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As a retired 'veteran' of SNAP-Ed, I regretfully express serious concerns about the purposes, utility, and costs of the proposed N-PEARS electronic reporting system for SNAP-Ed and recommend taking a quick step back. I am fully committed to the statutory goal of N-PEARS to compile program outcomes and impact information electronically and to supporting USDA. The new SNAP-Ed team had the near-impossible task of having only a few months to catch-up on a 2018 unfunded mandate that received little support until 2021. However, I've carefully read the dense, complicated materials in the nearly 500 pages released on March 7 and fear that:

N-PEARS is unfit-for-purpose, and it exceeds the mandate. The 2018 Farm Bill required a new electronic system to compile information on SNAP-Ed outcomes, impacts, and administrative expenses. It did not require automating the much larger, complicated functions of state planning and annual reporting that N-PEARS requires. Most critically, there is no description of how the volumes of new information would be compiled into the mandatory state or national summary reports.

N-PEARS does not offer new value to state operations. The Public Records Act asks data systems to be useful to all stakeholders, not solely the Federal government. N-PEARS would not replace or simplify current annual planning or reporting activity; SNAP-Ed agencies will still prepare plans and reports for in-state use, so N-PEARS could effectively double the workload. There is no indication of outputs that would save effort. Pertaining to fiscal accountability, N-PEARS would require all SIAs to provide new, detailed sub-budgets for every single project. This is unnecessary because project budgets are not mandated by statute, generally they are not budgeted separately in the first place, and additional accountability is unnecessary. On this point, SNAP SAs are state social services departments that have always been fully accountable to USDA for SNAP-Ed expenditures. SIAs are universities, sister state departments, non-profits, tribal bodies, and some local governments operating under contract with state government. As such, SAs carry the full weight of the state in assuring accountability to USDA. The new level of budgeting is not required by statute, introduces significant unnecessary workload, and adds no value.

The costs are excessive. The burden estimation methods are hard for a layperson to decipher, but they appear to count only the data entry, not the costs of collecting and preparing the information for electronic entry in the first place, a brand-new workload. Even at that, the estimated burden of 390,000 hours and \$18 million is excessive. Out of the SNAP-Ed annual appropriation of about \$500 million, this is over 3% added to existing administrative costs. Put another way, \$18 million is enough to fund the 18 smallest state and territorial SNAP-Ed programs shown in Group A. Since SNAP-Ed funding has long been capped, a new requirement like this would divert resources away services into bureaucracy, not reduce administrative costs.

There are more than enough 'outcomes and impacts' each year for states to summarize and report electronically while the N-PEARS process is restructured to fulfill the statutory mandate. USDA should engage its contractors and practitioners as full partners to help reconfigure N-PEARS so it captures essential information that is useful at both the national and state levels.