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General Comment

See attached file(s)

Attachments

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University of California
Agriculture and Natural Resources
Nutrition Policy Institute

Jane Duffield, Chief
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Supplemental Nutrition Assistance Program
U.S. Department of Agriculture, Food and Nutrition Service
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October 14, 2015

Dear Ms. Duffield,

Thank you for the opportunity to comment on the proposed Food Programs Reporting System, OMB Number: 0584-0594, Worksheet FNS-759 Education and Administrative Reporting System.

The Nutrition Policy Institute at the University of California (formerly the UC Berkeley Center for Weight and Health) conducts policy-relevant research in order to improve the health of Americans through diet and physical activity interventions. As one of the first research groups in the country to evaluate multi-component obesity prevention interventions in low resource communities, we have amassed a great deal of experience working with communities implementing complex interventions. Recently, we have begun working with the California Department of Public Health to evaluate SNAP-Ed efforts in California. As such, we have thought deeply about the questions raised by this request for comments on the EARS revisions. **Our comments are focused on the policy, systems, and environmental change (PSE) items added to the proposed EARS form.**

In general, our experience in evaluating these multi-sector, complex interventions has taught us that it can be quite difficult to collect accurate and meaningful information about PSE intervention reach, implementation, impact, and expenditures. While we appreciate the desire to limit the response burden on states and local implementers, we are concerned that, as proposed, the data that will be provided to USDA will lack validity and therefore compromise the USDA's ability to make meaningful interpretations from the information collected. **In order to facilitate meaningful interpretation, we recommend that USDA select the most important data elements to collect and provide more specific guidance, including standardized definitions and models for**



producing estimates, to ensure the data are accurate and collected in a standardized manner across states. If some data are considered especially critical for the program, systematic tracking systems to produce high quality, meaningful data are warranted.

We have responded generally to the four areas in which comments were sought, below. We have followed our general comments with detailed comments and recommendations for each PSE data collection item on the proposed EARS form.

(a) Is the proposed collection of information necessary for the proper performance of the functions of the agency, including whether the information has practical utility

Capturing the reach of PSE interventions as well as an understanding of the focus and strength of those efforts is important and useful. However, the current proposal will not allow meaningful and useful aggregation of data about PSE intervention reach and strength. We recommend USDA provide clearer guidance and develop standardized protocols for collecting data across state and local agencies. If each agency develops its own method for estimating counts, USDA will be challenged to interpret the meaning of the information and will not be able to compare states, aggregate data at the national level, or provide insight into what is happening as a result of the program. We have provided specific recommendations for modifying data collection below.

(b) the accuracy of the agency's estimate of the burden hours, including the validity of the methodology and assumptions that were used

The Agency estimates a change in burden hours for each state agency from the current 54 hours to 60 hours annually. It is not clear how the burden hours of response have been determined but our experience leads us to believe that both numbers are a gross underestimate of the total time burden of EARS reporting statewide. Completing the EARS form currently takes a great deal of time in our large state, and we recommend sufficient time and quality assigned to data collection methods that will ensure meaningful and useful information is obtained. Despite USDA not imposing record keeping requirements, state and local agencies will need to develop a mechanism to keep track of the data in order to provide useful information. If agencies produce rough estimates based on best



guesses, our experience suggests that the data will be compromised and of limited value.

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

We suggest USDA consider assessing PSE reach at the institution, rather than individual level. For example, state and local agencies could capture the % of SNAP-Ed eligible schools, parks, stores, etc. reached with SNAP-Ed interventions. Alternately, if assessing reach at the individual level as currently proposed, we recommend that USDA develop formulas to standardize reach estimates in the various settings where PSE interventions may take place. This would allow for comparisons across jurisdictions as well as national aggregation of the data. It would be helpful for USDA to develop models for all estimates being collected, to standardize the way these estimates are calculated. This will improve the quality of the data and lighten the burden on state and local agencies.

(d) ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology

Limiting the data elements that are required to be collected and providing standardized methods and data collection systems for the elements that are to be collected will serve two purposes: first to improve data quality and second to minimize the burden on respondents.

Our specific comments on the PSE data collection items:

Item 1e asks states to estimate the percentage of SNAP-Ed eligible persons reached through direct education, social marketing, and PSE changes. While direct education contacts are relatively easy to quantify in a standardized manner, the number of people reached through social marketing and PSE changes is quite difficult to assess. We have found that measured reach for most PSE interventions is burdensome for organizations to collect and thus would add significant expense to monitoring activities. However, estimated reach figures for PSE interventions, such as Farmer's Markets or corner store conversions, run



the risk of being orders of magnitude off from a true measured reach. Unguided estimates, therefore, may provide a false perception about the true reach of a particular effort and could cause some states to appear to be stronger than other states when in fact this may not reflect the on-the-ground reality. **Thus, the development of common metrics is recommended to allow comparability across organizations and states regarding the reach of their interventions.** For example, USDA could define the reach of an intervention in a corner store or the addition of EBT acceptance at a farmer's market, or could develop a standardized method of estimating reach based on well-developed formulas. While these estimates would not be accurate for all interventions of a particular nature, they would be more comparable than the data that will be generated absent these standardized formulas or models.

Additionally, evidence suggests that multiple intervention touches for a single individual are desirable. Thus, SNAP-Ed agencies should be encouraged to have duplicates in the numerators for the three different categories of intervention (direct education, social marketing, PSE), and even within a single category (the same individual could be reached by multiple social marketing campaigns or multiple PSE efforts). This may not provide clearly interpretable data, however. Details about the intention behind capturing the information in item 1e would be helpful—If it is to combine the %'s and determine the total percent of SNAP-Ed eligible persons reached in a state or if it is to strengthen the intervention dose, then different systems must be put in place. If the latter is deemed useful, as the scientific literature would suggest, a means by which this can better be accomplished and documented will need to be developed.

Item 1f requests estimates from SNAP-Ed funded organizations about funds expended on direct education, social marketing, and PSE interventions. Although it is understood that staff time tracking systems may be burdensome and thus USDA is not providing them, without some systematic effort, the estimates provided will be variable and unreliable. We recommend deleting this item. If it is retained, guidance for completing it should include whether the percent of funds for the 3 types of intervention (Direct Education, Social Marketing, and PSE changes) should sum to 100%; how to account for administrative staff time; and how to construct estimates. Clear guidance should be provided regarding which expenses should be included in these categories, particularly attuned to the fact that some efforts may satisfy more than one (some social marketing approaches may include direct education and/or PSE change) and also that some materials and equipment may be used across intervention categories.



Additionally, an intervention quality/intensity score would provide insight into whether the resources are being well utilized by the various intervention approaches. Currently, EARS does not collect data that will provide insight into whether it makes more sense to spend more resources on education, social marketing, or PSE interventions.

Items 6a and 6b, which ask states to state whether social marketing or PSE efforts were coupled with direct education, are not meaningful at the state level. These boxes would be checked if a single agency anywhere in a given state combines direct education with a single social marketing or PSE intervention. If this information is considered important, it could instead be included in the table in items 7 and 8b, so that each social marketing campaign and PSE is assessed for whether it was combined with direct education. In that case, guidance should be provided to clarify that the direct education provided was directed at the same people who are affected by the specific PSE or Social Marketing Campaign.

Item 8 asks states to count the number of PSEs that were adopted. Given the extremely wide range of possible PSEs that could be adopted (for example, from a candy jar being removed from a church reception area to the full transformation of a school cafeteria), and the huge variability in their potential impact, the aggregation of this information in the proposed form is not useful. Knowing the total number of PSEs adopted in a state says very little about the magnitude of change that might be evidenced on the ground. Perhaps the USDA is interested in a set of particular PSE changes that might occur and could quantify a set of specific interventions adopted. Any counts should be accompanied by some indication of the size and quality of the effort, so that 1 change in 1 place is not counted equally to 1 change that takes place across 25 places. A numeric scale that quantifies the level of effort from major to minor (with accompanying definitions) could be implemented.

Item 8b needs further clarification. Does USDA intend to collect the title of each PSE adopted by each local jurisdiction in every state? If states are to combine PSE interventions across jurisdictions, it would be helpful for USDA to provide a set of the types of PSE approaches that should be included. For example, the table could be organized to include the various PSE intervention settings and could provide sample PSE interventions for each setting. For example:

Sample alternate table for tracking intervention type and reach



Setting*	Site type*	Intervention type*	Number of sites	Estimated Annual Reach**
EAT	Congregate Meals	Nutrition Standards for foods served	6	600 seniors
	Senior Nutrition			
	Fast Food			
LEARN	Early Care and Education	New playground equipment installed	10 centers	500 3-5 year olds
	K-12 Schools	Policy adopted for foods and beverages served at school events	5 schools	1500 students

**These would come from standardized lists*

***Reach estimates would be generated from a model that accounts for particular factors deemed important for each PSE*

While the form currently asks states to describe the estimated reach and assumptions made, because there are likely to be such a large number of PSE approaches in many states, USDA should develop recommended methods for deriving the reach numbers. Models could be generated to assess reach in the various PSE settings, which would provide USDA with comparable data that can be aggregated at the state and national levels and would ease the burden on state agencies. Without standardization, it will be difficult to look at secular changes within states or state-by-state comparisons as well to combine data for national estimates. Additionally, clear instructions about which information should be included in the table is needed.

Item 9 asks states to record the number of partners with whom they work. While we understand that creating partnerships is an important precursor to doing broad work in a community, it would be helpful for USDA to provide clear information about how this information is to be meaningfully collected, i.e., guidance about what to count as a partnership. We feel that partnership information, particularly the financial contributions to/from partners, can be quite burdensome to collect accurately and would be reasonable to omit. At the local level, generating counts of partners without clear guidance about what to count can lead to widely diverse interpretations of the request. For example, a



consulting partner contacted for 10 minutes could be counted as 1, as could a planning partner who contributed 10 weeks of shared work. Thus, the number of partners may say very little about the strength or depth of intervention efforts. Column D asks about the total cash expenditures, which can be very difficult and time consuming to obtain. If this information is necessary, clear guidance about how to do it is needed, and revisions to the time burden for clear and consistent reporting will be necessary. The Partner Title list is helpful. While most categories are self explanatory, the “community-based organizations” category may be better titled “other community-based organizations”, since many of the partners listed could be considered community-based organizations.

Items 10 asks states to choose the top 10 topic areas that were included in interventions. Because the PSE interventions are implemented to impact behaviors, we recommend separating PSE categories from the individual behaviors. For example, item “O. Active transportation” is implemented in order to impact physical activity. Having each listed separately is somewhat confusing. But having one list focused on behavioral interventions and another focused on PSE interventions would help. Further, defining what “food systems, agriculture” means would be beneficial.

We very much appreciate the opportunity to comment on the proposed EARS form and we hope that our thoughts and suggestions have been helpful. Should USDA seek additional information or clarification on any topic above, we would welcome the opportunity to provide more information.