ASNNA Response to Notice of Public Comments
Office of Management and Budget ICR Reference Number 202211-0584-007
National Program Evaluation and Reporting System (N-PEARS)
April 6, 2023

The Association of SNAP Nutrition Education Administrators (ASNNA) is committed to continually strengthening the SNAP-Ed Program to better serve the estimated 90 million people who are income-eligible. This letter, developed by a collaboration of members from multiple states and regions, is a response from ASNNA to the second public comment period regarding N-PEARS and follows up on comments sent in August 2022. During the 60-day comment period in 2022, ASNNA provided feedback on various topics that ASNNA believed were critical for inclusion in the final N-PEARS e-system (See Enclosure 1, 2022 public comments). In this letter, we will review SNAP-Ed's commitment to an e-system of planning and reporting, and provide a summary response to each of the four questions asked in the OMB release. We conclude with recommendations for next steps to ensure this e-system meets the requirements of the 2018 Farm Bill while meeting the needs for planning, reporting, and evaluation of SNAP-Ed programs.

The necessity of an e-system for SNAP-Ed

ASNNA is invested in seeing a robust e-system for SNAP-Ed planning and reporting. Given the public investment in SNAP-Ed and the vulnerable population it serves, it is crucial that the N-PEARS system be successful. SNAP-Ed is the country's largest, most flexible, diverse, and responsive community nutrition education and promotion program, and it focuses exclusively on low-resource communities where disparities are high. As such, SNAP-Ed is key to achieving the country's new 2030 goals for food and nutrition security. SNAP-Ed strives to provide evidence-based and comprehensive programming to its participants through a diverse, multi-level public health approach combining direct education; policy, systems, and environmental change; social marketing; and partnerships at all levels.

An e-system for SNAP-Ed reporting and planning can elevate the work SNAP-Ed does and assist in showing nation-wide impacts and outcomes. The need for a functional, advanced reporting system is critical, however, the current review of the OMB package indicates that the N-PEARS system is not there yet. ASNNA's top concerns from this 30-day review period include: lack of field or pilot testing of the system, increased workload burdens, possible data inaccuracies, expected workload capacities, and lack of transparency around the purpose of the data being collected and how it will be used to represent SNAP-Ed outcomes.

Given these concerns, ASNNA offers considerations and recommendations per the four specific questions in the OMB call for public comment.

1. **Is N-PEARS collecting information that is necessary for the proper performance of SNAP-Ed, and does the information have practical utility?**

   During the review of the OMB package, members of this team of experts reviewed each section of the N-PEARS plan and report. While there are sections of both that are essential for the performance of SNAP-Ed, there are several sections that appear to lack necessity and practical utility. Concerns related to necessity and practical utility include: the planning and reporting of site-level data points; the definition of programs and the resulting usage of it in planning and reporting; and the usability of the outputs of N-PEARS.

   First, regarding the site-level data points, the many data points requested in the State Plan and Annual Report seem excessive and beyond the scope of the program's impacts and outcomes. The practical utility of these data points is not apparent given that no dashboard or reporting outputs have been incorporated yet, even though the reporting of outcomes is one of the key reasons to develop this system. To address this concern, ASNNA recommends more transparency about a plan, timelines, or staffing within USDA to receive, manage, and work with users to interpret the data.

   Second, the broad definition of a project in N-PEARS poses a challenge to aggregating data from a system and the ability to tell the SNAP-Ed story to Congress. Because of the broad definition, states may choose to define projects in a variety of ways, leading to outcome data that cannot be compared nationally. Building on this concern is the requirement to plan and report by project. The detailed fiscal breakdown of all program elements, including costs by project, does not align with real-world implementation. State plans are written up to eight 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 these costs and program elements that are proposed to be tracked do not enhance program performance or efficiency. Regarding this concern, ASNNA suggests re-considering the definition of project to provide more guidance for states as well as re-evaluating the necessity of budgeting by project, given the operational parameters of SNAP-Ed programs.

   Third, regarding the usability of outputs from N-PEARS, it is unclear whether states/SIAs would receive reports from this data system or if the reports generated would provide the information necessary for state purpose. The lack of outputs or useful reports would necessitate states needing duplicate efforts by generating their own data and reports separately for use with partners and other stakeholders, as well as to show compliance with Congressional mandates to provide info on outcomes and impacts. To address this concern, ASNNA suggests real-time generated reports for all FNS practitioners and programming partners including SAs and SIAs, regional offices, and the national nutrition education branch within FNS.

2. **Is the agency's estimate of burden accurate, including validity of the methodology and assumptions used?**

    Review of the OMB package to address this question was challenging, as it was unclear what work was counted towards the burden of time estimate. Originally, it was unclear if the burden estimates were for all the time and effort needed for N-PEARS. Therefore, ASNNA used Appendix H to excerpt the number of minutes for each section of the plan and report for each of the 4 state groups **(See Enclosure 3, ICR Time Review Tool)**. Since some functions had minimal time allocations, such as 30 seconds or 5 minutes, ASNNA concluded that the estimates were solely for data entry in N-PEARS, once the information was already gathered and compiled into formats that could be entered electronically.

    Given this assumption, ASNNA reviewed the workload estimates, salaries, and burden of data entry and concluded that the estimates were generally low, specifically the proportion of time required. Similarly, pay scales are low and do not show that specialized scientific, social marketing, and evaluation personnel are needed. Thus, the stated burden significantly under-estimates the time and costs needed to collect and prepare data for electronic entry, or of re-entering data from other sources.

    In addition, much of the information being collected, while not new, requires re-packaging and input into the system. The FNS burden estimates do not include time needed to reconstruct existing in-state systems, develop documentation, pilot test, train all staff and local grantees on new procedures, and verify quality of reporting before submission to USDA.

    Additional issues include: little information on auto-population for the needs assessment portion of the State Plan; secondary data sources rarely coincide with SNAP-Ed intervention periods; and specific information on SNAP-Ed subpopulations, specific geographic areas or organizational types where SNAP-Ed may be delivered is rarely available.

    Given these concerns, ASNNA would be willing to assist in and recommend conducting a cost burden analysis, to ensure the value of this system is identified and provided at a reasonable workload. Such an analysis would consider the concerns related to auto-population of data, secondary data sources, and data availability in addition to insights into who is conducting the work and appropriate pay scales related to those expertise.

3. **What are ways to enhance the quality, utility and clarity of the information that will be collected?**

    Per our review, there are opportunities for enhancing the quality, utility, and clarity of the information collected in N-PEARS. ASNNA recognizes that data collection and proper statistical analysis are vital to ensuring that SNAP-Ed agencies report quality information in the system. The data gathered for N-PEARS should include collecting data useful for program evaluation, supporting intervention evidence base, promoting SNAP-Ed, providing accountability for funds

used, and sharing the stories of SNAP-Ed impact while avoiding overburdening program administrators and participants is essential. Additionally, the reports provided by the new reporting system must be able to present data so all intended audiences, with varying statistical literacy levels, understand the data and SNAP-Ed's story is captured.

Given these needs, ASNNA has several concerns related to data quality, utility, and clarity. First, SNAP-Ed reporting has emphasized the importance of qualitative data to provide context and clarity that complements quantitative data points. Qualitative data is well recognized as a more inclusive way to gather information from SNAP-Ed participants and partners. Therefore, ASNNA recommends that the N-PEARS system provides space for this critical type of data that does not require the dissection of qualitative data into various success story sections, and that does not necessitate the end-user taking additional steps to access it, such as reading a separate attachment.

Second, ASNNA recognizes that the need for data that can be aggregated nation-wide is critical to showcase the impact of SNAP-Ed. However, the benchmarking of individual behavior change outcomes is concerning for two reasons. First, benchmarking to standard outcomes rather than looking at positive changes in any capacity tells a different story about SNAP-Ed, and one that may fall short of showing the complete impact of programming. Second, benchmarking individual behavior changes to standards creates concerns related to equity and appropriateness for the income-limited audience. Benchmarks create a lack of sensitivity for the SNAP-Ed audience when populations that have adequate resources struggle to make behavior changes to these same standards. Given these concerns, we would recommend considering ways to collect aggregatable data while honoring the true impact of SNAP-Ed and remaining sensitive to the realities of its audience.

Third, the N-PEARS system provides opportunities for reporting on outcomes that most states may be able to address, but it does not allow for more rigorous analysis for states that have that capacity. Understandably, requiring all states to provide this higher-level data analysis is not equitable. However, for those agencies with expertise and systems in place, providing meaningful opportunities to provide this data is strongly encouraged and could potentially be an advisory council to this system as it advances.

Additional concerns include: updating the metrics of *Framework* indicators; analysis and uploading of qualitative information; continuous improvement workgroups made up of federal and state experts; consistent multi-state meetings; updating metrics available from secondary data sets; and collaboratively exploring various statistical phenomena such as ceiling effect in reporting outcome data and concerns about cut points.

FNS has gathered and provided support through the contractor, Insight Policy Research, Inc. (Insight), regarding data quality, utility, and clarity. Appendix C1 (June 2020) reprises work with potential users and puts recommendations for reporting on into an Action Plan 1.0 that addresses 5 types of data: reach; sites and settings; partnerships and coalitions; PSE changes; and individual behavior change. Appendix C2 (October 2021) proposes an Action Plan 2.0 which takes the next step – to propose a vision for reporting forms that supports USDA's vision and

recommend specific near-term and longer-term tasks. As FNS works with Insight and other contractors, ASNNA suggests building on and engaging with the extensive expertise that ASNNA, State Agencies (SAs), and State Implementing Agencies (SIAs) can provide. For example, formalizing an inclusive and transparent advisory group that can establish regular feedback loops and identify issues in advance can help FNS assist FNS in strategies that maximize resources. Working together, from the Nutrition Education Branch and FNS Regional Coordinators to the SAs and SIAs, SNAP-Ed can have a reporting system that provides high-quality data that effectively shares the story of SNAP-Ed and its inspiring participants.

4. **What are ways to minimize the respondent burden of collecting information, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology?**

After our review of the package, ASNNA offers the following recommendations for minimizing burden related to overall system access and efficiency, as well as specific recommendations for the needs assessment and budgets sections.

Access & Efficiency: In our review, ASNNA identified several areas where access and efficiency could be improved as related to burden including the access levels to sections of the system, auto-population of data, carrying-over of data, and site-specific data reporting.

First, in the State Plan, ASNNA recommends removing the requirement that SAs must first grant access privileges to SIAs to work on the needs assessment and action plan sections. Instead, it is more effective to communicate directly with both SAs and SIAs and provide simultaneous access to these sections to all SIAs along with the SA. This would help decrease bottlenecks in the system and increase the flow of work, reducing the overall burden of data entry.

Second, the N-PEARS system appears to allow for file uploads into various sections of the plan and the report. This has the potential to significantly decrease burden. To further these efforts, ASNNA suggests developing additional systems for direct file uploads and allowing for more file uploads to auto-populate sections of the plan and report. Additionally, allowing for data sharing between N-PEARS and existing data sources would reduce human error when re-entering existing data into N-PEARS. This is particularly relevant when considering the significant amount of information from community service sites/locations, budgets, and personnel that must be uploaded from program sources and for providing documentation on intervention evidence. A separate location in the system where all intervention evidence can be uploaded once via a database upload would help decrease the burden of providing this information.

Third, similar to the benefit of uploads is consideration for how information will carry from plan to report to the next plan. In the current N-PEARS review, it appears that data will flow from the plan to the report, however it is unclear if data from the report will flow into the next year's plan. ASNNA recommends ensuring that data that is updated in one year's report will carry over to the next year's report and so forth to decrease the burden of re-entering data in multiple places.

Fourth, ASNNA recommends reconsidering the necessity of reporting detailed site-specific data in order to reduce the burden. It is estimated that there are at least 60,000 community locations where SNAP-Ed is delivered each year, and N-PEARS requires detailed information for activities at every single address. Similarly, in 2021 there were over 35,000 partnerships, and N-PEARS requires that names, contacts, locations, and contributions be entered for each one. This is a massive amount of new information to obtain and data to enter, the purpose of which is unclear. Since the statutory charge is to report outcomes and impacts of projects that each are delivered in multiple individual sites with multiple PSE changes and multiple partners, dividing into thousands of individual parts does not make for practical reporting. As such, ASNNA recommends dropping the requirement for each specific location/site data. If the goal is to have totals for a given project, ask for the totals instead of the specific locations because site specific reporting discourages comprehensive, community-wide work. Initially, for all specific and summative reporting, provide a database upload system for required components.

Needs Assessment: Needs assessments serve a critical role in the planning process to identify the needs in communities and ensure necessary services are provided in a culturally relevant way. ASNNA recognizes that for unique programming to continue to meet the needs of states and communities, it is essential for the needs assessment to be comprehensive and flexible. With regards to burden, ASNNA noted two primary areas of concern in the needs assessment section.

First, there is concern that the needs assessment requires data collection on information that is not practical for the state's programming, such as elaborate profiles by age, race/ethnicity, and language. Along with the practicality of the data is the concern that some requested data is not available in some states and how best to handle these sections of the assessment.

Second, there is concern that the current data collection requirements include phenomena that SNAP-Ed cannot influence, such as disease rates for diabetes, heart disease, or cancer. Based on the inclusion of these data points in the needs assessment, there is concern that the needs assessment will serve as a baseline for evaluating a state's SNAP-Ed performance, yet some of the data points included are far too complex for SNAP-Ed to address alone.

Given the current requirements of the needs assessment in N-PEARS, ASNNA suggests that this section be adjusted to allow for both comprehensive and flexible assessment based on the capacity, available data, and resources of each state. To do so, it may be useful to make sections of the needs assessment optional in order to reflect each community. To do so, needs assessments should focus on characteristics for which data are typically available at sub-state levels, in time periods (annually, biennially), sensitive to change in sub-state areas, and are known to influence SNAP-Ed programs and outcomes. The needs assessment should include factors that SNAP-Ed can consider in allocating resources or that it can increase, such as community support, partnerships, and leadership for healthy eating and physical activity. Meaningful factors that could be considered in the needs assessment include SNAP benefit levels, participation in nutrition assistance programs, local unemployment, health care

availability, and community and human assets that factor in choosing program locations and in expecting positive outcomes.

Project Budgets: ASNNA is asking that FNS drop the new requirement for budgets-by-project necessitating separate personnel allocation by project in State Plans and Annual Reports. As is written, N-PEARS would require that, in addition to the SIA's total budget and staff list, every 'project' have a separate sub-budget and personnel allocation. There is no explanation of why this information is needed in this way or how it would be used. Since projects often work toward larger goals, they are designed to be interrelated and complementary, sharing both staff and supplies. Additionally, since SNAP-Ed is comprehensive and responsive, its projects can work responsively with localities as changing conditions, wants, and needs warrant throughout the year. The necessity of budgeting by project exceeds statutory requirements and has no practical use to states. The 2018 Farm Bill required reporting on project outcomes and impacts and on the administrative costs of SNAP-Ed in each state, but it did not require separate costs for each project. SAs have always assured that all SIA expenditures and job descriptions are for allowable activities only. Due to the burden of budgeting this way, ASNNA recommends dropping this requirement until the current definition of project is thoroughly defined and the utility of budgeting by project is more closely examined.

Onboarding Process: ASNNA requests a partnership with FNS to field test the operability of the new FY 2024 State Plan and FY 2023 Annual Report systems before their respective releases to the field. The purposes are to identify and immediately repair any data entry and operability glitches and assess the degree to which the planned pre-population of information, either from in-state sources or the rolling forward of information between the State Plan and Annual Report, successfully transfers. This field testing will help to prevent wasted effort and reduce respondent burden.

Additional Overall Recommendations:
- Field or pilot testing has not been done on a large scale, and there is a need for additional input from SNAP-Ed practitioners and community members. Below are essential steps that ASNNA recommends for an e-system that will assure it is designed with all contributors in mind – SIAs, SAs and FNS – can be implemented by users, and will have the intended results.
- ASNNA recommends providing SAs and SIAs with a timeline to conduct pilot testing of selected components of N-PEARS ahead of the Farm Bill 2023 or 2024. This testing initiative would facilitate SNAP-Ed agencies in collaborating with FNS to identify the strengths and weaknesses of the suggested forms.
- Limit data collection in the State Plan and Annual Report to that which is needed for program operations or that is required by statute, especially in the first several years, as improvements are being made.
- ASNNA recommends that FNS use the feedback that ASNNA and others provided in this Public Comment process and work in partnership with ASNNA to identify more completely those areas of data collection that require immediate clarification. For longer term improvements in the system that minimize the burden of data collection, working

together with ASNNA to develop state-specific databases/maps that correspond with outcomes in the *SNAP-Ed Framework* and that can show change within 1-3 time periods corresponding to SNAP-Ed implementation periods. Provide these by (1) geographic units in which SNAP-Ed programs are delivered: census tract, zip code, county, city, Congressional District, media markets/metropolitan service Areas, as well as statewide; (2) SNAP-Ed eligible institutions (such as schools, grocery stores, parks, churches, early childhood education sites, farmers' markets, health centers); and (3) high-need areas such as food deserts and food swamps.

- Inclusive workgroups of practitioners, similar to those used in other parts of USDA, should be formed in 2023 to resolve ongoing issues with the system and also to prepare for the first revision of N-PEARS. The purposes are to have an organized and transparent system for systematically collecting user feedback, working with FNS contractors to make changes promptly, and stockpiling changes that require more substantial modifications in the N-PEARS for FY 2025 and beyond.

SNAP-Ed evaluation is currently strong. Positive behavior changes are continually shared through our annual reporting and through refereed journals and publications, with the SNAP-Ed Connection having over 113 peer-reviewed articles in the system. SNAP-Ed practitioners, ASNNA members, value the promise of a reporting system which will allow equitable communication about the effectiveness of SNAP-Ed to all stakeholders. A national reporting system must build on that strength. ASNNA commits to participating in a system of continuous improvement of the currently proposed beta system such that the goals of engaged legislators, agencies, practitioners, and, most importantly, program participants, are achieved. SNAP-Ed works.

Respectfully,

ASNNA membership as represented by:

ASNNA Leadership Team

Advocacy Committee

Evaluation Committee

Race, Health and Social Justice Committee

Social Marketing Committee

Enclosures:

1. ASNNA Letter of Public Comments to the *Federal Register* on N-PEARS (August 9, 2022)

2. ASNNA Position Paper entitled: *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 (December, 2020)

3. ASNNA Feedback Tool: ICR Time Estimates for N-PEARS Data Entry (April 2023)

4. ASNNA Consolidated Review Tool for N-PEARS Comments to OMB (April 2023)