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Aurora Calvillo Buffington  
Food and Nutrition Service  
Supplemental Nutrition Assistance Program  
Program Administration and Nutrition Division  
1320 Braddock Place, 5th Floor, Alexandria, VA 22314

Dear Dr. Buffington:

The Association of SNAP Nutrition Education Administrators (ASNNA) appreciates the opportunity to respond to the call for public comment on the proposed Agency Information Collection Activities: Proposed Collection; Comment Request-Supplemental Nutrition Assistance Program Education (SNAP-Ed) Intervention Submission Form and Scoring Tool.

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 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 177 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 SNAP-Ed to better serve the estimated 90 million people that SNAP-Ed is intended to help. Formed 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.

ASNNA projects that also inform our comments about the FNS-885 (Scoring Tool) and FNS 886 (Submission Form) include:

- Soliciting submissions and helping to develop scoring criteria for successive editions of *SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States (Toolkit)*, starting in 2014 when it had only 35 entries through 2021.

- Developing and implementing the comprehensive, multi-level *SNAP-Ed Evaluation Framework (Framework)* and its companion *Interpretive Guide* (2016), reported in a peer-reviewed paper.
- Conducting biennial censuses tracking use of the *SNAP-Ed Framework* and needs for peer support and technical assistance, starting in 2017, reported in 2 peer reviewed papers.
- Conducting the *2018 Profile of Social Marketing Campaigns*.
- Compiling ASNNA's 2020 position paper, *Recommendations for Implementing the Nutrition Education and Obesity Prevent Grant Program (SNAP-Ed) Provisions of the 2018 Farm Bill*, with practitioner needs for the newly required online information clearinghouse and for USDA technical assistance.
- A review of *Toolkit* entries against the 51 outcomes in the *SNAP-Ed Framework* and the *2022 National Strategy for Hunger, Nutrition, and Health (National Strategy)*.
- The 2023 position paper, *A Roadmap to Equity in SNAP-Ed (2023)*.

Four ASNNA Committees – Evaluation, Advocacy, Social Marketing, and Race, Health, and Social Equity – collaborated to bring their expertise and experience with the *Toolkit* into these comments. To make a judgment about changes proposed in the Federal Register, they also examined content in the source forms, FNS-885 and FNS-886.

We commend USDA's effort to upgrade the *Toolkit* and improve users' experiences by simplifying the Submission Form, updating the scoring criteria, and asking for information that aligns with the new N-PEARS reporting system. As with all SNAP-Ed materials, we heartily agree that the *Toolkit* should be updated frequently in order to stay responsive to users' needs, incorporate new practices, and help the country reach its goals for food and nutrition security.

Summarizing the detailed review that follows, ASNNA has identified ways for USDA to modify *Toolkit* submissions and scoring criteria for greater flexibility, innovation and impact. It is essential that SNAP-Ed interventions, approaches, and strategies spur growth by encouraging the inclusion of multi-level interventions, interventions that span the evidence-base continuum (i.e. research-tested to emerging) and those with policy implications. The recommendations that follow are intended to lay the groundwork for further strengthening SNAP-Ed. Ultimately, we are looking for the *Toolkit* to become a compendium of practical, real-world interventions, approaches, and strategies that are impactful in a diversity of settings and communities. In addition, more systematic incorporation of outcomes in the *SNAP-Ed Framework* and reference to the *National Strategy* will align with SNAP-Ed practice and increase efficiency for *Toolkit* users. Our comments, based on the proposed changes in the Federal Register and on our review of the source documents, follow:

### **Section-Specific Comments about the Proposed Changes**

#### **FNS-886 Intervention Submission Form (Expires 09-30-2024)**

**1. Restructuring, formatting, and wording edits to all sections.**

*ASNNA Response:* As outlined below, it is sometimes unclear what restructuring, formatting, new questions, and wording edits are being suggested. However, the proposed 2024 revisions, with recommendations from ASNNA, will help USDA and grantees improve the information that is being collected, and ultimately minimize the burden involved with preparing and scoring submissions to the *Toolkit*. In addition, more systematic use of outcomes in the *SNAP-Ed Framework* and reference to the *National Strategy* will align with SNAP-Ed practice and increase efficiency for *Toolkit* users.

**2. In Section I, Intervention Name and Contact Information, move three questions related to costs and materials to Section VI, Training, Materials, and Resources.**

*ASNNA Response:* We agree with moving the three questions related to costs and materials to Section VI, Implementation. We also think it is important for the ongoing costs of required collateral materials (e.g., handouts that need to be printed, supplies, incentive items) to be acknowledged in the form.

**3. In Section II, Intervention Overview, remove “Breastfeeding” and “Food Insecurity” and add “Food Resource Behaviors” as a Target Behavior category, remove four questions on evaluation and evidence base, and add a question on the core intervention components.**

*ASNNA Response:* In Q14, **Intervention Approaches/Types**, we strongly recommend adding **multi-sector partnerships**, which may use any combination of approaches, including at the population-level.

In Q 14, **Target Behaviors**, we agree with adding “food resource behaviors” but think food assistance use should be kept as it is a distinct behavior. The availability and use of food assistance programs that benefit eligible persons and support food security is an essential behavior and resource, and a key SNAP-Ed outcome for individuals and communities.

Further, we recommend requiring the specification of both primary and secondary foci (outcomes for which change was tracked) for a given program to improve the search functionality of the *Toolkit*, especially outcomes in the *Framework*. Without such a designation, the undifferentiated checklist of Target Behaviors encourages the selection of multiple or all of the behaviors, resulting in decreased functionality of the search function within the *Toolkit* system when a given intervention is tagged with all of the possible target behaviors.

In Q15 and 16, **Evidence-Based approaches**, it is unclear what is meant by proposing to remove the 4 questions on evaluation and evidence base. If ‘removing’ is intended to drop Q15 and Q16, we support replacing them with core intervention components (DE, PSE, SM) and showcasing effective approaches in the environmental, multi-sector, and population spheres of

influence for diverse populations, communities, and rural areas. Assuming that 'core intervention components' means moving Q35 into Section II, then we recommend maintaining the open text format of Q35 to allow for descriptive information.

However, it is unclear if there is a proposal simply to drop the category of 'emerging' in Q15 as is stated in proposed changes to the Scoring Tool (See Item 3, below) or to replace the term 'emerging'. If Q15 is retained, then 'emerging' is critical as a third category of evidence. 'Emerging' reflects the dynamic, responsive, interdisciplinary and innovative nature of working with partners and communities. This allow SNAP-Ed IAs to address working with many different outcomes in the SNAP-Ed Framework, with long-standing SNAP-Ed policy, and with activity recommended in the *National Strategy on Hunger, Nutrition, and Health*. We recommend updating the term, 'emerging evidence' as 'having the potential for increasing food and nutrition security, physical activity, and community health, including obesity prevention.' This would allow for promising interventions with evaluation in early stages with final results pending.

We support dropping the checklist in Q16, types of evaluation, because it is incomplete and not needed for scoring purposes. In practice, evaluation methods evolve, are drawn from many disciplines, and often require a synthesis among multiple methods, making a static checklist problematic.

In Q20 and 21, we recommend dropping the term 'target audience' and using more inclusive terms, such as 'intended groups, settings, or communities', and aligning the categories with those in N-PEARS or the U.S. Census.

#### **4. In Section III, Intervention Development, re-number questions due to the insertion of new questions in Section II.**

*ASNNA Response:* Section III of the Submission Form is titled **Reach**, and questions 19-21 ask for information about the groups and location types for which the submission is intended. Therefore, we recommend retaining 'reach', the current title, when FNS-886 is updated.

We agree with renumbering the questions. Race and other 'reach' categories should be expanded and updated to be more inclusive, and the language in this section (and throughout) should match the data required and language in N-PEARS. We recommend updating Q 20 which does not line up with N-PEARS categorizations. Instead of using the term "target audiences" in the Forms, we recommend using terms such as "priority populations or intended communities" which is non-violent, inclusive, and respectful. In the 'other' category, we recommend listing 'unsheltered or unhoused people (instead of 'homeless'), migrants/refugees, and veterans.'

#### **5. In Section IV, Evaluation and Outcomes, add a new question asking submitters to identify tools they used to evaluate their intervention, simplify a question on which**

**outcomes the intervention achieved, and increase the character limit on a question about evidence findings included in the submission. Update section for readability and renumbering to reflect the newly inserted questions.**

*ASNNA Response:* In the Federal Register, Section IV is titled Evaluation and Outcomes, but the current submission form titles Questions 22-28 as **Effectiveness**. We recommend that the existing title, Effectiveness, be retained.

We agree with Q23 asking for evaluation tools to be identified for inclusion within the Toolkit. This would help potential users easily locate appropriate pre-developed evaluation tools.

In Q25 (intended outcomes), we recommend clarifying “extent achieved” by providing examples of complex activities, approaches and strategies, such as multi-sector interventions, partner engagement, or population-wide changes. We strongly recommend providing additional examples of “intended outcomes” beyond those in the USDA’s 7 priority indicators, asking for outcome metrics including but not limited to those in the *Framework’s 2017 Interpretive Guide*. It is also essential to include qualitative outcomes and reduce the focus on statistical significance. Currently, the 10 points for a high score in the Scoring Tool, FNS-885, favors statistical changes over real-world importance or practicality. A focus on quantitative, especially statistical over real world significance, could potentially discriminate against complex and innovative submissions and those from agencies with fewer evaluation resources.

**6. In Section V, Implementation, renumber to reflect newly inserted questions.**

*ASNNA Response:* In the Federal Register, Section V appears to be mis-titled as Implementation, but in the current Submission Form titles Questions 29-34 as **Adoption**, a construct of the RE-AIM model. We recommend retaining the current title which is ‘adoption’ and aligning the terminology in questions 29 and 32 with N-PEARS.

**7. In Section VI, Training, Materials, and Resources, clarify training that is required to implement the intervention, and renumber to reflect newly inserted questions.**

*ASNNA Response:* In the Federal Register, Section VI is labeled as Training, Materials, and Resources, but the current Submission Form titles Questions 35-37 as **Implementation**, a construct of the RE-AIM model. We recommend retaining the current label of Section VII as ‘implementation’ when FNS-886 is updated. We agree with moving questions about costs and materials from Section I and agree with renumbering the questions.

**8. In Section VII, Intervention Attachments, add instructions to clarify that submitters should describe how evaluation and modification addressed intervention sustainability concerns, and renumber to reflect newly inserted questions.**

*ASNNA Response:* This title is confusing. In the Federal Register, Section VII is referred to as ‘Intervention Attachments’, while the description in the existing Submission Form cites modification and sustainability, essential activities of **Maintenance** in the RE-AIM model used

by SNAP-Ed. Questions 38-43 in the current Submission Form also ask about maintenance activities. We recommend retaining the current label of Section VII as ‘maintenance’ when FNS-886 is updated.

There appears to be a misalignment between information about ‘adoption’ asked in the Submission Form and that in the Scoring Tool. Q41 in FNS-886 asks about how process evaluation informed development of the intervention that was submitted, while the Scoring Tool asks whether its components can be adapted to other settings or communities. We recommend that Q41 be modified to ask about the feasibility of adapting to other settings/communities than those in which the intervention was developed or to describe any adaptations or modifications made to the intervention over time. Include modifications made to move interventions from pilot projects to full scale, or to make adaptations for changes in conditions such as partner/setting input, policy priorities, updated standards, or changes to available resources (personnel, economic conditions, etc.). and drop process evaluation that is not part of the Scoring Tool, FNS-885. We believe it is essential to allow space in the Toolkit for interventions that are setting specific.

We agree with asking for the submission of intervention materials, as these are very helpful to others.

**9. In Section VIII, Evaluation Attachments, add instructions to help submitters name and reference their attachments throughout the submission form.**

*ASNNA Response:* We agree with the proposed changes.

**FNS-885 Intervention Scoring Tool (Expires 09-30-2024)**

**1. Rename and restructure all sections to align with the changes to FNS–886, the SNAP-Ed Intervention Submission Form.**

*ASNNA Response:* We agree with renaming and restructuring all sections to align with the changes to FNS-886. We also recommend aligning the content of both forms with N-PEARS.

**2. In Section I, Intervention Overview and Development, add three questions on (1) the intervention’s ability to address the needs of the target population, (2) the target population and community partner involvement in the intervention development, and (3) SNAP-Ed educators, target population, and/or partner involvement in testing the acceptability of the intervention.**

*ASNNA Response:* The content of Federal Register Section I aligns with the RE-AIM construct titled ‘reach’ in the existing Scoring Tool, FNS-885. We agree with adding the three questions and note that this will require modification of factors listed in the existing Scoring Tool. Again, we recommend moving away from ‘target audience’ terminology to another, more inclusive term like “intended groups, settings or communities.”

Among the scoring factors we strongly advise including points for reaching smaller, chronically under-served groups and settings as well as those with a high reach. High reach can be an equity barrier to creating targeted programming for specific communities, especially marginalized groups or those in geographic areas with smaller numbers. It can exclude new and promising community-based approaches that may not yet reach large numbers of people, organizations, or geographic areas. It would disadvantage such submissions if points were awarded solely for high reach.

**3. In Section II, Evaluation and Outcomes, remove “emerging” as an evidence base category from the scoring tool, add a question on the use of behavior change theories in the intervention development, and clarify the scoring of intended outcomes and alignment with the SNAP-Ed Evaluation Framework.**

*ASNNA Response:* The content of Federal Register Section II aligns with the RE-AIM construct titled ‘**Effectiveness**’ in the existing Scoring Tool. As noted above for FNS-886, we strongly oppose removing the “emerging” category because doing so will limit the submission of innovative, responsive community-driven initiatives and of multi-component, multi-sector and interdisciplinary approaches that are featured in the *Framework*. We recommended updating the term, ‘emerging’, with language such as ‘having the potential for increasing food and nutrition security, physical activity, and community health, including obesity prevention.’ The evidence-based construct is assigned 8 points, so in the updated Scoring Tool, it will be necessary to adjust the listed factors to earn a high score.

Language of the new question about behavior change theories is not included in the Federal Register, but the factors for a high score listed in the existing Submission Form and Scoring Tool suggest that the new question could ask about behavioral theory base and logic. While using theories and logic models is a best practice in research, in a service program like SNAP-Ed, such a requirement can discriminate against submissions from providers who’ve developed effective approaches and thus discourage the sharing of information needed by other practitioners. We recommend dropping the description of ‘emerging’ as ‘theory or logic with potential for obesity prevention’ and replacing it with more inclusive language. An example might read, ‘emerging evidence includes new facts or data, information, experience, feedback, and uptake, or theories and logic models that support the potential of the intervention for high impact.’ The construct about theory is assigned 6 points, so it will be necessary to update the ‘factors for a high score’ when FNS-885 is updated.

**4. In Section III, Implementation, make minor wording clarifications across questions, and add a question on adaptability of the interventions.**

*ASNNA Response:* Section III in the Federal Register aligns with the RE-AIM construct titled ‘Adoption’ in the current FNS-885 Scoring Tool. There is no information on what a question about adaptability would be, however. In Section III, additional clarification is needed about

adding a question on adaptability. It is not clear how this corresponds to FNS-886, the Scoring Tool.

We recommend adding examples of adaptability approaches for cultural relevance, trauma, and disability and in social marketing initiatives.

**5. In Section IV, Training, Materials and Resources, edit questions for clarity and remove one question on interventions adopted by partners in settings not directly supported by SNAP-Ed.**

*ASNNA Response:* In addition to removing the question on interventions adopted by partners in settings not directly supported by SNAP-Ed, we also suggest removing the question, “Are sustainability concerns reasonable and able to be addressed through routine operation, including expressed or expected partnerships or diversified funding mechanisms? Consider both expressed and intuited concerns.” Sustainability is an important concept for a program overall, as is broad applicability of an intervention to other environments and programs, but sustainability is not a reasonable standard for a new intervention being implemented and studied, especially with SNAP-Ed funds. Using SNAP-Ed funds to examine and provide evidence for intervention uptake beyond SNAP-Ed programs -- that is, through other funding streams and in sites not supported by SNAP-Ed -- to demonstrate sustainability is unreasonable. Additionally, the current scoring on sustainability suggests reviewers consider “intuited” concerns based on the submission process, which implies the sustainability standard may not be demonstrated or assessed definitively, and therefore does not support consistent, equitable scoring. We suggest that the maintenance section and related scoring criteria focus only on maintenance of ongoing SNAP-Ed activities.

***In the Bonus Questions, update the list of populations and settings that are currently underrepresented in the SNAP-Ed Toolkit.***

*ASNNA Response:* Based on our members’ user experience and the projects ASNNA has conducted with the Toolkit, the Framework, the National Strategy, partners, and policy makers, we support continuing to include at least 4 Bonus Questions that encourage submission of interventions, strategies, and approaches to help fill gaps in the Toolkit for:

- Under-represented populations and settings;
- Under-represented Framework outcomes, especially for PSE, social marketing campaigns, multi-sector initiatives that address change in systems, neighborhoods, cities/counties, regions, or states, and population-wide changes by priority population segments;
- Alignment with the 5 pillars in the National Strategy on Hunger, Nutrition, and Health; and
- High-priority geographic areas such as those experiencing food apartheid, rural communities, and Tribal communities.

## Conclusions and Recommendations

Our goal in the above review was for the 2024 revision of Toolkit materials to answer the following questions:

- Would it fill gaps and add new interventions, strategies and approaches that are supporting positive change in under-represented populations and settings?
- Would it fill gaps in the *Toolkit* for multi-sector, social marketing, and population outcomes in the *Framework* and in the 5 pillars of the *National Strategy*?
- Would it be free of factors that disadvantage under-represented groups and embody principles of equity and inclusion throughout?
- Would it encourage the submission and inclusion of new and innovative interventions, strategies, and approaches?
- Will it recognize a wider body of evidence and evaluations, including successful approaches 'emerging' from the field and the scientific approaches used by diverse disciplines and specifically qualitative evaluations?
- Would the Submission Form be easier for the many types of SIAs and for non-SNAP-Ed practitioners to complete and does the Scoring Tool clearly describe the information needed for scoring?
- Does the information in the Submission Form align with the Scoring Tool, including for scoring factors and the number of assigned points?

In the time available for this review, we also highlighted a number of areas that were undefined or unclear. The *Toolkit* can be an exemplary work product. We would welcome the opportunity to help finalize the process by working cooperatively with your team, as we have for prior editions of the Toolkit.

With regards,

Members of the ASNNA Evaluation, Advocacy, Social Marketing, Race, Health, and Social Equity Committees and the Leadership Team