



August 9, 2022

Maribelle Balbes
Food and Nutrition Service
U.S. Department of Agriculture
Supplemental Nutrition Assistance Program
1320 Braddock Place, 5th Floor
Alexandria, VA 22314

Dear Ms. Balbes:

The Association of SNAP Nutrition Education Administrators (ASNNA) appreciates the opportunity to respond to the call for public comment on the proposed new N-PEARS e-system developed for Supplemental Nutrition Assistance Program Education (SNAP-Ed) program planning and reporting.

ASNNA was established in the late 1990s as the all-volunteer national member organization representing leaders who run SNAP-Ed programs. Now established as a non-profit, our 121 member organizations come from almost all 50 states, the District of Columbia, and the Territory of Guam. ASNNA's member organizations are among the 53 SNAP State Agencies (SA) and 168 diverse State Implementing Agencies (SIA) that administer SNAP-Ed in all regions of the country and across institutional types: 1864 and 1890 Land Grant University (LGU) cooperative extensions, other universities, state health departments, other state departments, non-profits, Tribal-serving organizations, and local governments. ASNNA is committed to continually strengthening the program to better serve the estimated 90 million people who are eligible for SNAP-Ed. By statute, these are people who may qualify for other federal nutrition assistance programs, not solely SNAP, and individuals in communities with a significant low-income population.

SNAP-Ed is the country's largest, most flexible, diverse, and responsive federal community nutrition education and promotion program; it focuses exclusively on low-resource communities where disparities are high. As such, SNAP-Ed is key to achieving the country's new food and nutrition security goals. A strength of SNAP-Ed is its comprehensive, flexible, multi-level public health approach that combines a mix of direct education; policy, systems, and environmental change; social marketing; and multi-sector collaboration strategies. We use evidence-based nutrition education interventions when available and develop new ones when they are not. The blend is designed to complement and capitalize on other resources to maximize the SNAP-Ed investment and better meet statewide and local needs. A unique strength is that SNAP SAs in state social services agencies contract with diverse organizations, known as SIAs, that have staff with the expertise, partnerships, organizational position, and resources to support a variety of statewide and community initiatives. Some SIAs also fund Local Implementing Agencies (LIA). SAs and SIAs may each fund other contractors for different functions such as evaluation, training, or marketing. This complex network of organizations works together and with its partners to anticipate and respond to state and community needs.

ASNNA and its committees are structured around supporting the success of SNAP-Ed, working in collaboration with the USDA Food and Nutrition Service (FNS). Since forming in 2012, the ASNNA Evaluation Committee has engaged SNAP-Ed practitioners and worked cooperatively with USDA to

deliver on the statutory mandates of the 2010 Healthy, Hunger-Free Kids Act and the 2018 Farm Bill. We have driven development of and/or provided technical assistance on development and implementation of the *SNAP-Ed Evaluation Framework* and its companion *Interpretive Guide* (2016), multiple editions of the *SNAP-Ed Toolkit*, and three national censuses to monitor uptake of the *Framework*. We support a half dozen technical teams that meet monthly to focus on retrieving results from SNAP-Ed activities conducted at different levels of the *Framework*. Most recently we began an ASNNA-wide effort to comprehensively update the *Framework* based on our first 6 years of state-level experience. Our position paper, *Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill* (2020), exclusively addresses the new e-reporting requirements. Some of our work products are found on the evaluation section of our website (link: <https://asnna.us.org>). ASNNA's allegiance to evidence-based interventions and best-practices are a foundation that ensures the success of the program. Our Race, Health, and Social Equity Committee and Social Marketing Committee each have collaborated to work with USDA on peer-led guidance to the field on these topics.

An analysis of SNAP-Ed Annual Reports done in 2018 on behalf of FNS found that there were over 2,500 evaluation reports submitted over 3 years, so it is essential that any future e-system accurately capture and aggregate them. From a national perspective, the new e-system must be designed to lift up the positive changes occurring among individuals, organizations, and low-income communities participating in SNAP-Ed. SNAP-Ed policy goals that are critical for the nation and states to capture include, but are not limited to, fruits and vegetables, other healthy foods, sugary foods and beverages, food security, physical activity, and ways to show how SNAP-Ed can help leverage the collective impact of USDA programs and engage SNAP-Ed's estimated 30,000 organizational partners in positive change in low-resource settings. A full set of priority outcomes, including selected social determinants of health, is found in the *SNAP-Ed Evaluation Framework* (2016).

SNAP-Ed operates under the mandates in the 2018 Farm Bill, with an anticipated new Farm Bill coming in 2023. The 2018 Farm Bill provided multiple requirements for FNS and SNAP-Ed state agencies:

- states must use an electronic reporting system to evaluate projects and administrative costs;
- USDA must establish an online clearinghouse of appropriate interventions for target populations;
- USDA must provide technical assistance to States in the development and implementation of state SNAP-Ed plans;
- state agencies must submit annual reports that can be publicly available that include the use of funds, project descriptions and "a comprehensive analysis of the impacts and outcomes," and the status of multiyear projects; and
- FNS, in consultation with the National Institute of Food and Agriculture, must submit annual reports to the House and Senate Agriculture Committees highlighting coordination between USDA nutrition education programs and the use of funds.

We share USDA's feeling of urgency to have the new State Plan (SP) and Annual Report (AR) e-systems required by the 2018 Farm Bill in place, at least in a pilot stage, before the 2023 Farm Bill. As part of the national SNAP-Ed team, we too need to be well-positioned to showcase progress since 2018. We need to lift up SNAP-Ed impacts with key stakeholders and show that our efforts are responding to the Government Accountability Office, Congress, and other stakeholders who want USDA to develop stronger internal infrastructure, especially related to coordination, shared expertise, and public/private efforts. ASNNA is committed to these goals, and we have worked to build capacity in this flexible, responsive state program to plan for and report on the wide range of benefits it generates.

However, our review of documents in the June 10, 2022 *Federal Register* has concluded that moving forward with implementation of the proposed N-PEARS e-system starting in October 2022 (by building toward the FFY 2023 Annual Report) is premature, thereby potentially threatening the success of the entire e-system. We have found that the amount of information that the proposed N-PEARS e-system asks for in the nearly 400-page proposal is excessive; the role delineation between SAs and SIAs is not consistent with long-term, successful practice; formatting and data management among sections and between the SP and the AR are still very much a work-in-progress. N-PEARS is based in part on the existing Education and Administrative Reporting System (EARS), which has not generated needed program reports; there is no information indicating what outputs the system will generate with the massive amount of new information that would be collected. It clearly is not ready for implementation on October 1, 2022, as proposed. Additional time is required for an open, transparent process that can fully vet recommendations about the proposed e-system, secure full participation in revising it and establish consensus about priority informational needs, then conduct pilot tests and smaller demonstration projects prior to full-scale implementation. The contractor that informed some of the pilot work in 2020 echoed these recommendations and, importantly, recommended a 3-5 year pilot in their report to FNS.

Recognizing the need to tell a national story, ASNNA formed a team of members to review the proposed e-forms using their content expertise and experience with SNAP-Ed planning, implementation, and reporting. The team is a cross-section of 17 members from 6 of the 7 Food and Nutrition Service regions; 14 states; 8 Land Grant Universities (LGUs); 3 other institutions of higher education; 2 nonprofits; 2 state government agencies; and ASNNA's 4 standing committees. Please note that ASNNA members participated in this review as members of ASNNA, and their views may not directly reflect the views of their employers. In the very short time available, we did our best to understand the design, the interplay of its components, and how such a novel, complex system would work for our members as they run diverse SNAP-Ed programs across the country. We carefully reviewed the 260-page wireframe, the 85-page draft of instructions, and a multi-tabbed estimate of burden worksheet for completing the SP and AR. Enclosed are two summaries of their work over the past 6 weeks. *ASNNA Findings and Recommendations Responding to the 4 Questions in the Federal Register* and *ASNNA's Consolidated e-System Review, Summer 2022* delineate our team's preliminary findings, concerns, and recommendations. They, along with team discussions and ASNNA's 2020 position paper, *Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill*, form the basis for the conclusions and recommendations that follow.

In response to the 2018 statutes, we appreciate the efforts that the Food and Nutrition Service has taken to build a new pilot electronic SNAP-Ed plan and reporting system, but we are concerned that the proposed system does not sufficiently support the USDA's mandates outlined in the 2018 Farm Bill or states' needs for an efficient, illuminating reporting system. We recognize that FNS also serves as a champion of SNAP-Ed, providing us the tools we need to do good work on behalf of the agency and the public. Unfortunately, the proposed forms do not capture the needs of states for a flexible, responsive, dynamic, and practical SNAP-Ed reporting system.

Our team of ASNNA representatives has concluded that the proposed new e-system is not yet well aligned with real-world SNAP-Ed implementation and, as designed, would negatively affect the program's ability to continue delivering results. We therefore strongly recommend a more structured and inclusive development timeline that has rigorous benchmarks be substituted for the proposed implementation date of October 1, 2022.

The comments below reflect what a representative team of ASNNA members was able to conclude, at a high level, about the four response categories in the *Federal Register* as well as the value of the proposed e-system as a tool for FNS and the public to visualize SNAP-Ed outcomes. The timing, size of the package, and complexity of the proposed e-system prevented many states and agencies from participating in the review and should not be viewed as either disinterest or support for the proposed e-system. Further, it is impossible to understand and comment on the full impact without experiencing the proposed e-system, which was not possible because of the truncated timeline and limited access. This letter includes a summary of basic recommendations for moving forward with further design, development, pilot testing, and process evaluation of the proposed e-system in support of successful introduction and implementation in the future. We offer suggestions for what the development timeline should include.

(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.

Lacking proper formative research and process testing, the promise of this system will not be reached and, thus, will lack practical utility in the long-term for FNS. The proposed e-system has neither incorporated sufficient input from critical stakeholders, including SNAP-Ed practitioners and the communities and people we serve, nor undergone the testing necessary to assure it will fulfill its purpose as it is currently designed.

From the perspective of this team of experts, many data points that are requested in the SP and AR seem excessive and beyond the scope of the program's impacts and outcomes. The practical utility of the level of minutia created by the proposed e-system is not apparent given that no dashboard or reporting outputs have been incorporated, even though the reporting of outcomes is one of the key reasons to develop this system. FNS should work with states to prioritize the key information essential for fiscal integrity and reporting on high level outcomes and results, as outlined in the 2018 Farm Bill. Without this step, it will be difficult for SNAP-Ed agencies to decipher and prioritize what needs to be aggregated and evaluated. With implementation of the AR proposed to begin on October 1, 2022, and unclear priorities, states have inadequate time to update processes for collecting indicator data as outlined by this proposal. Once the priority endpoints are clear, time is required to select validated instruments, or develop new ones, and train staff. Otherwise, the data will be of unknown accuracy and questionable usability. Apart from the formal reporting system, states and communities can capture the level of detail needed to develop and maintain meaningful programming.

The detailed fiscal breakdown of all program elements, including costs by artificially-defined "projects", does not align with real-world implementation. State plans are written up to 8 months ahead of implementation which precludes the ability to offer precision in this exercise and predicts a certain cascade of administratively burdensome amendments and internal tracking systems that are not necessarily aligned with state or organization tracking systems. The minutiae of costs and program elements that are proposed to be tracked do not enhance program performance or efficiency. In the enclosed *ASNNA Findings and Recommendations Responding to the 4 Questions in the Federal Register* document, there are multiple examples of excessive data collection in the proposed e-system, which we could help FNS resolve with further discussion about, development, and testing of the system.

In addition, evaluation options exclude techniques needed to gather insights from the SNAP-Ed audience, especially segments that are often underserved. Knowing that equity is a priority for the USDA, SNAP-Ed must have the flexibility to adjust programming and evaluations to best suit the audience and provide SNAP-Ed participants the opportunity to share their voices. Searching for utility at

the expense of equity contradicts the USDA's commitment to ensuring no USDA "customers are ignored or left behind" (link: <https://www.usda.gov/equity-commission>) and perpetuates the inequity of regressing to the mean, thereby muddling diversity and reverting to times of token inclusion.

Full-circle testing of the proposed forms with constructive feedback loops is necessary to properly design any e-system. The new timeline should provide time for SAs and SIAs to pilot elements of the proposed e-system after further development and ahead of the next Farm Bill in 2023 or 2024, well before FNS finalizes it for field testing. Then, further testing would let SNAP-Ed agencies and FNS work together to identify the strengths and weaknesses of the proposed forms. This will provide time to clarify terms, models, and output reports for the system, make additional adjustments, and ensure that resources are not wasted due to an under-tested system. This process will also safeguard the agency's commitment to equity.

(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.

The accuracy of the estimated time burden is difficult to assess because the methodology to develop the base number of hours for each activity for each agency type was not included in the *SNAP-Ed N-PEARS_BurdenTbl*. We understand that only five to seven out of the 168 SIAs are in the process of testing the proposed e-system to provide the basis of the national time burden assessment, meaning that the burden of real-world use has not been incorporated. Taking the time to fully test the e-system and talking with testers about their experience using the forms is needed to enhance the accuracy of the estimated time burden.

According to the table, there is an assumption that technical staff will complete most of the SP and AR, with managerial staff completing only the staffing and budget portions. Experience shows that technical staff are not always the ones compiling the documents. The salaries for nonprofit respondents, while sourced from the Bureau of Labor Statistics, do not align with known salary ranges for nonprofits delivering SNAP-Ed, which function to retain highly qualified personnel. Further, there are missing levels of staff, per federal classification, who are often involved in plan and report completion (e.g., evaluators who are classified as scientists). These assumptions skew the labor hours per staff classification and impact respondent costs, likely making them lower than they actually are. The staff classifications need to be built out and more accurately reflect the realities of who is completing the plan and report.

The estimate of burden is also examined based on agency type and large vs. small Implementing Agencies. Regardless of agency type or size (the definition of which is not standardized), all of the same information collection and entry will need to be completed (i.e., address all of the same sections). Without real-world testing, it is unknown whether it will take some agency types (or sizes) fewer or more hours. This, again, underscores the importance of testing the proposed e-system with implementers, gathering their feedback, and then developing a solid estimate of the burden for completion.

(c) Ways to enhance the quality, utility, and clarity of the information to be collected.

Given the time allotted for review and comment, ways to enhance the quality, utility, and clarity of information to be collected is too broad a topic and can only be addressed superficially here. If the proposed e-system is an effort to collect information appropriate for federal assurance of SNAP-Ed accountability, then the approach must include testing and input from state partners who also are responsible for SNAP-Ed, rather than solely a top-down approach. Many ASNNA members who are part

of this *Federal Register* review team also participated as invited participants in the Technical Working Groups and Steering Committee to provide input into ways to enhance quality, utility, and clarity of information collected through an e-system. Upon review, however, the feedback and guidance provided by these SNAP-Ed practitioners seem only tangentially reflected in the proposed forms. What was shared for public comment does not fully align with the tone of the discussions and conclusions formed in the working groups.

Looking at the proposed SP and AR documents, we reason that ways to enhance quality, utility, and clarity of the information to be collected should start with attention to SA capacity for, experience with, interest in, and even appropriateness of completing meaningful needs assessments and action plans. SAs run many large, visible, demanding and often-controversial social programs, including SNAP, so simultaneous participation by, or delegation to, the SAs that are responsible for delivering and evaluating SNAP-Ed is essential. Needs assessments directly inform programming and subsequent outcomes. In communicating with SAs across the country, it is evident that many SAs rely on SAs to complete needs assessments, identify priority areas, and develop objectives.

The proposed SNAP-Ed SP calls for SAs to take the lead in these areas, while only encouraging collaboration with SAs. In practice, instead of lifting up collaboration, there is potential for further isolation among entities doing SNAP-Ed work. If an option is for SAs to hire consultants, the quality and clarity of information collected becomes more questionable. Consultants may not have awareness of or experience with delivering SNAP-Ed in a given state, nor would they know details of information needed for working with partners to identify priority areas, choose practical performance indicators, or set realistic objectives. Experts experienced in these areas exist within the SAs. Regardless of the decisions as to how to increase engagement of SAs about the needs within their states, acquisition of new skills in developing needs assessments and how to apply them need a “learning on-ramp” longer than 3 months and utilization of principles of adult learning.

Another priority issue to lift up is that the proposed e-system includes a narrow scope of the types of information that can be included. The focus on the methods to standardize the data collected in the SP and AR perpetuates systematic hierarchical processes that are deleterious to community-based and participant-informed work. As SNAP-Ed matures, a mixed-method approach has become increasingly essential. The proposed e-system and associated instructions do not appear to encompass the diversity of longer-term SNAP-Ed programming with increasingly engaged community members and partner organizations, nor the different audiences and stakeholder groups with which SNAP-Ed works, thus perpetuating inequities in implementation. Priority areas, indicators, and SMART objectives in the proposed e-system appear to be developed prior to SIA involvement, which excludes not only the practitioners but also organizations that plan and deliver programs at the grassroots level.

SNAP-Ed’s strength is its diverse implementation model and programming rooted in community-based information that situate program development, delivery, and evaluation in ways to be acceptable and effective for communities. SNAP-Ed programming is not static; modification in delivery and evaluation occurs as work is conducted all year long. Adaptation and development of new efforts occur in response to experience on the ground. FNS must encourage and support maximum flexibility for states to identify and respond to community needs through qualitative data and mixed methods approaches. In addition, the proposed e-system appears to focus on a deficit-based approach to assessing community and population needs. Instead, an asset-based perspective to assessing needs that builds on knowledge of community strengths while addressing identified needs is essential. It is time for a paradigm shift, deficit- to asset-based, in how we approach needs assessments to ensure that equity is centered as part of this effort.

Relative to the quality of the information collected, in a world where digital media is ubiquitous and in a program with strategies that are designed to touch all levels of the social ecological model – individuals, organizations, mass communications, and through partner organizations that convey messaging, modify the environments in which people make healthy choices, and otherwise adapt their own systems to support health – the concept of unduplicated reach needs to be revisited. Best-practices in empowering behavior change include using multiple modalities to generate the most exposure possible to relevant, actionable messages and to new environmental conditions that make healthy choices the easiest, most accessible, and affordable in locations where behavioral decisions are made.

(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.

In the proposed e-system timeline, there is a very high burden of manual data entry for the 2023 AR. Being required to use the proposed AR form for FY 2023 reporting when FY 2023 SPs are not in the proposed e-system means all of the information will need to be manually collected and inputted. As described above, with the forms themselves being unclear and still in flux, this will result in wasted effort and has questionable value in producing good information for the nation. This adds another reason to delay the start of the new e-system until it has been fully tested and each state is able to complete the SP with a well-developed, user-informed e-system.

To start, all of the information input into the SP will need to be manually entered and only some of that information will be auto-populated into the AR. Streamlining data and information collection by providing features to link to, upload, or auto-populate data from national and in-state sources are needed. Creating an application programming interface (API) that connects with state-level data collection systems such as PEARS, excel spreadsheets, accounting programs, software systems, and other automated management tools is essential to reduce the burden of data entry and analysis.

There are also multiple layers of information collection and entry into the proposed e-system. Some sections are to be completed by the SA, but will still require input from SIAs. Thus, introducing a needlessly iterative process for collecting and sharing the information increases the likelihood of errors in data entry and further increases the burden of data collection, synthesis, and entry. Providing simultaneous access by SIAs to all sections of the SP and AR is needed to streamline information collection and provide for efficient data entry and analysis.

The definition of project “as a set of activities or interventions executed by a single agency with common goals, intended outcomes, target audience, and implementation setting” is extremely problematic. This definition is neither realistic, practical, nor aligned with the coordinated implementation of SNAP-Ed activities among SAs, SIAs, and even nationally. For states with numerous projects, sometimes upwards of 75 projects or more, entering planned activities for each project and then having to report at both the project and site level introduces duplication and increases the burden of data collection and entry. The intent should be to plan for projects that accomplish *SNAP-Ed Evaluation Framework* outcomes and then to be able to report and aggregate those outcomes to show program impact.

Defining the term ‘project’ more in line with current practice will help address the problems identified by the proposed definition. The ASNNA Position Paper provided the recommendation to “Define the term ‘projects’ at the state-level as clusters of interventions [direct education, PSE, social marketing] with common themes that reflect the integration of complementary, multi-level approaches and partnerships.” These would be designed to achieve results in the *SNAP-Ed Framework* and other state

priorities, and projects may be conducted independently or cooperatively by any combination of SAs, SIAs, LIAs or other contractors. This will corral the number of projects to manageable, aggregable groups for national reporting purposes without losing the richness and innovation of the multifaceted SNAP-Ed approach described in the *SNAP-Ed Evaluation Framework and Interpretive Guide*.

The work SNAP-Ed practitioners do is rooted in community needs, thus projects evolve over time, introducing new components to respond to changing needs as informed by process evaluation, essentially updating projects every year. This means ongoing projects will need to add new components, thus not being able to take advantage of features to auto-populate from the previous year. This will increase the burden of data entry. To minimize this, it is important to have electronic features that can update the projects with new components without needing to re-enter each as a new project every year.

Finally, the current structure of the e-system duplicates information being collected for state and federal purposes. Without auto-population features and software that allow data transfer between the state and federal systems, data/information needed for federal reporting and in-state purposes must be re-entered into one or the other of the systems. Other examples of duplication include needing to enter the level of evidence for an intervention multiple times, if that intervention is being used with more than one project, and duplication of information entry for systems-level changes that affect multiple sites. Again, having auto-population and API features as part of the e-system will reduce duplication in information entry in addition to eliminating the possibility of errors due to manual entry of secondary data.

Some specific recommendations for technical improvement are provided in section 4 of the ASNNA *Findings and Recommendations Responding to the 4 Questions in the Federal Register* (enclosed). They include, but are not limited to, USDA and ASNNA working together to:

- Develop a customized, pre-populated needs assessment template that includes national statistics from reputable public and private sources provided at the lowest geographic level, such as census tract, zip code, or county, and that can upload data from in-state sources such as surveys, reports, and reporting systems;
- Design the e-system so it can provide reports back to states for in-state management and reporting to partners; and
- Conduct inclusive, transparent demonstration and pilot projects iteratively to test informational outputs (tables, graphics, 508 compliance, *Framework* indicators, and other analyses and depictions) with collective decision making processes before formal field testing and nationwide roll-out.

In summary, our comments and accompanying documents are preliminary and represent what ASNNA members have seen and experienced so far with the proposed e-system, mostly as a graphic representation, during this very limited time frame for review. In its current iteration, there is no noticeable added value with the data that can be extracted to inform programming or be shared with communities served through SNAP-Ed. More minutia collected in the proposed e-system does not automatically result in robust storytelling nor equal easier packaging and dissemination of SNAP-Ed impact. The proposed e-system will not yet support the function of aggregating data while providing a comprehensive analysis of the program's impacts and outcomes as intended. Having contractors who say "we will do that in the future", which is the current situation, directly calls for the nascent e-system to be a pilot.

Crucial steps have seemingly been skipped or minimized, and feedback from the groups convened so far seem to be working in isolation and at cross purposes. Designing any new system from start to finish should be transparent, iterative, and collaborative with stakeholders at all levels. An equitable process is necessary to develop a new system where stakeholders and potential users have access to shared information and where conclusions developed and decisions made are explained and justified. This approach increases the likelihood that the resulting system will integrate equity in planning and reporting that promotes diversity and inclusion. While ASNNA appreciates the focus on equity in the USDA's actions on nutrition security and in SNAP-Ed, the new proposed plan and e-reporting system do not align with this initiative because it limits community-centered solutions and evaluation. The participants in SNAP-Ed are not research subjects. Our goal is to evaluate our effectiveness in empowering participants to make healthy choices and helping enable communities to support such choices.

Of key importance is to recognize that the currently proposed nascent e-system will not realize the potential of a fully developed system in time to inform the next Farm bill. Considering where we are in the timeline of the 2018 mandate, we recommend describing to Congress that this public comment period revealed many new requirements in the field and thus the necessity of an extended 3-5 year pilot phase with demonstration projects to further engage expert stakeholders to tell the story of this uniquely impactful program. Work to-date on the proposed e-system begins the process of meeting the progressive requirements of the 2018 Farm Bill. We must use the remaining period ahead of the 2023 Farm Bill to initiate sound process evaluation to progress development of the proposed e-system to meet user needs at state and national levels. Our strong recommendation is, through formal pilot tests and demonstration projects, to redefine the steps and timelines needed to successfully stand up a forward-thinking, flexible e-system that better aligns with how the program is implemented, recognizing the diverse models of implementation and meeting the needs of very diverse stakeholders. Diversity is our strength.

Sharing the story of SNAP-Ed impact is essential. There are currently no known dashboards or other stakeholder-friendly outputs that provide effective tools for FNS, Congress, and the public to visualize and understand SNAP-Ed outcomes. ASNNA whole-heartedly embraces the promise of a cutting-edge reporting system that both informs program growth and shares program impact with all stakeholders. Issues in the proposed e-system can be mitigated. This e-project can evolve to reach its potential. It is not there yet. ASNNA members are ready to engage with our respected federal colleagues in a sound, transparent process to grow an e-system that tells all stakeholders that SNAP-Ed works.

Respectfully submitted,

ASNNA membership as represented by:

Leadership Team
Advocacy Committee
Evaluation Committee
Finance Committee
Race, Health, and Social Equity Committee
Social Marketing Committee

Enclosures:

- *ASNNA Findings and Recommendations Responding to the 4 Questions in the Federal Register*
- *ASNNA's Consolidated e-System Review, Summer 2022*
- *Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill: A Position Paper of the Association of SNAP Nutrition Education Administrators (ASNNA)*