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The Association of SNAP Nutrition Education Administrators (ASNNA) appreciates the opportunity to respond to the OMB call for public comment, ICR Reference Number 202211-0584-007, pertaining to the proposed new N-PEARS e-system developed for use by the Supplemental Nutrition Assistance Program Education (SNAP-Ed) in program planning and reporting. In an era when chronic diseases and social inequities are at the forefront of public concern (Biden-Harris Administration Strategy on Nutrition, Hunger and Health, Sept. 2022), SNAP-Ed services designed to support individuals and communities with low incomes are critical to reversing negative trends and reaching aggressive 2030 national goals. As the federal government's single largest nutrition promotion effort, SNAP-Ed programs in every state provide nutrition education and promotion; assistance with policy, systems, and environmental changes that help community organizations make healthy choices easy choices; social marketing campaigns; and results-oriented public/private partnerships in every state.

ASNNA respectfully submits its concerns and recommendations from the perspective of SNAP-Ed State Implementing Agencies, which plan, deliver, and continually improve SNAP-Ed services to the public. Within the 30-day period for review, our Task Force of experienced SIA leaders examined and discussed the complex OMB 'package', including all 8 appendices. Our 15 members were representative; they hailed from 10 different states in 6 of the 7 FNS Regions. They came from university, governmental, and non-profit SIAs. Most had served on ASNNA's N-PEARS Federal Register team in 2022.

ASNNA's comments are filed with the intent to be helpful, constructive, and used in opening ongoing collaboration with FNS and its contractors that will lead to N-PEARS becoming a standout success. In this spirit, our five submissions provide detailed observations and reference information. In summary, our principal concerns center around: a lack of information about how the newly required data will be used and reported out for national dissemination as required by the 2018 statute or for state-specific uses with communities and partners; a continued vagueness about the specific purposes, necessity, and utility of collecting such a large amount of new, detailed information; insufficient input, pilot testing, and revision by key partners in the design/development stages of the system; having no publicly available plans for short-term, first-year feedback and trouble-shooting (2023) or for longer-term action steps (FY 2024 on); and an unacceptably high projection of workload and costs to both Implementing Agencies and State Agencies that, if implemented, would lead to poor information quality and the diversion of staff away from service to administration.

ASNNA has a priority on demonstrating outcomes. Since the earliest years of SNAP-Ed, we have partnered with FNS, led organizational evaluation efforts, published peer-reviewed papers, and responded to Congressional concerns. We share FNS' urgency to capture and report SNAP-Ed outcomes and impacts across the country, and we're committed to electronic reporting. We are optimistic and committed to developing a strong partnership with FNS and its contractors to make the necessary improvements so that N-PEARS will develop into a premier, standout e-system in the very near future.