



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)**



ACKNOWLEDGMENTS

The Association of SNAP Nutrition Education Administrators (ASNNA) extends its appreciation to leaders from 21 states who participated in a workshop on implementing provisions of the SNAP Nutrition Education and Obesity Prevention Services Grant Program (SNAP-Ed) in the 2018 Farm Bill. The convening was held on February 3, 2020, in Alexandria, Virginia.

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In particular, ASNNA recognizes the commitment of their Evaluation Committee's writing team, which compiled this position paper over subsequent months and guided its review by representatives of Advocacy, Social Marketing, and State Agency membership. Writing team members include: Lola Adedokun (KY), Kate Balestracci (RI), Pamela Bruno (ME), Carrie Draper (SC), Susan Foerster (CA-Ret), Karen Franck (TN), Kimberly Keller (MO), Anne Lindsay (NV), Lauren Whetstone (CA), and Gail Woodward-Lopez (CA).

Special thanks are extended to Cindi Kay Morehead (NV) for design, layout, and photography. Colleagues in California, Georgia, Kansas, Maine, Michigan, Nevada, and Pennsylvania contributed photos of SNAP-Ed in action where people live, shop, play, learn, and work. Additional credit goes to HealthMPowers for the photos "ECE and ELE physical activity" and "Taste Truck Signage".



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EXECUTIVE SUMMARY

The Nutrition Education and Obesity Prevention Grant Program, better known as SNAP-Ed, is the nutrition arm of the United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP). SNAP-Ed is the largest single federal program that focuses on improving the Nation's health and well-being through the promotion of healthy eating, physical activity, and obesity prevention.

This position paper identifies ways that SNAP-Ed State Implementing Agency (SIA) members of the Association of SNAP Nutrition Education Administrators (ASNNA) recommend implementing six new provisions of the *Agriculture Improvement Act of 2018*, also known as the Farm Bill.¹ The 2018 SNAP-Ed requirements are for: a publicly available Annual State Report, an Annual Federal Report, an online information clearinghouse, technical assistance to states, electronic reporting systems (ERS), and the reporting of fiscal administrative expenses. This position paper provides details of each requirement, with recommendations and accompanying rationales.

The following summarizes the six new requirements in the 2018 Farm Bill with ASNNA's corresponding recommendations.

Publicly Available Annual State Report: *Each State Agency that delivers SNAP-Ed must submit an annual report that shall be made publicly available by the Secretary. It shall include a description of each project, an analysis of impacts and outcomes of each, the status of any multi-year projects, and the use of funds for administrative costs in eight categories.*

Recommendation 1: Establish an electronic template that uses the *SNAP-Ed Evaluation Framework* as a guide and is suitable for posting on a USDA website. The template should provide for a concise state report, prompt public availability, compliance with the Americans with Disabilities Act (ADA)/508 requirements, infographics, and text fields that limit the length of narrative content. The format and organization of the template should be standardized in a way that enables the reader to quickly locate information of interest and find similar information in the same location and presented in a similar fashion across states. The content should be designed to include information that can help populate relevant sections of the new Annual Federal Report and that can be supplied through state ERS.

Annual Federal Report: *The USDA Food and Nutrition Service (FNS), in consultation with the National Institute of Food and Agriculture (NIFA), must submit an Annual Federal Report to the Senate and House Agriculture Committees that evaluates the level of coordination between SNAP-Ed, the Expanded Food and Nutrition Education Program (EFNEP), and any other nutrition education program administered by USDA, and on the use of funds spent on such programs, including State Agency administrative costs in eight categories.*

Recommendation 2: As with the Annual State Report, the Annual Federal Report should be available to the public. This report should address statutory and Government Accountability Office (GAO) concerns; the unique impact of SNAP-Ed (including key metrics from the Annual State Report); coordination efforts among all federally-funded nutrition education programs; progress on strengthening technical assistance and the SNAP-Ed online clearinghouse; expenditures in the eight categories of State Agency (SA) administrative costs; and the dollar value of SNAP-Ed grants awarded to SAs and of contracts awarded by SAs to other contractors, if any. It should describe national FNS expenditures for SNAP-Ed support services specified in this statute, such as the advanced online clearinghouse, technical assistance and training, the ERS for state projects and SA fiscal expenses, and any federal contracts such as for evaluation, research, or pilot projects.

Online Information Clearinghouse: *USDA must establish an online clearinghouse with best practices for planning, implementing, and evaluating services appropriate to the SNAP-Ed target populations and make it widely available to state and local agencies, universities, and community organizations.*

Recommendation 3: Base the design of an advanced online clearinghouse on the expressed needs of SNAP-Ed and similar practitioners so as to increase the access and usability of data from federal and other sources in accord with the Federal Data Strategy and the Federal Evidence Act. Continue updating the current USDA websites and establish a new clearinghouse that provides a central source for population and system demographics and for relevant social determinants of health. Establish a searchable compendium of SNAP-Ed outcomes in peer-reviewed papers and the grey literature (reports, documents, data, and other materials self-published by governmental and other authoritative sources) at individual, environmental, sectors of influence, and population levels of the *SNAP-Ed Evaluation Framework*.

Technical Assistance: *USDA must provide technical assistance to State Agencies in developing state plans by identifying common challenges, coordinating efforts to address the challenges, collecting and disseminating information on evidence-based practices, facilitating communication between and among grantees and sub-grantees, and assisting State Agencies in creating or maintaining systems to compile program data.*

Recommendation 4: USDA, its seven FNS regions, and states should work together to develop an infrastructure with robust technical assistance capacity to provide ongoing subject-matter representation and models of exemplary peer programming, especially for outcomes in the *SNAP-Ed Evaluation Framework*. Cultural relevance and equity must be addressed across all topic areas. Technical assistance should integrate the latest theories, tools, and methods to understand, describe, and apply interventions that address the dimensions of disparity that influence SNAP-Ed eligible populations. USDA and states should assess SA and SIA training needs annually and establish a yearly training plan that aligns with the new *USDA Science Blueprint* and supports externally funded research strategies that build the science base for large-scale, community-based SNAP-Ed programming.

Electronic Reporting Systems for Projects in State Plans: State Agencies must describe in their state plan how they will use an electronic reporting system to measure and evaluate projects that are conducted through SNAP-Ed.

Recommendation 5: SAs and SIAs should maintain autonomy in their selection of customized ERS to manage state programs and to feed aggregated state information into the mandatory federal reporting system (Recommendations 1, 2, and 6). Technical and fiscal support for the state-level ERS should be provided to assure consistency, aggregability, and quality. Any required federal reporting should draw from and include key information from reports described in Recommendations 1 and 2 and not require additional reporting on the part of the states.

Electronic Reporting of Fiscal Administrative Expenses: State Agencies must describe in their state plan how they will use an electronic reporting system to account for allowable State Agency administrative costs in eight specific categories: salaries and benefits, office supplies and equipment, travel, nutrition education materials, professional activities, lease or rentals, maintenance and repair, and indirect costs.

Recommendation 6: Update the budget categories used in the SA state plan and Annual State Report with the eight categories required by statute. Add a ninth cost category for grants that SAs award to SIAs and, where applicable, for SA contracts to any specialized vendors for statewide support services to the SIAs. Technical and fiscal support for state-level ERS should be provided to assure quality fiscal reporting.



BACKGROUND

The United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP) is by far the largest component of the Nation's nutrition security system. In 2019, SNAP provided about \$56 billion in electronic benefits for food to an estimated 36 million Americans experiencing very low income.² As the nutrition arm of SNAP, the Nutrition Education and Obesity Prevention Grant Program, better known as SNAP-Ed, is intended to help two similar audiences make healthy food and physical activity choices consistent with the *Dietary Guidelines for Americans (DGA)*.³ The first group is SNAP-eligible people – those with incomes below 130% of the Federal Poverty Level (FPL). The second is people with slightly higher incomes (below 185% of the FPL) who qualify for other federal assistance programs, such as child nutrition, senior meals, and the Women, Infants, and Children (WIC) program. To reach these groups, SNAP-Ed targets settings, sites, census tracts, media outlets, and communities where most persons have low incomes. In 2018, about 87 million people with low incomes were income-eligible for SNAP-Ed, which was 27% of the US population.⁴ The 2021 appropriation for SNAP-Ed is \$448 million, or about \$12 per person annually.⁵

State social service departments serve as the SNAP State Agencies (SAs) that, in 2021, will administer SNAP-Ed grants to over 160 diverse State Implementing Agencies (SIAs) in all 50 states, the District of Columbia, and the Territory of Guam.⁶ SIAs include universities, non-profits, state health and agriculture departments, and Indian tribal-serving organizations. In turn, many SIAs sub-contract with other organizations that can deliver local or specialized services to diverse segments of the low-resource population, to regions within a state, and to communities where the majority of residents have low incomes. SNAP-Ed is the largest single federal program that focuses on improving the Nation's health and well-being of low-income people through the promotion of healthy eating, physical activity, and obesity prevention.⁷ It does so in partnership with public, non-profit, and business sectors at the state, tribal, and community levels.

SNAP-Ed is extensive, far-reaching, and has widespread support. Although the *2010 Healthy, Hunger-Free Kids Act*⁸ capped the annual appropriation at its 2009 funding level (with a Consumer Price Index adjustment for inflation), the number of SNAP-Ed grantees has grown markedly since the cost-sharing Federal Financial Participation mechanism was replaced by grants to states. From 2010 when about 100 SIA's participated, by 2021 the number of SIAs had grown to 160. The latest available data show that in 2017, states reported providing policy, systems, and environment (PSE) supports in nearly 80,000 low-resource sites.⁹ In 2018, 3.8 million people participated in direct education,⁷ and 61 social marketing campaigns were conducted in 31 states and the Territory of Guam.¹⁰

SIAs deliver evidence-based and science-informed, long-term, comprehensive, multi-level interventions based on each state's assessment of its own needs and resources.⁵ SIAs and their sub-recipients provide direct education across the age spectrum. They help coordinate PSE initiatives in low-resource communities and deliver social marketing campaigns aligned with the needs of the people they serve. By developing and evaluating new interventions that support underserved groups, taking them to scale, and working to sustain them over time, SNAP-Ed has become the Nation's largest single laboratory of innovation for large-scale, population-oriented approaches that promote healthy eating, physical activity, and obesity prevention. Developing diverse approaches tailored to low-resource settings, disseminating new knowledge, coordinating efforts within and among states, strengthening evaluation and reporting, and fostering peer support and technical assistance are long-standing focus areas within SNAP-Ed. Most recently these functions were codified by the Agriculture Improvement Act of 2018, also known as the Farm Bill.¹

The Association of SNAP Nutrition Education Administrators (ASNNA) represents professionals from SIAs and SAs that administer, implement, and evaluate SNAP-Ed programs. As an all-volunteer organization, ASNNA has worked in partnership with the USDA's Food and Nutrition Service (FNS) to develop cutting-edge, results-driven, theory-based resources such as the *SNAP-Ed Evaluation Framework and Interpretive Guide*¹¹ and the *SNAP-Ed Toolkit*¹² which provide dynamic practitioner resources for the Nation. SIAs were instrumental in identifying and establishing consensus on the 51 outcomes in the *SNAP-Ed Evaluation Framework* that have become the backbone for evaluating SNAP-Ed programming for individuals, environmental settings, sectors, and population segments.^{13, 14}

Health and well-being of all people and communities are essential to a thriving, equitable society. ASNNA supports SIAs by disseminating timely information, providing a venue for coordination and problem-solving, and advancing large-scale efforts to eliminate diet and physical activity disparities in low-resource settings. ASNNA conducts a periodic census of SIAs to identify and track current evaluation practices.¹⁴ The Association convenes committees and working groups to address policy topics that affect program administration, implementation, and evaluation. ASNNA members are committed to pursuing racial, social, and economic justice by working with others and conducting programs that reflect cultural competence, inclusivity, and advocacy for PSE changes that improve health equity.



METHODS

In July of 2019, the ASNNA Evaluation Committee engaged its members to study and discuss options for implementing the six statutory requirements enacted in 2018 and to examine recommendations of the Government Accountability Office (GAO) about actions needed by USDA nutrition education programs.⁷ They reviewed the program's history, past evaluations, and states' reporting experiences.¹⁵⁻²¹ A workshop in February 2020 brought together 40 ASNNA leaders to compile and prioritize recommendations. A writing team then integrated and provided iterative opportunities for committee members to refine the recommendations. Finally, representatives from the Social Marketing, Advocacy, and State Agency membership of ASNNA reviewed and advised on the recommendations. The writing team also considered policy recommendations of authoritative organizations²²⁻²⁷ and of the USDA-funded project, *SNAP-Ed Data Improvement: Agenda and Action Plan*.²⁸ In response to the COVID-19 pandemic and increased nationwide racial justice conversations, recommendations in the position paper were reviewed to assure that they lift up principles and practices that are innovative, inclusive, equitable, and socially just.



PUBLICLY AVAILABLE ANNUAL STATE REPORT

THE NEW REQUIREMENT:

Each State Agency that delivers SNAP-Ed must submit an annual report that shall be made publicly available by the Secretary. It shall include a description of each project, an analysis of impacts and outcomes of each project, the status of any multi-year projects, and the use of funds for administrative costs in eight categories.

Key Recommendation 1:

States and FNS should work together to establish an electronic template for a concise state report that provides prompt public availability, compliance with the Americans with Disabilities Act (ADA)/508 requirements,²⁹ infographics (maps, tables, brands, icons, photos, anecdotes), and text fields that limit the length of narrative content. The format and organization of the template should be standardized in a way that enables the reader to quickly locate information of interest and find similar information in the same place and presented in a similar fashion across states. It should be suitable for posting on the USDA website. The content should be designed to include information that would populate a compelling, understandable, and impactful section of the new Annual Federal Report (Recommendation 2) with sections that can be retrieved from state Electronic Reporting Systems (ERS) (Recommendation 5).

Each Annual State Report would cover key information, using the *SNAP-Ed Evaluation Framework* as a guide.¹¹ It should focus on impacts and outcomes that are seen as changing people's lives and making the healthy choice the easy choice in low-resource environments. It should be designed to highlight the interplay of activities within and across community settings; show how interventions work together; and – through success stories – showcase systematic, large-scale, collaborative efforts that are emblematic of the SNAP-Ed approach.



The Annual State Report should accommodate states with any number of SIAs^A and be designed to:

- Use a template that includes indicators from the four levels of the SNAP-Ed Evaluation Framework: Individual, Environmental Settings, Sectors of Influence, and Population Results
- Display aggregable data when possible and incorporate key indicators and outcomes that may vary from state to state. Several template approaches that are in use now could guide development of the new state template³⁰⁻³²; one example is found at https://extension.usu.edu/fscreate/ou-files/2020-22-staff/2019_MPR_SWR_SNAP-Ed_Cross_Regional_Report.pdf.
- Define the term 'projects' at the state-level as clusters of interventions with common themes that reflect the integration of complementary, multi-level approaches and partnerships. This is intended to reduce the number of projects to a manageable quantity for reporting purposes without losing the richness and innovation of the multifaceted SNAP-Ed approach described in the *SNAP-Ed Evaluation Framework and Interpretive Guide*.¹¹
- To graphically demonstrate reach and partnerships, consider including a state map with each county and an overlay of Congressional districts showing locations of local agencies funded by the SIAs, the most commonly targeted sites, and/or population reach.
- Use plain language and avoid the use of jargon and specialized terms to make reports easily understandable by various audiences.
- Guide development of a new format for the required annual state plans, thus ensuring that annual planning is done with outcomes in mind and that objectives and outcomes are aligned.
- Populate relevant sections of the new Annual Federal Report, including a practical set of basic, aggregable statistics tailored to various types of projects.
- Create a compelling, understandable, and impactful section about state-level projects with process, outcome, and impact results for the most common community settings (Recommendation 2).



Projects can be defined at the state level based on clusters of interventions with common themes that reflect complementary, multi-level approaches, and partnerships.

^A In 2021, 26 states, the District of Columbia and the Territory of Guam had a single SIA while the average among the 24 other states was about 5 SIAs; 5 states had more than 8 SIAs. The *ASNNA 2021 Census of Intervention, Evaluation, and Reporting Activities Planned by SNAP-Ed Implementing Agencies*. Unpublished analysis.

Proposed Content of the Annual State Report Template



A. Background (1-2 pages) (1 per state):

- State approach and/or goals
- State needs, assets, challenges, inequities, and key demographic and health indicators of relevance to the SNAP-Ed mission
- SIA names, websites, and contact information

B. Projects, reach, outcomes, and impacts

- For states with multiple SIAs, a statewide overview of key projects, reach, outcomes, and impacts (2-3 pages)
- For all states, SIA-level summaries of projects, reach, outcomes, and impacts (maximum 10 pages per state)
 - Brief description or list of “projects” (i.e. thumbnail sketch)
 - Key behavioral and health outcomes and impacts (statewide, cross-project, and/or project-specific) drawn primarily from the SNAP-Ed Evaluation Framework
 - Coordination with EFNEP and any other nutrition education program administered by the USDA
 - Community impacts (PSE, coalitions, partnerships, etc.) also drawn primarily from the SNAP-Ed Evaluation Framework

C. Success stories (1-2 pages per SIA, maximum of 10 pages per state)

- Brief narrative highlights (with photos, graphics, testimonials, etc.) for select projects and/or approaches that are emblematic of SNAP-Ed in a given state, including cross-agency collaborations (e.g. State Nutrition Action Councils) and social marketing campaigns

D. Use of funds (1 page per state)

- The dollar value of the federal SNAP-Ed grant to the SA, including administrative costs in eight required categories; the total value of grants to SIAs; and, if appropriate, SA expenditures for contractors that provide specialized support such as evaluation, social marketing, training, or special projects

E. Appendices (optional and not part of the ADA-compliant template)

- Reports, publications, and other relevant documents deemed by the SA/SIAs to be of interest to the USDA

Rationale:

States want the major audiences for their report – Congress, in-state partners, and sub-recipients – to see attractive, short, timely, and easy-to-grasp reports that reflect the ways that SNAP-Ed tailors its programming for different state infrastructures, needs, and resources. However, SIAs conducted about 500 projects in 2016²⁰ and almost 1,000 interventions were reported in USDA's Education and Administrative Reporting System (EARS) in 2018,³³ so reporting on outcomes of every project is not feasible. The required annual state reports are already submitted to USDA electronically, but their narrative format, length, and content do not align with the new statute, nor do they easily comply with ADA/508 requirements for posting on federal websites. Therefore, a standardized template that limits the length and uses infographics to highlight key information will make it easier for diverse audiences to comprehend and locate information of interest, to draw cross-state comparisons, and to aggregate data. A review of similar USDA and Centers for Disease Control and Prevention (CDC) nutrition programs failed to identify any federal reporting system that could serve as a model for SNAP-Ed,^B so a fresh approach is needed.

The new, publicly posted Annual State Reports recommended here will illustrate accountability for achieving outcomes that are relevant to both the state and to the national SNAP-Ed effort. A format tailored for easy ADA/508 compliance will do so efficiently at lower labor and production costs.²⁹ Clear expectations about reporting will enable SAs and SIAs of all resource levels to plan ahead, collect the needed information, and compile it into statewide reports efficiently.

States implement a wide variety of projects and have different ways of measuring outcomes and impacts that are responsive to local needs, challenges, assets, and interests. Therefore, it is critical that states be involved in the process of developing, field testing, and continually improving the State Annual Report template so that it presents an accurate picture of each state's SNAP-Ed work.

Awarding grants to SIAs from different sectors – university, government, non-profit, and tribal – is a feature that distinguishes SNAP-Ed from many other nutrition assistance programs and often is not well understood as a program asset. About half the states fund multiple SIAs with different types of delivery systems that connect with diverse population segments, that offer services in different regions of the state, or that can deliver promising new approaches.^C A template that captures these strengths will showcase how SNAP-Ed reflects distinct state needs and resources, while highlighting synergies and avoiding any appearance of duplication. By so doing, SNAP-Ed is able to capitalize on the essential resources that SIAs from different sectors offer: infrastructure, reach, flexibility, and relationships. With the number of SIAs per state ranging from one to more than 10, a template approach provides for both a statewide overview and for each SIA to summarize its work. States with large numbers of SIAs may cluster results from similar types of agencies into 'projects' for reporting purposes.

^B ASNNA-conducted review of reporting systems for similar USDA and CDC programs (2020). Unpublished analysis.

^C The ASNNA 2021 *Census of Intervention, Evaluation, and Reporting Activities Planned by SNAP-Ed Implementing Agencies*. Unpublished analysis.

A standardized template also makes it possible to supply information for the new Federal Annual Report without imposing an additional burden on the states. Designing the template to feed the federal report would permit aggregation of information for project types that are common in multiple states, address statutory requirements, and illustrate SNAP-Ed's contribution to the public good. Information could be compiled for the most common SNAP-Ed settings and capture information about topical, unique, or innovative projects. Examples might include those that coordinate with SNAP Online Electronic Benefit Transfer,³⁴ Pandemic EBT,³⁵ agriculture initiatives like the Gus Schumacher Nutrition Incentives Project³⁶ and unexpected events such as COVID-19 or natural disasters.

A distinguishing strength of SNAP-Ed is its ability to capitalize on the diverse assets that SIAs offer, including infrastructure, reach, flexibility, and relationships.



ANNUAL FEDERAL REPORT

THE NEW REQUIREMENT:

The USDA Food and Nutrition Service (FNS), in consultation with the National Institute of Food and Agriculture (NIFA), must submit an annual report to the Senate and House Agriculture Committees that evaluates the level of coordination between SNAP-Ed, the Expanded Food and Nutrition Education Program (EFNEP), and any other nutrition education program administered by USDA, and on the use of funds spent on such programs, including State Agency administrative costs in eight categories.

Key Recommendation 2:

As with the Annual State Reports, the Annual Federal Report should be available to the public. This report should address statutory and GAO, and other policy concerns, namely:

- The unique impact of SNAP-Ed
 - Emphasize how the three approaches of SNAP-Ed – direct education, social marketing, and PSE change – work together to maximize and sustain results.⁵
 - Describe and illustrate how the *SNAP-Ed Evaluation Framework* promotes comprehensive, multi-level programs and strong evaluation efforts.¹¹
 - Provide key summary statistics such as reach, sites, and outcomes for selected SNAP-Ed projects.
 - Describe SNAP-Ed's contribution to FNS Key Performance Indicators.³⁷
- Coordination among nutrition education programs
 - Illustrate how SNAP-Ed, EFNEP, other USDA nutrition education efforts, and CDC programs with a similar mission work together to improve health outcomes for populations experiencing low income, such as through State Nutrition Action Councils.^{5, 7, 8, 25}
 - Describe collaborative efforts with the USDA Economic Research Service, National Institute of Food and Agriculture, the National Institutes of Health (NIH), and CDC.⁷
 - Include examples of successful, policy-relevant outcomes achieved through interagency coordination at the national and state levels.
- Progress on new requirements for an online information clearinghouse and technical assistance (Recommendations 3 and 4).
- FNS expenditures for SNAP-Ed nationwide support services specified in this statute, such as the advanced online clearinghouse, technical assistance and training, the new ERS, and other third-party contractors such as for evaluation, research, or pilot projects (Recommendations 4, 5, and 6).

- The dollar value of SNAP-Ed grants and contracts awarded by SAs to SIAs and to other contractors, in addition to reporting the eight categories of SA administrative costs (Recommendation 6).

To create the Annual Federal Report, it is recommended that relevant data and information from the publicly available Annual State Reports (Recommendation 1) feed directly into the new federal report. In other words, it is important to align the information between the state and federal reports to streamline reporting efforts as much as possible. The *SNAP-Ed Evaluation Framework* provides a useful guide to describe progress in capturing results, the value of SNAP-Ed's evaluation, and its role in nutrition and physical activity assistance efforts.¹¹

Rationale:

The new Annual Federal Report will be the single most important public-facing document that can track SNAP-Ed results. It should reflect the comprehensive, multi-level mission of SNAP-Ed, describe how the three SNAP-Ed approaches work together, and showcase its policy-relevant collective impact at the national and state levels. It must reflect concerns raised by the Office of Management and Budget (OMB)¹⁹ and the GAO, such as coordination with other federal nutrition education programs.^{7, 8, 17} It also should comply with the *Foundations for Evidence-Based Policymaking Act of 2018* (PL 115-435)³⁸ which calls for data from public programs to be made more accessible by non-federal users. It should convey the uniqueness of SNAP-Ed, its substantial impacts nationwide, and topical success stories from diverse populations and communities.

It is important to showcase the degree to which federal SNAP-Ed funds support diverse SIAs across the country, thereby creating a national infrastructure that fosters large-scale, cooperative work in communities with large proportions of residents experiencing low income.



ONLINE INFORMATION CLEARINGHOUSE

THE NEW REQUIREMENT:

USDA must establish an online clearinghouse with best practices for planning, implementing, and evaluating services appropriate to the SNAP-Ed target populations and make it widely available to State and local agencies, universities, and community organizations.

Key Recommendation 3:

Design an advanced online clearinghouse, based on the expressed needs of SNAP-Ed and similar practitioners, that increases access to and the usability of data about populations experiencing low income and by using federal and other sources in accord with the *Federal Evidence Act* and its *2020 Action Plan*.^{38, 39}

The advanced online clearinghouse should:

- Continue to update and align the two existing electronic clearinghouse sites – *SNAP-Ed Connection* and *SNAP-Ed Toolkit: Obesity Prevention Interventions and Evaluation Framework*^{11, 12} – with enhanced content, search features, and inter-connectivity. Regularly post state outcome and impact reports and newly published peer-reviewed journal articles.
- Provide a central source for population and system demographics that support planning and evaluation by agencies of all types at the national, state, tribal, and county levels. Increase efficiency by linking with other data sets so that the best available statistics for the 51 *SNAP-Ed Evaluation Framework* outcomes at the Individual, Environmental Settings, Sectors of Influence, and Population Results levels are easily available to users from diverse organizations. Work with the states as practice and science advance to maintain the *SNAP-Ed Evaluation Framework* as a living document.
- Include data on social determinants of health to support the SNAP-Ed mission.^{40, 41} This includes disaggregation of relevant social determinants by income, poverty level, age, race/ethnicity, education, occupational categories, and community safety. Ensure that data required for SNAP-Ed targeting of low-resource intervention sites and geographic areas are readily available as lists, dashboards, scales, or maps for locations including, but not limited to, schools, day care and early childhood education centers, afterschool programs, food retailers/grocery stores, census tracts, food deserts, parks, and open space.

- Update the clearinghouse regularly with information about population segments and geographic areas that are not low-income to allow comparisons with SNAP-Ed characteristics and tracking trends over time.

Rationale:

SNAP-Ed practitioners need ready access to the most current and often-specialized information sources for planning, implementing, and evaluating their multi-level programs. Excellence in SNAP-Ed programming requires access to a large body of emerging information tailored to low-income audiences and low-resource settings well beyond what is available in the two current clearinghouses.

Supporting Recommendation 3a:

Establish a searchable compendium of peer-reviewed and grey literature (reports, documents, data, and other materials self-published by governmental and other authoritative sources) for SNAP-Ed outcomes using an ecological approach that includes the Individual, Environmental Settings, Sectors of Influence, and Population Results levels. Identify, annotate, and enter results of evaluation and research studies into the new site. Include a synthesis of all impact and outcome studies reported by SIAs in their Annual State Reports to ensure equitable access to information and to maximize program funding.

Rationale:

Since its inception, SNAP-Ed has been an incubator that develops, tests, evaluates, and reports on innovative approaches to direct education, PSE changes, social marketing, and multi-sector initiatives. While several dozen evaluation reports have been published in the peer-reviewed literature,^{13, 14, 42-82} most of the know-how generated by SNAP-Ed is not readily available to the public. For example, although SIAs reported over 1,000 formative, process, outcome, and impact evaluation studies in their Annual State Reports between 2014 and 2016,²⁰ the findings have not been compiled. Similarly, results of more rigorous research on SNAP-Ed that was supported by other funds have not been collected as a sharable evidence base. Identifying large-scale, long-term approaches to improve health in underserved and disparate communities is complex, so insights learned through SNAP-Ed should be made widely available. A searchable compendium would enable practitioners to use evaluation results quickly and in advance of the lag time that is inherent to publication of formal reports or the peer-reviewed literature.

***Excellence in SNAP-Ed programming
requires access to a large body of
emerging information...well beyond
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clearinghouses.***



TECHNICAL ASSISTANCE

THE NEW REQUIREMENT:

USDA must provide technical assistance to State Agencies in developing state plans by identifying common challenges, coordinating efforts to address the challenges, collecting and disseminating information on evidence-based practices, facilitating communication between and among grantees and subgrantees, and assisting State agencies in creating or maintaining systems to compile program data.

Key Recommendation 4:

USDA, its regions, and states should work together to develop an infrastructure with robust technical assistance capacity to provide ongoing subject-matter representation and models of exemplary peer programming, especially for outcomes in the *SNAP-Ed Evaluation Framework*.¹⁰ Representatives from SAs, SIAs, designated liaisons from USDA agencies, FNS Regional Offices, CDC, National Institutes of Health, the Indian Health Service, and external experts such as those from the Nutrition and Obesity-Policy Research and Evaluation Network⁸³ and the Physical Activity Policy and Research Evaluation Network⁸⁴ should serve as subject-matter leaders and project officers for the development of technical assistance resources.

Topic areas may include, but are not limited to: conducting and aligning needs assessments with intervention planning; identifying and using surveys and reporting systems; measuring, monitoring, and evaluating the effectiveness of complex, multi-level interventions; developing synergy among intervention approaches; coordinating SNAP-Ed with other federal nutrition assistance programs; compiling multi-state reports; and attributing behavioral change, environmental changes, multi-sector outcomes, and population results to program interventions.^{13, 14} Cultural relevance and equity must be addressed across all topic areas and should integrate the latest theories, tools, and methods to understand, describe, and apply interventions that address the dimensions of disparity that influence SNAP-Ed eligible populations.

Rationale:

SIAs want to continually improve how they plan, implement, and leverage their funds to reach more people more effectively, communicate outcomes that address USDA and state priorities, and align with the *SNAP-Ed Evaluation Framework*.

Supporting Recommendation 4a:

USDA and states should assess SA and SIA training needs annually and establish a multi-component training plan that includes, but is not limited to, monthly webinars, weekly resource updates, orientation of new SNAP-Ed leaders, annual national and regional conferences, communities of practice, periodic subject-matter workshops, and consultations from subject-matter experts. The annual training plan should have multi-year, sequential objectives; be designed using formats that fit within the context of a demanding, dynamic program; and be offered at times, places, and frequencies that meet practitioners' wants and needs.^{10, 13, 14, 28}

Rationale:

Training should be responsive to emerging needs, address gaps in skills and knowledge, and align with the *SNAP-Ed Evaluation Framework*, evolving program guidance, and reporting requirements.

Supporting Recommendation 4b:

USDA and states should work together as part of the *USDA Science Blueprint*⁸⁵ to build the science for large-scale, community-based SNAP-Ed programming. Strategies may include:

- Contracting with economic experts to support the development of practical models that states can use to frame responses to questions about overall return on investment, cost effectiveness, and the social good attributable to SNAP-Ed.
- Conducting a meta-analysis, scoping, or systematic review in different categories of SNAP-Ed activity at least once every three years, as is done in many areas of public health.
- Commissioning national research projects with USDA, NIH, or foundation resources to examine essential and innovative components of the program.
- Organizing large-scale, national evaluations of SNAP-Ed using external funds, similar to the NCI review entitled, *5 a Day for Better Health Program Evaluation Report*,⁸⁶ the CDC evaluation of VERB™,⁸⁷ the CHOICES Project coordinated by Harvard University,⁸⁸ or the ecologic approach used by the Robert Wood Johnson Foundation to assess community change for active living in diverse, underserved communities.⁸⁹

These strategies should be funded at the national level, not from state allocation grants. They must be designed to consider the contextual environment, resources, and competitive conditions within which healthy food and activity choices are made in resource-constrained settings. They should identify what is working, new opportunities, and areas for improvement.



Rationale:

Dissemination and implementation science dictate a need for research to test approaches that help scale up and sustain effective, equitably delivered interventions.⁸⁹ Evaluation of real-world, multifaceted programs requires new and complex mixed-methods approaches that examine *SNAP-Ed Evaluation Framework* outcomes. While rigorous evaluation within states is encouraged in *SNAP-Ed*, additional funds for long-term and multi-state evaluations and research are needed to avoid reducing resources for program implementation. These and external studies will help to codify the evidence base, reduce unnecessary or repetitive evaluation activity, and develop consensus about interventions needed to bring program benefits to scale.

Training should be responsive to emerging needs, address gaps in skills and knowledge, and align with the *SNAP-Ed Evaluation Framework*, evolving program guidance, and reporting requirements.



ELECTRONIC REPORTING SYSTEMS FOR PROJECTS IN STATE PLANS

THE NEW REQUIREMENT:

State Agencies must describe in their state plan how they will use an electronic reporting system to measure and evaluate projects that are conducted through SNAP-Ed.

Key Recommendation 5:

States should maintain autonomy to select the customized electronic reporting systems (ERS) needed to manage state programs that also feed aggregate state information into the federal reporting system (Recommendations 1, 2, and 6). Technical and fiscal support for the state-level ERS should be provided to assure consistency, aggregability, and quality. Any required federal reporting should draw from and include key information from reports described in Recommendations 1, 2, and 6 and not require additional reporting on the part of the states.

Rationale:

States use electronic data systems for assessment, planning, implementation, evaluation, and dissemination. Since SNAP-Ed is a diverse program, it requires flexible reporting processes. States have invested in the creation and adoption of ERS that reflect the dynamic needs and diverse projects of their organization, mission, and communities. Supporting the maintenance and improvement of these existing ERS protects state innovation and investment. To minimize the burden on states, federal annual reporting requirements should align with the content of the Annual State Report template. SAs will design their ERS to feed into this template (which includes fiscal administrative expenses). These state-level reports will, in turn, provide content for the Annual Federal Report, streamlining the flow of data.

National support and technical assistance for the development and adaptation of state ERS will ensure that the data are consistent, aggregable, and reliable. USDA assistance in measuring and evaluating project reach, outcomes, and impact will improve capacity to comprehensively report on SNAP-Ed programming.

SNAP-Ed is a diverse program that requires flexible reporting systems.



ELECTRONIC REPORTING OF FISCAL ADMINISTRATIVE EXPENSES

THE NEW REQUIREMENT:

State Agencies must describe in their state plan how they will use an electronic reporting system to account for allowable State Agency administrative costs in eight specific categories: salaries and benefits, office supplies and equipment, travel, nutrition education materials, professional activities, lease or rentals, maintenance and repair, and indirect costs.

Key Recommendation 6:

Update the budget categories in the SA state plan and Annual State Report template with the eight categories required by statute and add a ninth cost category for grants and contracts. The new ninth category will display the entire award to each state, including for grants that SAs administer to SIAs and for contracts to any specialized vendors that provide statewide support such as social marketing, evaluation, or training. As with Key Recommendation 5, SAs and SIAs should maintain autonomy in their selection of ERS to report fiscal administrative expenses. Technical and fiscal support for state-level ERS should be provided to assure quality fiscal reporting.

Rationale:

To provide a complete picture of how funds are spent, the dollar value of grants for services to the public should be reported as a ninth category. This would include the dollar value of grants to the SIAs that develop, implement, and evaluate SNAP-Ed community services and to any additional contractors that the SA may engage to provide statewide support such as for evaluation, training and technical assistance, social marketing, or special projects. Aligning the Annual State Report template with the fiscal categories required by statute and designing the state-level ERS to include reliable fiscal information will ensure that requirements of the Farm Bill are met.



CONCLUSION

SNAP-Ed SIAs are committed to delivering programs that reflect state-of-the-science information, proactive technical assistance and training, dynamic evaluation, and timely public reporting. It is our hope that the recommendations in this position paper will be used to guide the implementation of the 2018 statutory requirements. ASNNA seeks to ensure that SNAP-Ed is modernized, empowered, and enabled to become a more readily available national resource that reaches more people, develops strong synergy among programs with similar missions, and is valued for its innovation, implementation know-how, responsiveness, and results.

The synergies caused by the parallel epidemics of infectious COVID-19 and non-infectious diet-related chronic diseases, including obesity, have serious national implications.^{3, 24-27} COVID-19 has strained the Nation's nutrition safety net and widened pre-existing health disparities among racial and ethnic groups, further demonstrating the importance of impactful SNAP-Ed programming.^{90, 91} Three-quarters of people killed by COVID-19 had at least one underlying condition, most of which were diet-related⁹¹ Post-COVID-19 estimates of household food insecurity were predicted to be 2.7 times higher in the spring of 2020 than in winter, rising from 8.7% in February to 23.0% by April/May of 2020.⁹² For households with children, rates are estimated at 29.5%, with prevalence in African American and Hispanic households even higher.⁹² These adverse impacts have both short- and long-term implications for the populations that SNAP-Ed serves.

Experts call for unified, urgent bipartisan action that will result in enduring, equitable, systemic changes.⁹¹ Among the recommended priorities are more integrated public and private safety net programs – namely government and private-sector food banks, food companies, and health care entities – reinvigorated regional food systems and local food chains that serve all communities, and support for state and local food policy councils.⁹¹ The SNAP-Ed focus on individuals, environments, systems, and public/private partnerships supports such approaches to strategic recovery, while also strengthening community resilience and public health capacity. Efforts to strengthen SNAP-Ed, in alignment with statutory requirements and as described herein, are critical and timely.



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The Association of SNAP Nutrition Education Administrators (ASNNA) is a non-profit professional organization whose members administer, implement, and evaluate state SNAP-Ed programs. ASNNA wishes to acknowledge with appreciation the Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed) administered by the USDA Food and Nutrition Service which helps support the personnel who prepared this paper. The contents of this publication do not necessarily reflect the view or policies of the USDA.

Suggested Citation: *Recommendations for Implementing the SNAP-Ed Provisions of the 2018 Farm Bill: A Position Paper* (December 2020). Association of SNAP Nutrition Education Administrators (ASNNA), Virginia Beach, VA. © 2020.

SNAP-Ed is a grant program funded through the Supplemental Nutrition Assistance Program (SNAP) of the USDA, an equal opportunity provider.

