

From: [Barale, Karen V](#)
To: [SNAP-Ed - FNS](#)
Cc: alice_ammerman@unc.edu; [Baker, Susan](#); savaiano@purdue.edu; jsd13@cornell.edu; ann.vail@uky.edu
Subject: Food Program Reporting System OMB Number: 0584-0594
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Comments provided from the Regional Nutrition Education and Obesity Prevention Centers of Excellence (RNECE):

Thank you for the opportunity to comment on: "Agency Information Collection Activities: Proposed Collection; Comment Request-Food Program and Reporting System (FPRS)" (OMB Number: 0584-0594). This comment addresses proposed revisions to the form: "Worksheet FNS-759 Education and Administrative Reporting System"

FNS is to be complimented on their efforts to improve this reporting tool for SNAP-Ed. The additions to the document reflect positive steps forward.

Caution Regarding Cost Comparisons

Caution should be used when comparing raw cost associated with different delivery methods. For example, direct education efforts are often more labor intensive than other indirect methods of delivery. However, within direct education, the cost associated with reaching youth is typically considerably less than the cost associated with reaching a similar number of adult participants. As a result, it is not appropriate to compare the cost per participant for participants involved in direct vs indirect delivery of nutrition education. Nor is it appropriate to compare the cost per youth participant vs adult participant in direct education. Caution should also be used when considering the variation in cost and burden associated with providing actual unduplicated counts versus an estimate of the number of individuals served.

Need for a Web-Based Reporting System

In addition to differentiating between direct education, social marketing and policy, systems and environmental change interventions, FNS should consider developing a web-based electronic reporting system through which implementing agencies across the country could report program outcomes. An example of a web-based reporting system is the WebNEERS system that is used by the Expanded Food and Nutrition Education Program (<http://nifa.usda.gov/tool/webneers>). Such a system could capture information about the participants reached (number, race, ethnicity, age) as well as program outcome information. Program outcome data to be reported should include participant changes in knowledge, skills and attitudes. If common indicators could be identified and incorporated into an electronic evaluation system, implementing agencies would easily be able to enter their program outcomes from the common indicators. These outcomes from implementing agencies could then be aggregated at the regional and/or national levels providing strong evidence of the program's reach and impact.

Also, clarification is needed as the definition of direct education includes the condition that SNAP participation, status, age, gender and race/ethnicity must be collected. Given this definition, under what circumstances would an estimate of direct education participants and contacts be appropriate?

Thank you for considering these comments on the proposed changes to the SNAP-Ed data collection process.

National Coordinating Center – Ann Vail ann.vail@uky.edu

RNECE-North East – Jamie Dollahite jsd13@cornell.edu

RNECE-South – Alice Ammerman alice_ammerman@unc.edu

RNECE-North Central – Dennis Saviano savaiano@purdue.edu

RNECE-West – Susan Baker Susan.Baker@ColoState.edu and Karen Barale kbarale@wsu.edu