



Association of SNAP Nutrition Education Administrators

---



July 15, 2021

Elizabeth C. Archuleta  
Director, Office of Intergovernmental & External Affairs  
U.S. Department of Agriculture

**Re: Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Supporting Underserved Communities at USDA**  
**Docket ID: FSA-2021-0006**

Dear Ms. Archuleta,

The Association of SNAP Nutrition Education Administrators (ASNNA) appreciates the opportunity to comment and provide recommendations to USDA to advance racial justice and equity for underserved communities. The comments were developed by our Race, Health and Social Equity Committee.

ASNNA is a non-profit with the following mission:

*Association of SNAP Nutrition Education Administrators (ASNNA)'s mission is to improve the nutrition status of SNAP recipients and those eligible for SNAP Nutrition Education (SNAP-Ed) by utilizing comprehensive integrated approaches to nutrition education, obesity prevention, food security, and physical activity. We will work together to promote communication and serve as a nationwide resource for nutrition education and obesity prevention, build a network of experts, and create partnerships for development and policy advocacy.*

Our comments specifically relate to the SNAP-Ed program. We provide comments below on three select questions (General Questions 4, 5, and 7).

#### **General Questions**

**4. Are there USDA policies, practices, or programs that perpetuate systemic barriers to opportunities and benefits for people of color or other underserved groups? How can those programs be modified, expanded, or made less complicated or streamlined, to deliver resources and benefits more equitably?**

The SNAP-Ed Guidance document limits the ability to equitably provide services to SNAP-eligible people. Examples and recommendations follow.

1. Current SNAP-Education programs must implement and deliver evidence-based nutrition education and obesity prevention activities. While we acknowledge the reason to require evidence-based interventions, the definition of evidence-based does not take into consideration the multicultural lens. According to the SNAP-Education Guidance FY 2021, page 9, “An evidence-based approach for nutrition education and obesity prevention is defined as the integration of the best research evidence with the best available practice-based evidence.” Unfortunately, most research and practice-based evidence was only developed and tested in White communities and has not been adapted for BIPOC (Black, Indigenous, and other people of color) populations and communities. As a result, BIPOC SNAP-Education staff have to do triple the work compared with White SNAP-Education staff as they have to translate interventions designed for White people and translate the contents to specific communities of color.

We recommend that FNS allows for flexibility in the definition of evidence-based and allows each state and implementing agency to implement interventions that may not be generalizable to other states and populations due to the uniqueness of the communities. While FNS allows for implementing practice-based and emerging interventions that may not require interventions to have research-tested evidence (SNAP-Education Guidance FY 2021, pg 19), FNS should explicitly encourage and promote implementers to tailor interventions to be culturally relevant and be specific to the needs of local communities. FNS should not expect these tailored interventions to strive for research-tested standards because the SNAP-Education program aims to serve the local communities instead of generating knowledge for the public. We encourage these interventions to be evaluated and tested for program effectiveness within their contexts, not to generalize the interventions to be applicable in other settings. We encourage FNS to provide technical assistance on how to tailor both interventions and the methods to evaluate them.

2. The existing evaluation requirements also exert great barriers because they only measure certain aspects of SNAP-Education programming and do not value metrics related to multi-year partnerships, for example. We recommend that the development and maintenance of community partnerships be included in evaluation plans (what gets measured is what matters).
3. Currently, SNAP-Education is not allowed to compensate community experts to participate in focus groups for example (SNAP-Education Guidance FY 2022, pg 86-87), but only through reimbursements for incurred costs, via language here:

*Section 3: Financial and Cost Policy 86 | SNAP-Education Plan Guidance Federal Fiscal Year 2022*

*Costs Associated with Other Activities: Allowable*

- *Reimbursement for personal costs such as childcare, meals, lodging, and transportation for recipients of SNAP-Education to actively participate in focus groups, needs assessment, and advisory groups to inform and improve SNAP-Education effectiveness. Allowable costs for focus group participants are intended to reimburse for incurred costs, not to provide a financial incentive for participation.*

- *New: If reimbursement is given in the form of a gift card, it is recommended that the reimbursing organization issue gifts cards restricted from alcohol, tobacco, and gambling purchases.*

Community experts and SNAP-Ed eligible participants are experienced consultants in providing crucial information so that the SNAP-Ed program remains relevant and effective in empowering community changes. We recommend that they are treated as consultants and are able to be paid accordingly and equitably, instead of just being reimbursed incurred costs such as childcare and transportation (SNAP-Ed Guidance FY 2021, pg 84). Instead, within the SNAP-Ed Guidance, allow for individuals to be paid a stipend or honorarium or paid as consultants, who submit invoices.

We also have comments related to SNAP-Ed more broadly:

SNAP-Ed implementing agencies consist of multiple entities such as cooperative extension, non-profit organizations, state or local government, and Indian Tribal Organizations (Puma et al., 2021: [https://www.jneb.org/article/S1499-4046\(20\)30693-X/pdf](https://www.jneb.org/article/S1499-4046(20)30693-X/pdf)). We acknowledge that equity issues are multi-layered and we also create, experience, and perpetuate systemic barriers within our own organizations, that in turn fail to serve SNAP-Ed eligible populations. While this is not under USDA direct jurisdiction, many of these organizations benefit from receiving a large amount of SNAP-Ed funding and we think USDA has huge influence in pushing equity practices within these organizations by explicitly spelling out equitable policies. We recommend FNS reach out to state and implementing agencies on the barriers we face in our organization and plan accordingly.

In addition, as 41% of SNAP-Ed implementing agencies are Cooperative Extension at land-grant universities (Puma et al., 2021), it is worth mentioning that the partnership between USDA and NIFA (National Institute of Food and Agriculture) is crucial. We find some partners within Cooperative Extension do not understand or find it hard to understand the importance and reasons for advocating for human health especially among low-income communities. We think that USDA has the capacity to increase NIFA's awareness in terms of the importance of human nutrition and the wellbeing of society from the lens of Agriculture.

## **5. How can USDA establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities?**

It is critical to have community members at the table, especially when making decisions that will impact that community. There is room for improvement within SNAP-Ed.

USDA, its seven FNS regions, and states should work together to develop an infrastructure with robust technical assistance capacity to provide ongoing subject-matter representation and models of exemplary peer programming, especially for outcomes in the SNAP-Ed Evaluation Framework. Cultural relevance and equity must be addressed across all topic areas.

When connecting with the community, USDA should use plain language and avoid the use of jargon and specialized terms to make reports easily understandable by various audiences. SNAP-Ed can empower communities and programs to use curricula that are tailored to each community, and move away from “time bound to people bound”.

SNAP-Ed currently does not allow for State Implementing Agencies and Implementing Agencies to pay community members for their time, expertise in their own lived experiences. This is a policy change that is recommended to deepen the connection to the community and honor their time and contributions. SNAP-Ed needs to promote the thought that people are their own experts in their lives.

FNS’s philosophy for SNAP-Ed programming provision is rooted in personal responsibility to be healthy rather than looking into systems (root causes). The ideal SNAP-Ed image is a White person eating a salad and that is not equitable, it’s not the reality for many.

SNAP-Ed Guidance related to allowable costs needs to be expanded to allow for meaningful and equitable engagement with SNAP-eligible populations so that those individuals are able to shape SNAP-Ed programming and be compensated for their time. Currently, participant incentives and other forms of compensation for SNAP-eligible individuals are limited and rules are hard to navigate.

We encourage FNS to allow SNAP-Ed state agencies, implementing agencies, and national organizations that serve SNAP-Ed eligible population to be part of the racial equity committee.

**7. Does USDA currently collect information, use forms, or require documentation that impede access to USDA programs or are not effective to achieve program objectives? If so, what are they and how can USDA revise them to reduce confusion or frustration, and increase equity in access to USDA programs?**

FNS has created a manufactured [sense of urgency](#) related to program plan development, implementation, evaluation, and reporting, which limits the ability of SNAP-Ed implementing agencies to use a [participatory model](#) in developing programming. ASNNA believes that formative work (developing programming) is as important as outcome work (implementing programming). We must be allowed to have the time to develop programming with integrity with people, only then we can create equitable programming. One of the manufactured sense of urgency hallmarks is the requirement that even though some states are allowed to create multi-year plans, we still must report on a yearly basis and sometimes that is not feasible. We recommend that Congress require all states be allowed to create three-year plans and report outcomes at the end of the three year period, while also valuing reporting related to (1) formative and process outcomes and (2) partnership development.

FNS’s SNAP-Ed reporting requirements are not equitable. The current systems for reporting do not adequately capture the work SNAP-Ed implementers do. Current reporting does not capture the work it takes to build relationships with communities and people to be able to implement SNAP-Ed programming. Spending time with American Indian elders and community experts, learning and

understanding the culture, and healing are all vital pieces of the work, but they are not valued because they are not counted as part of required reporting.

In addition, from the [Civil Rights](#) training that federal program is mandated to receive, SNAP-Ed implementers have to *“notify the participant that a visual identification of his or her race and ethnicity will be made and recorded in the data system if they decline to self-identify.”* We believe this is antiquated, racist, and may turn SNAP-Ed participants away. We recommend that this is removed immediately and utilize current Census or American Community Survey data to estimate those who do not wish to be identified.

Thank you for the opportunity to comment. Please direct any comments or questions to the ASNNA Leadership Team at [snapedworks@gmail.com](mailto:snapedworks@gmail.com).

Sincerely,

A handwritten signature in black ink that reads "Amy Branham". The signature is written in a cursive, flowing style.

Amy Branham  
ASNNA Senior Co-Chair