

PUBLIC SUBMISSION

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General Comment

See attached file(s)

Attachments

EARS Feedback FINAL

To: USDA, Food and Nutrition Service
Date: October 16, 2015
Re: Comment Request- Food Program and Reporting System (FPRS) Worksheet FNS-759
Education and Administrative Reporting System

FNS is to be congratulated for addressing shortcomings in the previous versions of the EARS report. Definitions in this report are more detailed, the additions of pse reporting recognizes changes in SNAP-Ed guidance, and elimination of outdated requirements are all improvements in this new version.

Opportunities for improvement of the EARS form include addressing guidance/definition of direct education, concerns regarding data quality, differences in reporting burden for estimated vs actual counts, ability to report on PSE initiatives in progress, and partnerships for social media and PSEs. Specific comments follow.

1. Definition of direct education

A direct education session is an event where “SNAP participation status, age, gender and race/ethnicity of people attending a session must be collected” (as defined in the draft EARS form), and this must be an unduplicated count (2a description). Yet, an estimate of number of direct education participants and contacts can be reported (2a table). Under what circumstances would an estimate of these numbers be appropriate? What is the rationale for allowing an estimate of direct education data? Is this simply an oversight needed to be corrected or does the definition of direct education need to be modified?

2. The use of estimated counts

One of the purposes of EARS according to the supplementary information (A. Rowe) is to collect data on “the estimated percentage of SNAP-Ed funds expended to reach SNAP-Ed eligibles through the above intervention types.”

Will estimated counts be used to assess the percent of funds expended to reach SNAP-Ed eligibles, or is the data necessary to complete 1f based on actual budget expenditures.

If estimated counts are used- What accommodations are made when comparing estimated vs actual numbers when assessing states, comparing state agencies, or benchmarking implementing agencies against each other?

Cost comparisons to assess efficiency and similar metrics are inevitable. However, estimated counts are not a reflection of the true production or work conducted by a state agency and should not be used in computing costs for comparison purposes against a state providing actual counts. It is likely that estimates inflate participation numbers, and put agencies that report actual counts in a negative light by contrast. Because the mechanism for estimating values is not defined and subject to the implementing agencies discretion, the results across states will not necessarily be comparable, calling into question all estimated numbers, and comparisons.

If actual budget numbers are required here – the directions should be clearly stated as such. Because 1f follows the calculation of participants, use of that data is implied in calculating 1f.

Specific data issues:

Item 1b: *Number of SNAP-Ed eligibles reached through direct education (this value should match that in Item 2a, Column E)*. There is no component of 2a that sums SNAP-Ed eligibles receiving direct education. There is a row for (1) SNAP recipients, (2) all other participants in SNAP-Ed, and (3) total SNAP-Ed participants. 1b would be the sum of SNAP recipients plus participants that are income eligible for SNAP but not yet participating. Unless otherwise specified the count of all other participants in SNAP-Ed includes individuals who are over income, but interested in participating in the educational event. Clarification of terms and/or intent in 1b and 2a is necessary – and suggest ‘number of low income persons’ as a new category. Summing SNAP recipients plus low income persons provides the number of SNAP-Ed eligibles reached. ‘All other participants in SNAP-Ed’ includes non-eligible upper income people and seems inappropriate to include when reporting numbers in 1b – f.

Item 1c is equally confusing. The form says that 1c should match item 7, column G (summed). The definition of column G = Total Estimated Reach (Number of SNAP recipients, Low income persons and All others). As above “All others” should not be included in the total reported in 1c as ‘all others’ includes people over the SNAP income threshold; and 1c asks for the number of SNAP-Ed eligibles reached. This number could be achieved by summing 7 E (estimated number of SNAP recipients reached) plus 7 F (low income persons reached).

Item 1d. Number of SNAP-Ed eligible reached through policy, systems and environmental change intervention – should match item 8b. The instructions for Reach do not distinguish between SNAP eligibles and the rest of the population. Reach is defined as the ‘audience that is potentially exposed to the intervention’. Given the nature of pse work, whole communities could be exposed to an intervention. What is the goal of this reporting requirement? Is the intent to report on low income participants or the general public?

3. The burden associated with actual vs estimated counts

Estimating counts based on historical trends, audits, or other sampling methods would be an efficient manner to report participation. These methods are minimally invasive or disruptive and require little staff time. By contrast, actual counts require staff time and cooperation of participants at each educational event.

What is the expectation of state agencies to invest in actual counts vs estimates?

4. Direct Education through Social Marketing

Instructions need to be clarified. It appears that the question is about the use of social marketing as a vehicle to provide direct education. If this is the correct interpretation, we suggest that the choices say:

- Social marketing is used as a means of providing direct education
- Social Marketing is not used as a means of providing direct education.

If this is not the correct interpretation, further clarification is needed and/or definitions need to be modified to ensure consistent interpretation across all implementing agencies.

5. Direct Education to Support Policy, Systems, and Environmental Changes

Clarification is needed. If only a portion of those potentially affected by PSEs receive direct education, would the respondent check that direct education supports or does not support PSEs?

6. Policy, Systems and Environmental Change (PSE) Interventions

The ability to report on adopted practices adds depth to the report. However, a good deal of effort goes into PSE work before adoption actually occurs. Section 8 should be expanded to include a table similar to that the table in item 7 for social marketing campaigns in which initiatives in various phases (planning, developing, implementing, and/or tracing and evaluation) can be described.

7. Partnerships

The ability to identify the partnerships integral to the successful implementation of SNAP-Ed is welcome. This section could be enhanced by enabling the respondent to identify the type of activity {direct education, social marketing, PSE} with which the partner is involved. This addition will enable the respondent to not only identify “who” is being worked with and the services exchanged, but the purpose of those interactions. Specifically, we have learned that the successful adaptation of a PSE in a community/school, requires a significant level of commitment and exchange of assistance between SNAP-Ed providers and partner agencies. Should this section be expanded to identify the type of activity with which the partner is engaged, those partners who are most often linked to the successful adoption of PSEs, implementation of social marketing, and/or delivery of direct education can become a “best practices” guide.

8. Program effectiveness

The draft EARS report includes program reach, and in the case of PSEs it includes adoption and implementation. However, program effectiveness is not included for any of the intervention types. A web-based electronic reporting system through which implementing agencies across the country could report program outcomes, a summary of which could then be submitted through EARS would be useful in telling the SNAP-Ed success story. An example of a web-based reporting system the WebNEERS system that is used by the Expanded Food and Nutrition Education Program (<http://nifa.usda.gov/tool/webneers>). This system captures reach and demographics for direct education as well as participants’ reported 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 into EARS 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.

9. Evidence Based Interventions

Much emphasis has been placed on using evidence-based interventions. Although evidence-based interventions are to be used, the fidelity of use and effectiveness when used in new places and with new populations will cause outcomes to vary. If and when behavioral outcomes are evaluated, what assurance of fidelity is necessary?