned Coordination and Collaboration With Other Federal Nutrition Education, Obesity Prevention, and Health Programs

It is unclear if this table is intended to describe only State level coordination and collaboration with entities, e.g., Pennsylvania Department of Education (NSLP, SBP, FFVP), that receive funding from those federal programs? Most PA SNAP-Ed Providers are locally based and coordinate and collaborate on a local or regional level with entities that are receiving funding from these federal programs, e.g., a school or school district receiving NSLP, SBP, FFVP, Team Nutrition, etc.

If Table P5.1 is supposed to reflect local, regional and State level coordination/collaboration... then, In Pennsylvania, the Implementing Agency (IA) prepares an Annual Request for Partners (RFP). Accepted proposals have historically been included in the PA SNAP-Ed Plan. N-PEARS does not provide a mechanism for including (uploading) Partners' Statements of Work. Does FNS not need to review/approve these documents? Are we expected to deconstruct the Partners' Statements of Work, compile, and then complete Section 5 of the PA SNAP-Ed Plan? We expect there will be a significant administrative burden to compile and enter the necessary data from Statements of Work for Section 5, e.g., e.g., local, regional, and State coordination and collaboration. To demonstrate scope, note that there are 21 FY23 PA SNAP-Ed Partner proposals.

It is unclear if the purpose "Needs Assessment/Plan Development" refers to the state level Section 1 Needs Assessment only or does it also encompass PSE Needs Assessment activities? Alternatively, should PSE Needs Assessment be included in the "PSE Change Efforts" purpose?

Table P5.2 Planned Engagement With Multisector Partnerships/Coalitions (ST8)

What is the basis for limiting multisector partnerships/coalitions to the requirement of 5 or more sectors?

Section 6 (Planned Staffing and Budget):

In Pennsylvania, the Implementing Agency (IA) prepares an Annual Request for Partners (RFP) to solicit proposals for the upcoming fiscal year's SNAP-Ed Plan. Submitted proposals include an Excel budget spreadsheet and staffing charts, and a Word budget narrative for each prospective Partner. When a Partner proposal is accepted, individual Partner fiscal documents are sent forward to the State Agency and FNS for review and approval as part of the PA SNAP-Ed Plan. This system does not seem to provide a mechanism for submitting these documents by Partner. Will FNS no longer review/approve those documents in the context of individual Partners and their proposed Statements of Work?

Tables P6.2b Planned Project Budgets

PA SNAP-Ed Implementing Agency (IA) has serious concerns about the feasibility of budgeting (and thus reporting) by “Project”. Many of the categories would overlap Projects (cluster of interventions with common goals, intended outcomes, target audiences, and implementation setting types) and the administrative burden to separate costs by Project for budgeting and reporting would be substantial.

In the context of PA’s budget submission, the “Project” designation seems to reflect the “Partner” designation in PA. Partners are Penn State entities (e.g., extension and faculty projects) and subrecipients who are contracted by Penn State to provide SNAP-Ed statewide. Each Partner has an individual budget submitted as part of the SNAP-Ed plan. Again, the administrative burden of allocating the costs in each Partner’s budget to what the system defines as “Projects” would be substantial.

Not all possible costs are reflected in the budget tables. Is there a mechanism for adding costs to these tables? If not, this table is not feasible for PA use. Is FNS making a change to allowable SNAP-Ed costs?

Table P6.2c. Planned Budget for Other Activities

It is not clear if this is where all IA costs would be entered. (State Agency does not have direct SNAP-Ed costs). If there is an expectation that the IA somehow split “Project” costs from “Non-Project” costs, this would be an excessive administrative burden.

Table P6.2d. Planned Total Budget

What “Non-SNAP-Ed Planned Public and Private Funding” must be documented is not clear, but perhaps that is because PA does not accept dollars from other entities to support SNAP-Ed programming.

Budget Narrative (Total Budget)

Not all possible costs are reflected in the budget narrative. Is there a mechanism for adding costs to the narrative based on costs listed in the budget tables? If not, this table is not feasible for PA use.

Table P6.3a. Planned In-State Travel

If daily trips to locations where SNAP-Ed programming is proposed are to be included in this section, as described, it is not possible to provide this level of detail.

PA SNAP-Ed Implementing Agency wishes to reiterate the following ASNNA team comments regarding the proposed Plan Form. (1) Planned Staffing and Budgets should be by Agency rather than by Project. (2) Streamline by being able to upload spreadsheets. (3) It is not feasible to provide the level of detail requested for budgeted travel expenses.