

**ASNNA’s Consolidated Review Tool for N-PEARS Comments to OMB**

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**Due April 6, 2023**

This document is a slightly edited Task Force worksheet to help navigate the large OMB package, including the Mockups. Text in different fonts and colors was entered by different members of the Task Force during the 30-day comment period. It may also inform future work on N-PEARS.

<b>Guide to Navigation and Review of the OMB Package</b>	
<b>What This USDA Document Contains</b>	<b>SIA Concerns or Take-aways Relative to OMB Package?</b>
<b>Supporting Statement – Part A for OMB Control Number 0584- (NEW) This is a 25-page overview document for the OMB package!</b> <i>Question: To what degree does this package address insights about the issues that SNAP-Ed must deal with, offer a vision, and outline an inclusive, dynamic plan for the upcoming 3-year OMB cycle through 2027, including planning for next cycle starting in 2028?</i>	
<p>Contents are 18 OMB topics and list of Appendices A-K, as below. Discusses need for data collection and rationale for new system; lists ‘representative’ public comments; how workload burden was approached.</p> <p><b>Burden summary:</b> Itemizes type of workload burden for each of 4 state groups w/ minutes/hours for 2 personnel types, totaling ~390,000,000 hours or ~200 FTEs/year, and pay scales.</p> <p><b>Other Appendices:</b> statutes, regs, Insight’s 2 Data Improvement Action Plans to FNS, screenshots of EARS forms.</p>	<p>The Supporting Statement is a regulatory justification, not a mission-oriented perspective of what benefits and added value to look forward to with the N-PEARS and how roll-out and management of the system would be approached w/ states (SAs and SIAs) as partners. Surprisingly, A1 regarding plans for tabulation and publication of information says <i>‘this collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses’!</i> If not, how can reports be generated for national use, and what is N-PEARS for? This statement is at odds with the purposes of N-PEARS.</p>
<p><b>State Costs:</b> estimated time for new data entry is ~393,000 hours.</p> <p>State level personnel costs total ~\$18M, including fringe. ‘Technical’ = 5 occupational codes including com’y/social service specialist, teachers (including university extension staff), and dietitian and nutritionists.</p>	<p>At 2000 hours/year per FTE, this would be ~196 new FTEs in SAs and SIAs to enter data each year. Doubtful if new data entry will be offset by workload savings for other staff.</p> <p>Not clear that salary ranges (\$34-\$36/hour for ‘technical’ and ~\$38-\$45/hour for managers, + 0.33% for fringe) are realistic for managers and ‘technical’ staff in SAs and SIAs.</p>
<p><b>Federal costs:</b> ~\$3.2 million annually (labor, capital, Operation &amp; Maintenance).</p> <p>Personnel: ~0.8 FTE, &lt;\$100K (administration), ~\$2.5 million (dvpt), ~\$650K (operation and maintenance); ~0.7 FTE, &lt;\$32K (Should be \$100K (info collection))</p>	<p>At only ~1.7 FTE/year, NEB staffing to support management and use of N-PEARS are way too low, especially when all technical functions and deliverables identified in the Insight recommendations are considered.</p> <p>Minor point: There is a small error in the budgeting; includes only 468 hours for 0.23 FTE, but it’s actually 3 people @ 0.23 FTEs = 0.69FTE.</p>
<b>App A, B, D, and G.</b> Excerpts from the 2018 FB, 2010 HHFKA, and the 2021 Executive Order on racial equity, respectively, and the <i>FY 2023 SNAP-Ed Guidance</i> .	
<b>App E1, E2, E3 – Old Submission Process.</b> Screen shots of current EARS forms, namely the secure data entry portal, 6 data entry forms, and home page, all of which expire 7/31/23.	

**Appendix C1 – SNAP-Ed Data Improvement Action Plan** (Insight Policy Research, 45 pages; June 2020).  
*Questions: To what degree does the N-PEARS package align w/ reco's for a national action plan that includes 4 priority data improvements in 5 data categories? Is there now a short-term plan (2-3 years) of piloting, planning, TA and training, then 3-5 years of implementation roll out?*

<p>In mid-2020, the contractor’s Data Improvement Plan discussed data process issues and reco’s of 12 Technical Working Groups (TWGs) having 96 ‘volunteers’. 3 groups met 1 time, the other 9 met 2-3 times. There was little integration among the groups. Discussion dealt w/ process, not content <i>per se</i> or w/ Sectors of Influence or Population outcomes.</p> <p>Recommendations: Work w/ practitioners, ASNNA Eval Comm; develop <i>Framework</i> and metrics further; use FY2023-2025 as a pilot period; then implementation starting FY 2026.</p> <p>Quite a focus on SAs needing help w/ needs assessments, planning, and shift in responsibility from SIAs to SAs. SC for Insight project had 9 feds, but only 4 people from states (1 SA, 3 SIAs), and 2 others.</p>	<p>The Insight Policy Research (Insight) consultation process was good but, similar to the 2015 development process for the <i>SNAP-Ed Evaluation Framework</i>, it lacked final integrative/feedback steps to generate a common vision, integrate elements, work through to solutions, or develop a practical timeline that involves SAs and SIAs.</p> <p>It did not explain the new concern about SAs’ needs assessments/planning that led to subsequent shift in responsibility from IAs in 2023. Note that one of the Steering Committees was composed primarily of federal employees, not SAs or SIAs, and new emphasis represents a significant new workload for SAs and SIAs w/o a clear reason and in spite of capped federal funding; the needs assessments will simply document need but, since projects are already sited in high-need areas, will not enable states to fund others unless resources are taken from existing localities.</p> <p>In general these documents, appendix C1 and C2, should be disseminated and communicated to SNAP-Ed SA and SIA more broadly. The results of these reports increase my understanding of the creation of the mockup. It was a huge missed opportunity that they did not communicate these results to us. People don’t have time to read lengthy reports. There need to be presentations, communications of some sort, directly with us, perhaps in webinar format through SNAP-Ed Connection to reveal the TWG results and then roll out the mockup and ask for public comments. Even though FNS has no say in the timeline of public comments, they know roughly when it is coming, and they could have communicated these results.</p>
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<p><b>Data improvement priorities</b> were:</p> <ul style="list-style-type: none"> <li>▪ Collection and reporting</li> <li>▪ Continuity of data across data life cycle</li> <li>▪ Increasing accessibility and transparency</li> <li>▪ Developing an implementation plan for longer-term improvements.</li> </ul>	<p>Data aggregation seems to be the core message in this section and so this may explain how the current mockup is set up, which is to aggregate data in the short term to communicate SNAP-Ed impact. There’s also a recommendation for FNS to provide a “one stop shop” for all stakeholders to access data, to increase data transparency, which may explain the GIS map of showcasing programming sites.</p> <p>Longer term plans are suggested for roles and responsibilities among key stakeholders and the</p>
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	<p>sequencing of activities such as pilot testing and technical assistance of substantial changes in SNAP-Ed data collection. Longer timeline is defined as 3-5 years of implementation. Current timeline however feels more like a shorter timeline that requires changes within a one to two years.</p>
<p><b>Recommendations by data category</b> were:</p> <ul style="list-style-type: none"> <li>▪ Reach</li> <li>▪ Delivery sites and settings</li> <li>▪ Partnerships and coalitions</li> <li>▪ PSE adoption</li> <li>▪ Individual behavior change</li> </ul>	<p>These were the five areas where TWGs agreed are important to collect to demonstrate SNAP-Ed impacts. These 5 areas made up the mockups.</p> <p>I want to note that Insight explored reporting dosage and population results but did not think they were important enough! For dosage, TWG members thought it was important for program implementers but not to the public; population results are available as secondary data sources so primary data collection is not discussed further. It's in their Appendix in document C1.</p>
<p><b>Recommendations for action plan:</b></p> <ul style="list-style-type: none"> <li>▪ <b>Short</b> = communication plan, annual impact report of outcomes and impacts, data entered into SNAP-Ed Connection; engage other federal agencies; produce plans for pilot testing, TA and training, and timing for L-T rollout.</li> <li>▪ <b>Long</b> = <i>Framework</i>, metrics; continuity; accessibility and transparency.</li> </ul>	<p>Short term is defined as 6 to 12 months. Long term is longer than short term. Short term did include data aggregation.</p> <p>Longer term goals include engaging other federal agencies, developing a pilot testing plan for new data collection measures, developing TA, and rolling out a plan.</p> <p>From the report I am confused what is considered short/near term and what is long term. It's probably in Appendix C2. I am also thinking this is a report by Insight, and FNS can take their recommendations or leave them.</p>
<p><b>Appendix C2 – SNAP-Ed Data Improvement Action Plan 2.0</b> (Insight Policy Research, 26 pages; October 2021). This is a detailed follow-up to Action Plan 1.0; items below are much more fully explained in text of report.  <i>Questions: To what degree does N-PEARS align w/ reco's in 4 priority areas: agency's vision; needs assessment and planning; implementation, outcomes, and impacts; data and results? Are there any new priorities to include, e.g., partnering, equity, coordination, national priorities (White House Conference, USDA Actions on Nutrition Security)</i></p>	
<p>Describes further work of 6 TWIGs: reach, partnerships, behavior change, PSE adoption, social marketing (new), and program access (new). 8 SNAP-Ed agencies 'pre-tested' SP and AR forms.  Reco's are defined:  'near-term'=prior to implementation (FY2023) and  'longer-term'=1-5 years (FY2024+).</p> <p><b>Priority 1: Update SP and AP.</b>  Near-term:  ★ Develop workflow for online system</p>	<p>Is the long-term goal to collect summative reports from all user groups?</p> <p>Insight recommended that FNS create summative reports designed for different audiences to capture info most relevant to them (like SA or RO), pg 5. But there is no output communicated by FNS at all. They also recommend FNS collect feedback from states after the</p>

<ul style="list-style-type: none"> <li>★ Develop and pilot test online system</li> <li>★ Develop and implement a rollout plan</li> <li>★ Design summative reports for all users</li> </ul> <p>Longer term:</p> <ul style="list-style-type: none"> <li>★ Collect feedback on summative reports from all user groups</li> </ul>	<p>roll out of the new system. FNS does not mention this at all.</p> <p>Unlikely that any pilot testing occurred between receipt of first comments in mid-August 2022 and release of revised Mockups in Dec. 2022.</p> <p>Not known if any of the other recommended near-term documents or processes exist or are planned.</p>
<p><b>Priority 2: Promote Data and Equity driven needs assessments/planning</b></p> <p>Near-term:</p> <ul style="list-style-type: none"> <li>★ Develop guidance, TA, and tng resources on needs assessment</li> </ul> <p>Longer Term:</p> <ul style="list-style-type: none"> <li>★ Develop an equity framework</li> <li>★ Promote exemplary SA needs ass'ts</li> <li>★ Automate analysis of 2y data</li> <li>★ Automate mapping to ID areas w/ limited access to SNAP-Ed</li> </ul>	<p>Needs assessment is changed to every 3 years. There is a section added called SNAP-Ed Action plan to explicitly connect needs assessment and SNAP-Ed plan. Insight recommends that FNS develop a broad equity framework to evaluate all aspects of SNAP-Ed as longer term goal. They also said FNS should automate secondary data to help SA and SIA identify gaps in SNAP-Ed participants which FNS said they are doing for the needs assessment.</p> <p>Near-term:</p> <ul style="list-style-type: none"> <li>★ <i>Needs Assessment Toolkit and User Guide</i> were released (Jan. 2023), but I question its fitness for purpose due to focus on secondary quantitative data, lack of partner/community input/consideration of past results. I am concerned at placing responsibility w/ SA, or contracting out, rather than SIAs that have personnel, past info already, partnerships, and knowledge community assets/interests.</li> <li>★ <i>2024 Guidance</i> is expected in April/May 2023</li> <li>★ <i>A SNAP-Ed Data Collection Template User Guide</i> w/ 6 Excel 'workbooks' was posted on SNAP-Ed Connection in January 2023; it is designed for each 'project'. Since N-PEARS is not live, it is not yet known how well templates work for 'projects' or for state summaries. These tasks seem to require highly detailed knowledge about local program sites, activities and outcomes and very skilled data entry personnel.</li> <li>★ A detailed 11-minute YouTube Training video intended as a companion to the above workbook shows SIAs how to enter data for each 'project', transfer data to the SA summary workbook, and print reports. It says to request further assistance from the SA(!). There are 138 views but no viewer 'likes' yet.</li> </ul>

	<p>Longer term:</p> <ul style="list-style-type: none"> <li>★ USDA may work with ASNNA Committees that are addressing these issues: Race, Health and Social Equity, Evaluation, and Social Marketing. Work products include: an equity framework, models of asset-based program infographics, examples of GIS mapping and dashboards, outcome/impact reports, and practical experience using and understanding limitations of national secondary datasets.</li> <li>★ No USDA info on staffing/resources/plan for analyses.</li> <li>★ Not clear that some data sources are relevant/available, e.g., CHNAs, will they show change over time that is useful to SNAP-Ed?</li> </ul>
<p><b>Priority 3: Improve Data on SNAP-Ed implementations, outcomes, impacts</b></p> <p>Near-term:</p> <ul style="list-style-type: none"> <li>★ Develop clear definitions of measures, examples and other supporting documentation</li> <li>★ Set criteria for behavior change questions</li> <li>★ Develop a bank of approved behavior change questions prioritized in updated e-forms</li> <li>★ Develop guidance on use of other behavior change questions</li> </ul> <p>Longer term:</p> <ul style="list-style-type: none"> <li>★ Monitor data to ID needed guidance, training, or technical support</li> <li>★ Create a pool of surveys that align w/ SP (a 'behavior change survey builder tool')</li> <li>★ Periodically assess national indicators to ensure collection of most important program elements.</li> </ul> <p>The 'selected measures' are 'reach' (DE, PSE and SMC) and 'program outcomes' (individual behavior change, PSE adoption, and SMC engagement), but not partnerships, Sectors of Influence, or Population Results.</p> <p>In this report, delivering SNAP-Ed equitably is defined through: budget, sites/settings, ppt characteristics, intervention types, Toolkit interventions.</p>	<p>Page 10 to 15 detailed the measures that Insight and TWGs decided should create the annual report. Agencies can upload files to report other behavior changes.</p> <p>Equity is a topic. "Reach data" can describe population SNAP-Ed reach to identify the extent participants reflect the characteristics of eligible populations. Also, Evidence of SNAP-Ed interventions is collected in State Plans (SP) to follow the 2018 statute and to investigate their investment in the SNAP-Ed <i>Toolkit</i>.</p> <p>FNS is recommended to develop clear measure definitions, examples, and supporting documentation. A glossary of key terms and exemplar plan/forms are useful. Currently while FNS provided definitions, I don't think they provided great examples.</p> <p>There is also a recommendation on developing a question bank. Not sure if FNS is considering it.</p> <p>Citing workload, since last July USDA has not accepted many of ASNNA's strong recommendations to begin updating metrics in the <i>Framework</i> for e-reporting, new priorities (WHC, USDA 'pillars', equity), aggregation, and emerging intervention science.</p> <p>The <i>SNAP-Ed Toolkit</i> is updated only every 2-3 years, so it becomes dated quickly and has many gaps.</p> <p>No explanation is provided for how 'delivering equitably' would be interpreted, measured, or overseen</p>

	<p>in practice, particularly with continued high need and capped funding. SNAP is an entitlement program that can serve all eligible people; SNAP-Ed is not.</p>
<p><b>Priority 4: Increase access to SNAP-Ed data/results</b> Principal outputs are a communications plan, an annual impact report, and adding SNAP-Ed data to SNAP-Ed Connection.</p> <p>Recommends that Executive Summaries have 5 components:</p> <ul style="list-style-type: none"> <li>★ programs and approaches;</li> <li>★ demographic and geographic reach;</li> <li>★ progress toward goals/objectives; coordination w/ other programs; and</li> <li>★ key accomplishments w/ organizational and multi-sector partnerships.</li> </ul> <p>Near-term:</p> <ul style="list-style-type: none"> <li>★ Use expert panel to help develop public-use data files and documentation</li> <li>★ Develop protocols and tools for public-use files</li> </ul> <p>Longer term:</p> <ul style="list-style-type: none"> <li>★ Post state-level summative reports as searchable PDFs</li> <li>★ Publish national SNAP-Ed data file</li> <li>★ Publish annual SNAP-Ed impact report</li> <li>★ Develop a data dashboard to query, analyze, extract SNAP-Ed data.</li> </ul>	<p>Goal is to make SNAP-Ed data open excess (state level data) to the public. Insight recommends convening an expert panel to talk through how to implement this. This is where FNS has not been able to communicate what they plan to do. We are looking forward to receiving FNS guide in this particular topic.</p> <p>The ES Mockup does not contain these elements. The 2 example infographs do not show outcomes or impacts, as required by the 2018 Farm Bill.</p> <p>One NEB staffer is assigned to communications, but as yet, there is no info about what work is planned. No mention in the OMB package of working w/ ASNNA or SAs to do so.</p>
<p>Overall comments</p>	<p>This document provides concrete examples of recommendations by Insight, including timelines. Many recommendations are taken up by FNS. I think at the minimum, those who were in the TWG should have received this report prior to this since we have provided valuable insights in the focus groups. I again think this should be communicated out, but I can also understand FNS may face more questions from the report from SA or IA after sharing.</p> <p>Agreed. Would have been good after October 2021 to get input from the field on the reco's or put them together in a plan so people would understand the big picture and think together about solutions. There weren't new NEB staff yet, but ASNNA could have been invited to provide feedback.</p>

**Appendix F. New Submission Process: N-PEARS Online Forms (FNS-925B and FNS 925A) ~300 pages of ‘Mockups’.** (Appendix F was not found by searching the OMB site; it is posted separately and was found through other communications with FNS.): [https://www.reginfo.gov/public/do/DownloadDocument?objectID=129577400.](https://www.reginfo.gov/public/do/DownloadDocument?objectID=129577400))  
*Questions: How do the new Mockups work for your state? Enter any challenge, concerns, or improvements that you anticipate for your state.*  
*Complete as many of the sections as you can. Remember to identify yourself and choose one color for all your entries.*

**State Plan (FNS-925B)**

*To complete the FY23 AR, you will need to retrieve parts of your existing, approved FY23 SP that have info needed in the new FNS-925B fields.*  
*Short-term: What are the challenges, and changes do you think would improve the AR template (FNS-925B) for immediate use in FY24?*  
*Longer term: What changes do you think would improve the AR template (FNS-925B) for use in FY25 and beyond?*

**State Plan Setup (screen pages 6-18)**

<p>The Introduction says that ‘tasks should be organized to serve each user group,’ that there should be ‘guided interface’ b/c use of the system is intermittent rather than ongoing; that sections will be populated from a previous years’ State Plan (SP) or from the SP to the Annual Report (AR), as appropriate; that drop down features will be available to pull in relevant information; and that a budget Excel template will be provided w/ a mechanism to import data into the e-system.</p>	<p><u>Practical?</u> Seems straight-forward to set up.</p> <p><u>Question?</u> Will the set up of the plan carry from year to year or need to be reset each year?</p> <p>The new Executive Summary that provides an overview of how N-PEARS is organized and expected to work is very helpful. For the 3 ‘user groups’ (federal government, state agencies (SAs), and state implementing agencies [IAs]), it is unclear how the access to sections interplay between and among SAs and IAs will work, and in review sections, it is unclear how SA and FNS reviewers interface with each other or with SIAs. Since there are screens to view but no live data entry fields for states to test, it is not knowable how smoothly data will transfer from one year to another or between the SP and the AR. The template for transferring detailed budget information is not yet available, so there’s no way to know if it will meet the needs of organizations with diverse accounting systems.</p>
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<p>The ‘Welcome’ page includes: a checklist for SPs and ARs from 2020, 2021, and 2022; screens that tell states to start the SP and AR, that they’ve started, and that they’ve submitted each for approval; a status report on SPs for all States in an FNS Region, both original and amended; ‘‘feedback’ on the SP; a screen to start an amendment but with no further information.</p>	<p>There is no explanation of why or what information from years predating N-PEARS is included in the new system. It is unclear if states have access to each other’s information, including approvals and feedback; there is no information on how SIAs would receive ‘feedback’ from the SA or FNS, or how SIAs would submit amendments.</p>
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**Annual Plan Overview  
Target Audience & Needs Assessment (22-43)**

Instructions require SAs to conduct a comprehensive needs assessment every 3 years and update it annually.

**Process:** Describe stakeholder engagement w/ SIAs and other stakeholders to learn audience needs; factors that promote/inhibit SNAP-Ed access; appropriateness of programming for target audiences; and use in setting 5-7 state priority goals for SA and SIAs. Each goal should inform SMART objective and performance indicators. The screen calls for listing the stakeholders engaged by the SA (500 words) and process for setting goals and tracking progress (250).

**Data types:** Use secondary sources like state, hospital, and community sources to learn rates of: obesity, type 2 diabetes, cancer, hypertension, high cholesterol, FV and PA behaviors, HH food insecurity; people @ “85% poverty line” (typo).  
Community food access data uploaded from USDA/other sources.  
Demographic characteristics @ <185% FPL; races, ethnicities, ages, primary languages, population by county of <185% FPL; presence and names of tribes in state; ‘other demographics’; SNAP ppn by county.

**Synthesis:** Gaps in geographic reach, how they will be addressed, other contributing factors. ‘Program appropriateness’, e.g., strengths and weaknesses, how SA will address.

**Coordination and partnerships:** strengths and improvements needed (250 words each).

**Workforce capacity:** strengths and needs (250 words each)

**5-7 Selected Priority Goals:** Based on last 3 years of effort, SA checks off any of 9 types of goals (health behaviors, improved SNAP-Ed access, PSE changes, multi-sector outcomes, coordination/collaboration, improved appropriateness, workforces)

Practical? Data requested for the Needs Assessment seems practical

Enhance quality, utility, clarity? Seems counter-productive to have states select priority indicators for SMART objectives that are not set up to be captured directly in the N-PEARS report.

Needs Assessment Process section is vague and needs clarity as to what information is being sought. What processes does FNS imagine states going through to develop goals from the Needs Assessment, other than conducting the needs assessment?

Will information on Tribes be auto-populated? If not, what is the recommended source to use for this information?

How will goals that span 3 years for achievement be indicated vs goals that happen annually?

Realistic Data Entry Burden? With the auto-populated data for some sections, the workload burden is lessened. Without knowing exactly what activities counted towards workload burden estimates, it is hard to know if they are accurate. If the estimate is meant to encompass finding the data for the needs assessment across various sources, the burden is likely too low. If it is just for entering the data into N-PEARS, it is likely more than adequate.

Minimize Burden: Pre-populating some of the data from the American Community Survey seems to help minimize the burden. Are programs expected to go back and verify the data?

Questions?

For states that already did a complete needs assessment in 2023, what will be needed?

How will this work for states with multi-year plans already in place? Ideally, the 3 year needs assessment would align with the start of a new 3 year plan.

Note that we do not have data available for some age groups that are within the last 5 years.

Note that the word count for some of the narrative sections is limited.

- This section of the State Plan is newly re-assigned to State Agencies, away from SIAs,



	<p>although SIAs may be given simultaneous access by the SA. Few SAs, if any, have previously performed the needs assessment and goal-setting functions and few, if any, have staff with advanced nutrition and public health planning skills called for by this process. Thus, the true workload burden for SAs is unknowable.</p> <ul style="list-style-type: none"> <li>● The 30-day comment period was insufficient to assess by how much the new Needs Assessment would increase workload, the value of new information, or whether new information was appropriate to use in assessing change in 3 years, which seems to be a principal purpose of the expanded, 3-year Needs Assessment.</li> <li>● The N-PEARS Needs Assessment lacks any information about the interests and assets of eligible communities, an essential element in equitable program delivery, and an important consideration in determining how funds can be spent most effectively.</li> <li>● As a grant program, not an entitlement program like SNAP itself, funds are insufficient to offer SNAP-Ed to all eligible people. By definition, gaps will be found and many groups and locations will lack SNAP-Ed services. For permanent community change, long-term support is needed. It is not practical to use the data in the needs assessment every three years to withdraw funds from existing successful programs that are showing progress toward achieving long-term sustainability.</li> <li>● At a national average of \$5.15/year in SNAP-Ed funding per eligible person, funds are insufficient for most eligible people and communities to receive SNAP-Ed programming. The Needs Assessment falsely assumes that resources can easily be redirected.</li> <li>● Last, the 30-day comment period has been insufficient to review new USDA tools, the <i>SNAP-Ed Needs Assessment Toolkit</i> (December 2022, 40 pages), the very technical <i>SNAP-Ed Data Collection Template User Guide</i> (January 2023, 39 pages), and the YouTube video which would better explain requirements, workload, uses and outputs of the new Needs Assessment.</li> </ul>
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**SNAP-Ed Action Plan**

**Objectives & Indicators (45-50)**

<p><u>Priority Goals:</u> In the Overview, each of 5-7 Priority Goals is to have <math>\geq 1</math> SMART objective, the ID number of <i>SNAP-Ed Framework</i> outcomes (but not metrics), and other performance measures.</p> <p><u>SMART objectives:</u> All ‘projects’ and non-projects are named, show SA or SIA(s) that will conduct it, and which SMART objective(s) each addresses.</p> <p><u>SNAP-Ed Outreach:</u> The SA is to describe how it notifies SNAP applicants, participants, and eligible individuals about SNAP-Ed activities, naming any specific groups and how state and local SNAP offices will do so.</p> <p><u>Action Plan Overview:</u> Describe how work of SA, SIA, and subgrantees fit together to support healthy eating and physical activity (500 words).</p>	<p><u>Practical?</u> SNAP-Ed Outreach is planned for, but then not linked in the Reporting modules. This is illogical and seems like extra work to plan for, if it isn’t considered at the end of the year.</p> <p>The Action Plan Overview feels unnecessary, given the set up of the Needs Assessment, Priority Goals, SMART Objectives, and Planned projects. This is especially true for states with one IA. This section maybe more useful for states with multiple IAs.</p> <p><u>Enhance quality, utility, clarity?</u> Unclear if the SA or IA completes the Project SMART Objectives page.</p> <p>Project SMART Objectives table feels backwards, thinking about flow from goals to objectives to projects. Suggestion to flip it so it list Goals-SMART Objectives-Project-IA.</p> <p>How will objectives that span 3 years for achievement be indicated vs objectives that happen annually?</p> <p><u>Questions?</u> Need a good understanding of how we will define project.</p> <p>How many SMART Objectives per goal?</p> <p>Is this one of the sections IAs can be given write-in access to by the SA?</p>
<p><u>Planned Projects and Activities:</u> Each planned ‘project’ and ‘nonproject activity’ is to have a name and description (100 words); which SMART objective(s) it addresses.</p>	<p>The architecture of this section is difficult to navigate.</p>

**Planned Projects & Activities (51-82)**

<p>For each ‘project’ and ‘nonproject’ a text box is provided to describe it. Other than the name of the project and the SMART objective it is associated with, there is no information about what elements to include (word limit not given). For each entry, boxes are shown to check when ‘project’ is complete/modified or to add a project/activity.</p>	<p><u>Practical?</u> Direct Education &amp; PSE Settings table feels unnecessary for several reasons: a) Based on our projects, settings could be duplicated across projects b) There is no corresponding table in the report c) Unclear what the purpose and use of this information is d) Because qualifications of sites happens annually and we start planning in January, it will be difficult to give an accurate estimate of the number of sites per setting for the following year.</p> <p><u>Enhance quality, utility, clarity?</u> Unclear how to get from the Add a New Project pop up box to the Basic Information sections of a project or activity.</p>
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In the Plan, we complete the Direct Education & PSE Settings table but in the report, it is all by site. It is illogical to report this information differently across the plan and report. Is this table used in comparison to estimated budgeting for projects? If so, this needs to be made clear and, if so, it seems like necessary information is missing to provide useful detail for this context.

Suggest changing the Schools scale for SMC to Agency or Site-Specific. SMCs happen in sites beyond schools.

Suggestion to allow a file upload option in addition to link or citation option for providing proof of intervention results for Other Previously Developed Interventions

Suggestion to allow file uploads for foundation evidence for New Interventions

Realistic Data Entry Burden? Without knowing exactly what activities counted towards workload burden estimates, it is hard to know if they are accurate. If the estimate is meant to encompass. The bulk of the burden seems focused on this section and noting some of the requested information, there are especially burdensome areas that may account for this time allocation.

Minimize Burden? Direct Education & PSE Settings table is burdensome and seems irrelevant to program planning. Suggestion to remove.

Questions? Narrative section word limits for Basic Information may not be enough.

How should Project Outreach be considered differently that the Priority Goal focused on improving program access and appropriateness? Concerns that there may be a lot of overlap here.

Each Project requires: **Descriptions** to include 12 different bullet points (500 words); whether it's **multi-agency**; and **year** of implementation; **SMART objective(s)** it will address; **planned approaches** (DE, PSE, or SMC, each w/ 5 stages of development; for DE and SM, in which languages it will be conducted); **priority populations** (6 categories); **project outreach** (250 words); **settings, sites** (for each of 20 setting types, the planned number of total, tribal and rural sites and presence of DE or PSE approaches); **social marketing** campaign scale, geography (name of media market, zip codes?, 100 word text), and projected reach.

The information justifying each 'project' appears to require retrieving and re-entering information that has been submitted in past years. The types of detailed info also are a vast increase over past requirements. For agencies with new personnel, or for new agencies, this could be very time-consuming. The workload of justifying each approach and activity could have a deterrent effect on customizing projects for different locations or populations or for developing new approaches and innovation. Programs responsive to community needs for approaches than those in the *Toolbox* will have a heavier planning burden.

<p><u>Evidence-based Interventions</u>: 3 types are listed. <b>SNAP-Ed Toolkit</b> interventions (100+ dropdown choices) w/ adaptations described (250 words); <b>previously developed</b> interventions (any adaptations [250 words] and levels of evidence (emerging, w/ alignment w/ national standards and purposes), foundational evidence that will be developed this year (250 words) and whether practice- or research-tested, w/ sources and publications cited); and <b>new</b> (including USDA approval, processes and people who will be involved, and evidence base).</p>	<p>For SIAs with multiple projects, this will be a significant new workload that, for many, is likely to require redirection of personnel from community work or hiring of new personnel/temp help.</p>
<p><b>Planned Evaluations (83-93)</b></p>	
<p>Section begins with an overview of evaluations for each 'project', the type (formative, process, outcome, or impact) and check box to enter when description is complete.</p> <p>Each evaluation project must have: basic info (name, 'projects' it pertains to); check box details for each type including components that would be included (DE, PSE, SM), data collection methods, planned use of the evaluation results; and for impact evaluations also the study design (RCT, comparison, no comparison), measurement approaches (pre/post, other); logic model files.</p>	<p><u>Enhance quality, utility, clarity?</u> Allow file uploads as well as links for prior evaluations (Outcome and Impact evaluation pages)</p> <p><u>Realistic Data Entry Burden?</u> For IA, workload burden seems accurate if it is just for entering into N-PEARS, but not if it includes efforts prior to entering into the system. This is for an estimated 3 projects with maybe 7 evaluation plans. Burden will be more with more projects and evaluation plans.</p> <p><u>Questions?</u> Should every project have a planned evaluation?</p> <p>SPs are prepared 6 months or more ahead of work that begins for a 12 month period beginning October 1, so detailing the specifics of each evaluation is an unrealistic level of detail. There is no information about how these preliminary descriptions would be used and a high likelihood that review processes at ROs (August 15-Sept 30) could delay SP approval, annual funding, and program services. Many evaluations may be ongoing and thus approved from prior years, so much of this information duplicates information USDA already reviewed. In 2014-2016, ARs in 127-153 SIAs planned about 900 evaluations a year, of which over 400/year were outcome or impact (Altarum, 2018). Today, there are over 165 SIAs. If evaluations continue apace, it is unlikely that the ~15 RO SNAP-Ed staff have time, qualifications in different scientific disciplines, or state/local knowledge to review a potential 900+ evaluations each year nor evidence that this would add value to SNAP-Ed outcomes and impacts.</p>
<p><b>Coordination &amp; Collaboration (94-102)</b></p>	
<p>For each of <u>20+ USDA, CDC, and DHHS programs</u>, requires entering whether there will be ongoing dialog and resource sharing at state, regional or local levels and the</p>	<p><u>Enhance quality, utility, clarity?</u> In the review the Federal Programs Coordination, there is a nice table that shows the information. This type of table would be</p>

<p>purposes of each in 5+ dropdown categories. For each, requires a written agreement w/ role delineation and responsibilities of SNAP-Ed and other USDA program.</p> <p><u>Multisector partnerships/coalitions</u>: Names of entities w/ checkboxes for geographic/tribal level and descriptions (250 words) are to be entered for 12+ sectors.</p> <p><u>Tribes/Tribal organizations</u>: Tribal organization, name and title of the person contacted in each, the nature of planned communication (5+ dropdowns), and 2 text boxes for outcomes and impact on SNAP-Ed SP and for a description of written comments that were received are required (250 words each).</p> <p><u>Minority-serving Institutions (MSIs)</u>: Institution's name, dropdowns for type (HBCU, Hispanic, tribal, Asian American) and nature of planned coordination(5+ categories), description of planned coordination (250 words) is required for each.</p>	<p>easier to enter information into compared to the way this page is set up.</p> <p><u>Realistic Data Entry Burden?</u> In the review the Federal Programs Coordination, there is a nice table that shows the information. This type of table would be easier to enter information into compared to the way this page is set up.</p> <p><u>Federal programs</u>: It is not clear if this is required of the SA or of each SIA. It's a significant new requirement for SNAP-Ed, and other federal programs have no such mandate, so reaching out and working with each would be a significant new workload and reporting burden for SNAP-Ed.</p> <p><u>Partnerships</u>: In 2021, USDA reported 37,000 SNAP-Ed local 'partnerships'. N-PEARS adds the requirement to enter names and text descriptions of each, a significant increase in outreach, reporting and data entry; how USDA would tabulate and present these data is not explained.</p> <p><u>Tribal groups</u>: The new requirement to name any of the 570+ federally-recognized tribal bodies and individual leaders in each is both a workload and privacy issue, as permission would be required to enter people's names, no purpose is given for needing names, and there is no explanation of how their name would be used in a government database, a potential privacy violation. This would be a burden especially With half of all tribes</p> <p><u>MSIs</u>: The new requirement would require naming and describing planned work with any of over 700 MSIs (107 HBCUs, 35 tribal, 570+ Hispanic, and an unknown number considered Asian-American serving). This is a new requirement and a significant increase in outreach, reporting, and data entry. How USDA plans to use, tabulate, or report out the information is not described.</p>
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**Budget Import (103-116)**

<p><u>Summary budgets</u> and budget narratives are to be submitted for the SA and each SIA with 11 cost categories.</p> <p><u>Personnel budgets</u> call for: position titles of all staff paid by SNAP-Ed; FTEs charged to SNAP-Ed; % time on management or program delivery; and salary, benefits, and wages (federal share only). <i>Expenditures</i>: SNAP-Ed project and non-project expenditures, and non-SNAP-Ed funding, must be shown in 10-line item budgets. <i>Travel</i>: Every in-state and out-of-state trip must be itemized w/ the purpose of each, destination, classifications traveling, and costs for air, mileage, lodging and per diem include number of staff, mileage, cost per unit (person, mile, day).</p>	<p><u>Practical?</u> Budgeting by project feels unnecessary and burdensome in our state with only 1 IA in which all staff do a variety of projects (DE, PSE, SMC) to meet local needs rather than staff with specific project work.</p> <p>We have 1 IA where staff do multiple jobs and cross over to different parts of the plan as needed. Budgeting by project would be very inaccurate to what may actually happen because of the nature of our IA.</p> <p>Putting non-SNAP-Ed funding into the SNAP-Ed plan is unnecessary and inappropriate. This is the SNAP-Ed plan. Why is this information requested?</p>
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Descriptions defining the basis for calculations of each (100 words) and Job descriptions for each position are to be attached.

An app to upload SA and SIA excel files into N-PEARS is under development but not yet available to test.

'Project' Budgets: A new N-PEARS requirement is to provide itemized budgets for each 'project' at the same level of detail as for total budgets, above.

Estimated Unobligated Balance: States have 2 years to fully expend each year's SNAP-Ed allocation. SAs and SIAs each estimate and add the carry-forward funds into the next year's program budget. States spend-down prior year funds before billing against the current year.

Program income definition is illogical- if materials are sold at cost, then no money is earned

Enhance quality, utility, clarity? If the budget import tool is used, what does it do to the rest of this module? It is unclear what parts of the module would be populated by the import and what parts would not.

Useful that if there are errors in the budget import of the Excel, that annotated feedback is returned.

Budgeting by project decreasing ease of use and utility for our program.

Why the requirement to share about on non-SNAP-Ed funding? What is the purpose?

What is the purpose of the budget narrative, especially given the budget by project? What different information is gained in the narrative that isn't clear elsewhere in the plan?

Suggestion to allow SAs/ROs to be able to comment in specific sections on changes needed, rather than the single text box at the beginning of the review module.

The Review pages for the sections of the plan do a nice job of giving a clear big-picture view of the plan. It would be nice if IAs had something similar to look at prior to submitting to the SA to review.

Realistic Data Entry Burden? Doing a budget for non-project activities (like trainings or committee work) is going to be a significant challenge where salaries/benefits are concerned.

Minimize Burden? Make budgeting by project optional depending on staff structure of the IA.

The travel budgeting section is nice and easy to work through.

The travel budgeting requirements seem impractical- with knowing where you are going, who is going, the amount of money you will need (especially with ever-changing costs of flights, etc) that far in advance. The way travel was previously provided seemed reasonable.

The Budget Narrative is unnecessary and adds a burden with no apparent purpose.

Questions? Are there limits on file sizes for uploads?

Budget detail: N-PEARS calls for a high volume of new SNAP-Ed budget information that has never before been required by USDA for entry into a federal database, exceeds that of other federal grants that SNAP-Ed programs participate in, and appears to exceed statutory requirements. Like other federal programs, SNAP-Ed budgets are prepared by SAs and SIAs following their institutions' protocols (for personnel, travel, direct costs, and so forth) then submitted showing totals in each federally-required line item. For university and government agencies, budgets are prepared according to federally-approved institutional procedures and rates. The paperwork is maintained on file for inspection and checked during Management Evaluations.

Staff: The number of people working in SNAP-Ed has never been tallied by USDA before and thus it is not known how much new data entry is being generated or how it will be used. All personnel costs are approved by the employee's institution, the SA, and USDA annually. N-PEARS would impose a significant new workload to enter details for thousands of positions and thousands more trips since some jobs require multiple trips every month. Specific purposes and destinations for each trip are unknowable so many months in advance. It is not known why this volume of new information is needed or whether it has any planned use by USDA.

'Project' budgets: As an additional, duplicative budget to that of the total SIA, 'project' budgets are a significant, unnecessary, and infeasible added workload of no use to SIAs which also exceed statutory requirements. The 2018 Farm Bill required that SNAP-Ed 'projects' report outcomes and impacts, but it did not require separate budgeting. For efficiency and effectiveness, individual SIA staffers typically work on multiple, inter-related projects and do not allocate time separately; similarly, travel and materials typically are planned to support multiple 'projects'.

Since 'projects' are monitored for process and outcome results, and an SIAs budget is reviewed for USDA allowability, there is no purpose for SIAs or justification

provided by USDA for the added workload of budgeting 'project' resources separately.

**State Plan Review Mockups for SA and RO, Assurances, Amendments (120-153)**

A summary screen provides the SA with the status of review, change, and approval for each of the 4 main sections of SIA state plans: projects and activities, evaluations, coordination and collaboration, and staffing and budget.

Subsequent screens call for SAs to request changes to each 'project', each evaluation, each coordination & collaboration, the overall SP and 'project' budget of every SIA. Check boxes are provided to show that each element in each section was reviewed, but it's not clear whether this is the SA double checking that each box or file was completed or, if the SA reviewer is to enter any notes that would help generate the change requests, how this would be done.

The text boxes for change requests to SIAs have no word limit. Since the mockups are not interactive, it is not clear what info SIAs would receive from the SA to use in making changes.

This is a new feature showing SA reviews of SIA SPs. It is not clear from the screens how it is to work; the review appears to be of both the SP for the whole SIA and complete details of each 'project', including its separate budget, staffing, and trips.

The same budgets appear to be presented in two different ways and so are not only being generated twice, but also are reviewed twice, more than doubling the workload for both SAs and SIAs!

Assurances and Signatures consists of a downloaded checklist and uploading of the signed form.

**Annual Report (FNS-925A)**

*Questions: In anticipation of preparing this your FY23 AR with the data elements shown in FNS-925A, what challenges do you anticipate? What recommendations do you suggest?*

*Longer term, what changes do you think would improve the AR template (FNS-925A) for FY25 and beyond?*

**Manage, Overview by SIA (screen pages 154-160)**

Similar to the State Plan (SP), the 'Welcome' page for the Annual Report (AR) includes: a checklist for ARs from 2020, 2021, and 2022; screens that tell states to start the 2023 AR, that they've started, and that they've submitted each for approval or to start and amendment. The screen for 'feedback' on the AR is unclear, as it has a box to indicate that an amendment is being started, but . Unlike the SP, there is no status report on ARs for all States in an FNS Region. , both original and amended or for "feedback' on the AR.

Overall question: Will data that is updated in the report carry into the next year's plan or need to be re-entered again into the follow year's plan? Similarly, will data from one plan populate into the next year's plan? Also, will data auto-populate from report to report across years (like the PSE change tables)?

Welcome screens: There is no explanation of why or what information from 2020-2022, years predating N-PEARS, is included in the new system. Unlike the SP, there are no screens that indicate access by states to each other's information including feedback, amendments, or approvals.

New review/approval processes? This was a real time sink b/c the AR Welcome Mockups are wrong! AR screens show the same formal 'feedback' and approval steps between SAs and SIAs as for the SP, namely that SAs would provide 'feedback' after which SIAs would



start an 'amendment', followed by SA approval of the AR and submission to USDA.

The *screens for reviews/approvals of ARs were lifted by mistake from the SP Mockups*. Finally figured this out by checking the (very dense) ICR Time Estimates which show no time allocations for reviews and amendments of ARs by either SAs or SIAs. There is no review process for ARs!

### Coordination & Collaboration (161-169)

Federal programs: For all 20+ Federal programs, SIAs re-check the same boxes as in the SP and enter 'data' in text boxes for each. There is no description of what data to provide in the text box.  
Multi-sector partnerships: For all 12 sectors, SIAs re-check the same boxes as in the SP and enter text describing key activities over the past year.  
Tribes and Tribal Organizations: For each Tribal organization, information added to that already in the SP includes: funding, FTEs, and other resources provided by SNAP-Ed to each, along w/ 'key outcomes' for each (250 words) during the year. Information for additional Tribes can be entered.  
Minority-Serving Institutions: Similar to Tribes, info added to that in the SP is funding, FTEs, and other resources provided by SNAP-Ed, along w/ 'key outcomes' for each (250 words).

Functionality: Information from the SP should pre-populate these screens but until the system is live, the functionality is unknown.  
It also is not clear how data between the SP and AR will be appear to users: If there is a change in type of coordination, does a question pop up showing the SP entry and ask for a description of the change in the AR?  
Utility: Once entered, it is not explained how the text information would be used or aggregated.  
Outcomes and outputs: Unlike Tribal and MSIs, text boxes for the collaborations among federal programs (which have been OMB, CBO, and statutory concerns) and for public/private partnerships (a unique feature of SNAP-Ed and White House Conference priority) do not ask about outcomes or results!  
  
That said, there is the potential for a large amount of valuable qualitative information, but it is not clear what kinds of info is wanted or whether there will systematic methods to retrieve it. There is no guidance about what to enter in the text boxes, such as progress toward goals of the SP, *SNAP-Ed Evaluation Framework* outcomes, community/partner feedback, success stories, or unexpected benefits and setbacks.

### IA Expenditures (170-179)

SIAs each report actual/billed expenditures by: SIA total; for every SIA 'project'; for other purposes (not 'projects'); and for indirect expenditures in the same detail as line items of the SP. The total unobligated balance/carry-over from the prior FY, if any, is reported. Program income, if any, is reported with a text box explanation of how/why it was generated and how it was/will be used (250 words).

Practical? Having a budget narrative in the report makes more sense than having it in the plan, as it would allow for explanations in differences in planned budget vs actual expenditures.  
Program income definition is illogical- if materials are sold at cost, then no money is earned.  
Enhance quality, utility, clarity? Will the budget auto-populate over from the plan for updating or need to be manually entered completely?

Minimize Burden? Allowing the report on budgeting to autopopulate over from the plan and/or through a file upload, as in the plan, would help decrease burden.

Functionality: Detailed budget information from the SP is expected to pre-populate these screens, but until the system is live, this functionality is unknown.

Differences: There are no feature in the screens to comment about any differences in budget between the SP and the AR. SIAs may make changes +/- 5% and obtain formal amendments for budget variations. It is not known if variances would be flagged or trigger error messages.

**Project & Activity Results (180-224)**

Introductory screens are (presumably) pre-populated w/ a list, description, the SMART objectives that each ‘project’ and ‘non-project’ from the SP. Each is marked if ‘complete’, and unplanned ‘projects’ can be added. Subsequent screens, (presumably) pre-populated from detailed ‘basic’ info in the SP, allow editing/updating of past info or the addition of new descriptive info. The entry of new or changed interventions asks the same info as was required in the SP (500 words).

Results for each intervention are reported as: *SNAP-Ed Evaluation Framework* indicators that the project measures (dropdown); for every single site, the site name, setting type, jurisdiction type, approach (DE or PSE), street address, and area type (urban, suburban, rural, frontier); if in a tribal jurisdiction, name of tribal organization, intervention approaches, site address, and rurality).

Direct Education: stage of intervention, results (250 words); languages (25+ dropdown); unduplicated reach (actual and estimated) by total, 4 ethnicities, 6+ races, gender; 8+ age cohorts; methods used for estimating counts (500 words); mode of delivery (virtual or in-person, series type, number of in-person and virtual sessions; estimated minutes/participant).

Behavior change pre/post results for MT1c FV (3 ages in number meeting guidelines, cups/day, times/day), SSB (fewer), and 8 other dietary practices; MT2 (pre/post for 15 metrics; and MT3 (2 aged groups w/ pre/post + 12 other metrics)

PSE Change: For every site in every setting type: changes maintained (from prior years) w/ estimated reach and description of each; and changes adopted, with reach and description for each site. Sites (name, address, reach, PSE type).

Practical? SNAP-Ed Outreach is planned for, but then not linked in the Reporting modules. This is illogical and seems like extra work to plan for, if it isn’t considered at the end of the year.

The Project Sites table is confusing. I’m interpreting this to be completed per project. If so, this is a lot of entry across multiple projects. If the table is completed only once, can a site have more than one intervention?

On the PSE Change tables (2) why are the description of changes needed? Are these changes pulled from the PEARS list? What if the changes a site adopted do not correspond to the options? How is listing our each individual change going to be used rather than a total number of changes either adopted or maintained? Is it necessary to tease out adopted v maintained?

What is the purpose of the Active Partners chart for PSEs? Is this not captured in the PSE Change tables?

Enhance quality, utility, clarity? Unclear how performance indicators that are not part of the SNAP-Ed Framework will be captured and where.

Clarify the purpose of the Project Sites table and how it will be used. Are there concerns from partners about privacy given that address is included in the table?

For the Project Sites table, is there a definition or set of guidelines to help determine what area type a site is?

For Mode of Delivery for DE, this wording is confusing and somewhat contradictory, “What is the estimated **total amount of time** participants engaged, **on average**, in the DE intervention?”

The number of active partners that contributed to PSE are listed by 4 geographic levels w/ 10 different types of contributions.

Social marketing results are shown by stage and descriptive info (500 words); 25 languages; 5 topics; scale; 11+ market segments (MT12b); impressions, reach and engagement by 11 different medium types.

Indirect education: Check boxes if educational info was offered and, if so, through any of 11 communication channels (mass media, web, posters, social media, etc.) and in any of 25 languages.

Other Results (Optional): A text box (250 words) is provided to describe any other results. Appears that subsequent screens with check boxes are to identify Priority Populations and links to SMART objectives.

What does it mean that we should report unmatched data for the Individual Behavior Change data?

On the PSE Change tables (2) why are the description of changes needed? Are these changes pulled from the PEARS list? What if the changes a site adopted do not correspond to the options? How is listing our each individual change going to be used rather than a total number of changes either adopted or maintained? Is it necessary to tease out adopted v maintained?

Are Indirect Education Channels reported for each project or all lumped into one?

For the Optional Results, is this where other indicators from the framework (or not on the framework) are uploaded? How many times can results be entered here? How will this information be reviewed and used?

Putting the Priority Populations and Link SMART Objectives pages at the beginning of this module makes more sense.

Minimize Burden? Project Sites table: The burden of entering individual sites for each project cannot be understated. We had over 300 sites we worked with in FFY 2022, many of which were engaged in multiple projects. This means that site will have to be entered multiple times across projects, which seems duplicative. While the ability to upload sites may decrease the burden, separating out sites based on project will be a challenge. If this data can be imported from PEARS, careful consideration needs to be given to the information collected in PEARS and requested here to ensure that data does not need to be cleaned or sorted prior to uploading.

The 2 tables related to PSE Changes are incredibly burdensome. Suggestion for one table that captures all the needed information so that time is not spent re-entering PSE sites across 2 tables. Additionally, the Active Partners chart seems to be asking for summary data of the PSE sites. Can't this be added to the PSE tables?

Questions? Will the Link Projects to SMART Objectives pull over from the plan?

**This section captures process, outcome, and impact results of the SNAP-Ed across the country. It is the heart of the N-PEARS project. The quality of the**

**information and how the features work are critical to the success of the entire system.**

Functionality: There is an incredible volume of detailed data from the year's activities contained in this section of N-PEARS, and these results are to be compared with preliminary info submitted in the SP. Detailed project information from the SP is expected to pre-populate these screens, but until the system is live, this functionality is unknown.

Differences: As with the budget section, it is unclear how differences between data from the SP and AR entries at year's end would be presented to respondents. There are no features in the screens to flag differences between the two or to explain changes. It also is not known if variances would trigger error messages.

Concerns: N-PEARS is based on USDA's original electronic EARS (started in 2008) and the paper SPs and ARs, as well as the more recent PEARS, a separately developed e-system based on EARS for which many SIAs contracted with KSU to use. The USDA data have proven to be too voluminous to use for national reporting in the past.

N-PEARS content: Much of the descriptive info for DE now in N-PEARS has been collected by EARS for over a decade but never tabulated or reported out. Three FNS regions have worked for several years each to aggregate behavioral, site, and PSE results. More recently, PSE info from PEARS has been collected by a large number of states, but there is no public information showing that it can be summarized and reported for multiple states.

A review of the Mockups (seen on the left) shows the volume and specificity of information states are to report in N-PEARS. It is reasonable to ask whether plans and resources are in place at USDA to be sure that N-PEARS produces the intended results?

Supporting Statement-Part A: In its attachment about workload estimates, Item A14 asks for estimates of annualized costs to the federal government. (pages 3-4). The FNS response estimates that annual administration of N-PEARS will require about 1 FTE, and

	<p>development of information collection will require 3 personnel, each of whom would dedicate about 0.25 time, totaling ~2 FTEs/year. Reading on, Item A16 (page 6) about plans for tabulation, and publication and project time schedule reads: <i>“For collections of information whose results are planned to be published, outline plans for tabulation and publication.”</i> The FNS response says: <b><i>“This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.”</i></b></p> <p>FNS has made huge progress in the short period during which funds and personnel have been available at FNS, but the foundations to support this complex new electronic system do not appear to be in place. Without adequate preparation, including participant engagement and pilot testing, I’m concerned that N-PEARS won’t fulfill its statutory purposes.</p>
<b>Evaluation Reports (225-235)</b>	
<p><u>Reports:</u> The name of each evaluation, the ‘project’ with which it’s affiliated, the type (formative, etc.) and completion status are to be entered in a summary page.</p> <p><u>Introduction:</u> For each evaluation, the name; project(s) it is associated with; evaluation type; design; data collection tools (100 words); results and conclusions; and use of results are entered. Entries for details about each become progressively more specific as evaluations progress in complexity through 4 levels, from formative → impact.</p> <p><u>Outcome Evaluation Objectives, Analysis, Results, Conclusions, and Dissemination Plan:</u> Objectives and analytic methods (250 words), number of people in control and intervention groups, pre/post test samples, sample type; additional data collection (100 words); results and conclusions (500 words); written/published reports.</p>	<p><u>Enhance quality, utility, clarity?</u> Allow file uploads for data collection tools and results/conclusions for the 4 evaluation design pages.</p> <p><u>Questions?</u> Outcome Evaluation page is asking for control group data. My understanding was that control group data wasn’t part of this evaluation process.</p>
<b>Challenges &amp; Modifications from Plan (236-238)</b>	
<p>Text boxes of 250 words each are provided to describe challenges, planned modifications of program activities, solutions to prevent/overcome challenges in future.</p>	<p><u>Enhance quality, utility, clarity?</u> Word count is low for these narratives if there are significant modifications or challenges</p>
<b>Executive Summary (245-250)</b>	
<p><u>Success Stories:</u> At least 2 success stories/state or SIA (unclear) especially from PSE or multi-level projects w/ diverse partners toward achieving state’s goals, showing location and project its associated with.</p>	<p><u>Practical?</u> Key Successes has a very short word length for reporting on actual success of meeting plan goals.</p> <p><u>Questions?</u> Where are non-project activities reported on? Why plan on them if we do not report on them?</p>

<p><b>Background:</b> For each, give the title, site/organization, location, name of activity, related <i>Framework</i> indicator(s), types of partners involved.</p> <p><b>The Story:</b> For each story, complete text boxes w/ description (250 words), narrative (500), favorite quotes (150 words), and upload any attachments.</p> <p><b>Key Successes:</b> For each state goal and the SMART objective in each, describe key successes for projects and non-projects on 100-word text boxes associated with each objective.</p>	<p>Where do the Reaching the Target Audience maps come from? Are they generated from data in the plan or elsewhere in the report?</p> <p>Will the narrative sections of the Reaching the Target Audience carry over to the next year's plan?</p> <p>The Mockups may miss the point of the statute for the ES. In the Insight Plan 2.0, the recommendation is that ESs simply include: programs and approaches; reach; progress and coordination; and key accomplishments.</p> <p>Recommendations in the ASNNA Position Paper which focused on the Farm Bill requirement are similar: Background; projects, reach, outcomes and impacts; success stories; amount of the state's SNAP-Ed allocation; and appendices, for a total of 10-20 pages.</p> <p>Since 2020, the federal focus on coordination and collaboration, as well as nutrition security, have heightened. ESs should be able to address new and emerging policy priorities.</p>
<p><b>SNAP-Ed Projects and Activities:</b> SAs are to review SIA success stories and describe in text boxes the range of programming and approaches that were implemented (750 words); reach, in terms of geographic and demographic breadth for DE, PSE, SMC (250 words); and how gaps have been addressed (250 words).</p>	<p>It appears that counterpart sections from the SP will pre-populate the AR, allowing the SA to complete the 3 new text boxes.</p> <p>However, it does not appear that success stories would have this information, so SAs would need to examine the Results, Evaluation, and Challenges sections of SIA ARs to complete this section.</p>
<p><b>Review IA Reports (252-279)</b></p>	
<p>For each of the 7 sections of the AR that each SIA completes (as above), there is an initial and final review screen.</p> <p><b>Initial Review:</b> The SA has detailed screens to use in an initial review; each section is marked as 'reviewed' when completed, and a text box with comments to send as an email to the SIA if changes are requested.</p> <p><b>Final Review:</b> A similar set of screens, possibly populated with changes made by the SIA, is provided for all 7 sections of each SIA's AR. A check box indicates when the SA has completed its review of each section.</p>	<p><u>Enhance quality, utility, clarity?</u> While the page for reviewing IA projects is nice and clean, what will it look like populated with hundreds of project sites, PSE Sites, and Partners?</p> <p><b>Functionality:</b> The SA review process apparently depends upon having access to completed sections of each SIA's AR. It is not clear if each shows content from the SIA's SP and AR, or how to make notes or enter comments about any concerns or compliments. Since the screens are not live, it is not possible to tell what info is provided or how accessible the information is.</p> <p>This section also is difficult to understand b/c the ICR Time Estimates (OMB App H) do not show SAs spending any time on reviewing SIA reports. If it's supposed to be</p>

	done, then it wasn't included in the workload burden estimates.
<b>5. Miscellaneous Mockups (280-281)</b>	
Example error screens are displayed.	
<b>6. Lists (282-291)</b>	
Lists with ID codes for use in the dropdown boxes are provided for: 15 SNAP-Ed agency categories; 24 PSE partner types; 42 PSE setting types; 9 national data sources; 51 indicators in the <i>SNAP-Ed Evaluation Framework</i> ; 138 interventions in the <i>SNAP-Ed Toolkit</i> ; 9 types of state goals.	
<b>7. Changelog (292-296)</b>	
Since the 2022 public comment period, about 60 changes in the mockups have been made on 6 occasions. These include word edits, instructions, radio buttons, and sequencing. (This is where it's noted that USDA will not pre-populate the Needs Assessments with the SNAP-Ed-eligible demographics for people w/ incomes <185% FPL. This is difficult info to calculate, and it was expected that providing it centrally provide standardization and reduce workload, especially for smaller states.)	The list entered here may not capture all important changes that were made since last year's wire frames.
<b>Appendix H – New Burden Narrative (71 pages, 2/28/23)</b>	
<p>Among ASNNA concerns last year was the accuracy/validity of workload burden estimates that USDA cited. In response, the OMB package discusses burden in several places: <a href="#">Appendix H</a>, below, itemizes the time needed for entering data for each section of the SP and AR, broken out for SAs and 4 SIA types for the 4 different state groups, A-D. <a href="#">App J</a> provides a narrative about different aspects of the burden, lists the states in each burden group, and describes the 'consultation process' w/ 8 states. <a href="#">Appendix K</a> has Excel tables for reporting and recordkeeping for the 4 state groups. <a href="#">Supporting Statement, Part A</a>, discusses burden in Sections A12-A13.</p> <p><i>Questions: How well do the burden hours and salary ranges correspond with SIA estimates in each state grouping category? (Personnel classifications and costs are shown in ICR, above. Methodology for state groupings is outlined in Appendix J, below.)</i></p> <p><b>There are 2 Approaches:</b> Use the <b>ASNNA Feedback</b> form of 3/23/23 to agree/disagree w/ USDA's time estimates. If you're able to calculate costs for you own agency, use the <b>Excel spreadsheet</b> that WY developed; it was Attachment 1 in email of 3/21/23.</p>	
Burden estimates are broken out separately for each section of the State Plan and Annual Report for each of 4 state groupings (Groups A-D), for each of 5 agency types (SA and 4 IA types – state govt, local govt, tribal, non-profit).	<p><b>Group A:</b> ME, MS, WV, KS,* NE, DC, WY, UT,** RI, ID, DE, MT, ND, NH, SD, VT, GM, VI</p> <p><b>Group B:</b> CT, OK, LA, TB, CO, AZ, OH, MO, SC, AK, AR, IA, HI, NJ, OR,** VA, MD, IN, AL</p> <p><b>Group C:</b> MI, FL, PA,* NC, WI, NV,* MN,* NM, MA, GA, WA, KY, IL</p> <p><b>Group D:</b> CA, NY,* TX*</p> <p><b>Legend:</b> Green = ASNNA Team; * = consulted w/ USDA on burden estimates.</p> <p>Unclear if the burden estimates are for one FTE.</p>

	Burden estimates for learning the new system, data collection, planning, data reporting, aggregations, and analysis is not captured here and is significant - perhaps doubling these numbers especially in the first 2-3 years.
<b>Plan:</b> Needs Asst, Action Plan, Planned Projects, Planned Evaluations, Coordination & Collaboration, Staffing & Budget, Assurances, Reviews & Approval, Amendments.	SAs are unlikely to have capacity for the hours outlined, meaning that these hours likely would shift to SIAs.
<b>Report:</b> ES, C&C, Financial Reporting, Project Results, Evaluation Reports, Major Challenges, Success Stories, Stakeholder Comments, Review & Approval.	For FY23, burden is significantly underestimated because data will not be linked to an FY23 plan in NPEARs.  FY23 reporting by project may require some states to retroactively consider project specific budgets and reporting based on NPEARS interpretations of the term project.  Reporting estimates for the report are low based on experience.
<b>Personnel:</b> Are the personnel classifications, pay scales, and time allocations realistic?	
<b>Appendix J – Supporting Statement Section A8 – Comments to Federal Register and Efforts for Consultation, including Burden Estimates</b> (25-page narrative; 3/1/23) This is the feedback that we’ve been asking for from last summer’s public comment cycle! <i>Questions: How does the new N-PEARS package address each of the issues that ASNNA commented about last summer? If other new issues have arisen, what are they?</i>	
USDA cites and responds to these <b>selected issues</b> from the public comments: <ul style="list-style-type: none"> <li>▪ <b>Burden estimates:</b> USDA says burden of needs asst will decrease in subsequent years and, being done only q 3 years, will even out and be available in future years, lessening workload. Cites pre-populating fields in SP (demographics from ACS); SNAP ppn (from USDA); state plan, projects from prior year; drop-downs; Excel template to import budget. Concerns like functionality <i>‘will be considered.’</i></li> <li>▪ <b>Labor categories:</b> FNS revised its approach.</li> <li>▪ <b>Reco for N-PEARS delay:</b> Reco was to delay e-forms 1 year to review public comments and work with states to adapt and test modules, model key reports and graphics, complete a formal rollout plan, and get realistic workload estimates. <i>‘Will take reco ...into consideration and share Agency’s decision w/ stakeholders once finalized.’</i></li> </ul>	The google file has a highlighted copy of USDA’s narrative Appendix J document in which the topics are highlighted in blue, commenters’ concerns highlighted in yellow, and FNS responses highlighted in green.  ASNNA’s original comments are shown on the ASNNA website under Advocacy.  <b>Burden estimates:</b> USDA burden estimates appear to be incomplete as they are only for data entry, not for the time and cost needed to align existing data collection systems and stand up a new electronic system. Regarding the data entry workload burden, see Appendix H, above.  <b>Labor categories.</b> The labor categories appear insufficient for states and SIAs to repurpose their existing data systems and stand up the new N-PEARS. Only 2 classifications – technical and managerial – are shown. These classifications do not include senior



- **Insufficient time for reviewing package:** Agreed that time to review new drafts and burden was limited, but ‘no ideal time’ and ‘PRA specifies 60 days as the amount that agencies must provide to the public...’
- **N-PEARS access, collaboration between SAs and IAs:**  
In response to comments, FNS adjusted system to allow IAs default view-access to Needs Asst and Action Plan Sections, plus SAs can grant write-access to IAs or other to help input data; multiple staff can access and enter data.  
Section A adjusted for workflow, e.g., SAs enter goals and objectives, generating tables P2.2a and P2.2b automatically. Section 3 allows connecting each project to 1 or more SMART objective in table P2.1.
- **Form design, data entry, functionality:** Concerns were about workload for manual data entry vs being able to upload tables and other docs, word limits, auto-populating PEARS into N-PEARS, having draft versions of e-reports to work on before entering in N-PEARS, being able to generate tables that could be repurposed into grant applications, auto populate maps w/ uploads of state-level map about community food access. FNS listed 9 sections in SP and AR that allow for files to be uploaded. States that ‘*developers are continuing to look for functionality to reduce burden and improve user experience*’ and ‘*will take above comments into consideration*’.
- **Form content:** Comments recommended rewording, removing fields, clarifying project language, simplifying budget section; requiring AR before SP is irrelevant for understanding program and impact, unreasonable and burdensome, plus not enough time this year. Reco that ES focus on key measurable outcomes; graphics emphasize synergies; maps display combo approaches and com’y coverage.
- **Needs assessment:** Recommendation for qualitative focus, including com’y engagement and needs ass’t be relevant to SP. Demographic data unnecessary and burdensome; ‘check the box’ is limiting and doesn’t involve ppn and com’y-based input; model is limiting and should include other variables for health behaviors; not all states prepared to conduct such in-depth assessments; decreases intervention opportunities; community voices are nowhere.

nutrition, evaluation, IT, and scientific staff. The pay scales appear low.

**Delay N-PEARS Implementation:** Since FNS is moving ahead in FY 2023, FY 2023 - FY2025 should be seen as a pilot/field test period within which FNS will work collaboratively and inclusively with ASNNA and multistate workgroups to develop short and long range plans as laid out in FNS Action Plans (C1, C2). Pilot testing should be very intentional, specific, open, and iterative with feedback looks and decisions accompanied by written rationale.

Since Federal Register comment periods are often extended past 60 days, it’s surprising that something as important, pricey, sensitive, and unchangeable as new reporting systems would be limited to 60 days b/c they are in PRA jurisdiction.

**Insufficient time for reviewing Federal Register package:** It is very disappointing that so many constructive recommendations were not incorporated into the Mockups. States want their abundant outcome and impact results to be captured, reported nationally, and worked with as part of a national solution, rather than to have SNAP-Ed always being questioned.

We share the urgency of adhering to the 2018 statute and appreciate the planning contracts that were let with Policy Insight Research (App C1 and C2). However, the 2018 mandates were not funded until FY2021, and national staff were not on board until FY2023, so time to work with states on planning, development, testing, revision, and so forth has been insufficient. The scope, complexity, and impact of this important program component requires inclusive and transparent input by all partners.

**Collaboration:** It appears that N-PEARS now allows SAs to provide SIAs with simultaneous access to the Needs Assessment and SP segments, but it is not clear if this is an active (permission required), or an automatic process, and how this will work in practice, especially in states w/ multiple SIAs, is not knowable until the system is live.

**Form Design, etc:** Some of these suggestions are being developed such as Excel files to upload PEARS data into

<ul style="list-style-type: none"> <li>▪ <b>‘Projects’ and budgets:</b> The very urgent recommendation to drop the duplicative task for also showing budgets for each ‘project’ was not adopted; no rationale was offered, nor was the use of this information explained. There was no response to concerns about the nature and volume of data in needs assessments and PSE sites, or to questions about how info would be used or why it is necessary to collect.</li> <li>▪ <b>Evaluation:</b> Recommendations to adjust options for data collection methods, update sub-indicators/metrics in the SNAP-Ed <i>Framework</i>, and explain if Framework data are reported part of the Annual Report.</li> <li>▪ <b>Social marketing:</b> Concern about data for large market segments in order to assess reach.</li> <li>▪ <b>Ease of use:</b> Instructions and prompts vague or confusion; definitions w/ training, glossary; office hours; skills needed to manipulate large secondary data sets. .</li> <li>▪ <b>Aids and TA</b> developed/planned (needs assessments, visualization, maps).</li> <li>▪ <b>Other topics</b> ‘will be taken into consideration’, i.e., <i>Framework</i> as a ‘living doc’; skills needed to manage data; online access.</li> </ul>	<p>N-PEARS, but are not yet available. Other such improvements are unclear.</p> <p><b>Form Content:</b> Time did not permit a detailed review of changes, but the very important recommendations about budgeting-by-project and clarifying the metrics associated with <i>Framework</i> indicators were not addressed.</p> <p><b>Needs Assessment:</b> The 2 FNS needs assessment guidance documents (Toolkit and Data Collection Template User Guide) released in December 2022 and January 2023 are even more detailed and quantitative. Recommendations for including data that are modifiable by SNAP-Ed (so needs assessment is usable for tracking progress over annual cycles) is not addressed. The consideration of how community engagement and stakeholder participation contributed to the SP remains minimal in N-PEARS.</p> <p><b>‘Projects’:</b> Time was insufficient to verify against the 2022 wireframes, but it appears that the requirement to specify names and addresses of all PSE sites in the SP was dropped. However, the extreme concerns about developing duplicate sub-budgets were not. It is true that statute requires outcomes and impacts for each project, but it does not require budgets on each.</p> <p><b>Evaluation:</b> No responses.</p> <p><b>Social Marketing:</b> No response.</p> <p><b>Ease of Use:</b> FNS will provide intensive training and TA; planning a ‘community of practice working group; continuing to look for functionality.</p>
<p><b>Burden estimates and allocation</b> (page 8) based on consultation from 7 SAs and 1 SIA. Describes methodology for assigning ‘grouping value’ to categorize states Groups A-D, namely funding level and number of IAs.</p>	<p>Describes how 4 state groupings were selected, the 8 states that FNS allocated and detailed burden estimates, including the difference between EARS and N-PEARS. These estimates appear to be only for data entry. Since SAs and not SIAs input EARS data, SIAs have not previously done EARS entry, so all N-PEARS entry will be new workload. The Burden estimates cover only data entry, not time to obtain and organize info for entry.</p>
<p><b>ASNNA concerns</b> last summer:</p> <ul style="list-style-type: none"> <li>▪ Timeframe for development and implementation</li> <li>▪ Necessity and utility of so much information</li> </ul>	<p>These concerns remain largely not addressed.</p>

<ul style="list-style-type: none"> <li>▪ ‘Projects’ – definition and separate budgeting</li> <li>▪ High burden for data entry</li> <li>▪ Quality, utility, clarity of shifting so much program content to SAs.</li> </ul>	
<p><b>ASNNA Recommendations</b> last summer:</p> <ul style="list-style-type: none"> <li>▪ Develop pre-populated needs assessment w/ mixed methods;</li> <li>▪ Provide reports back to SAs/SIAs for in-state use;</li> <li>▪ Conduct inclusive, transparent demo’s and pilot projects to test outputs prior to formal field testing and nationwide roll-out.</li> </ul>	<p>In the OMB Comments for April 6, our team suggested that ASNNA comments and recommendations address 3 timeframes as much as possible:  Immediate/Near-term = calendar 2023.  Short-term = the first OMB cycle should be defined as including ‘pilot testing’ and development of a long-term roll-out plan for full-blown implementation. Could be 2 or 3 years.  Long-term = 2<sup>nd</sup> OMB cycle.  An option could be to recommend that the first approval period be 1-2 years (FY2024-2025), not 3 years, which is the max.</p> <p>Note: App C1 and C2 recommended ‘near term’ (before implementation) and ‘longer term’.</p> <p>Last year, ASNNA recommended delayed implementation and transparent, inclusive planning processes w/ states/ASNNA.</p>
<p><b>Appendix K – New Estimates of Hour Burden</b> (8 Excel spreadsheets/groups A, B, C, D; 2/28/23)  <i>Questions: How well do the burden hours and salary ranges correspond with SIA estimates in each state grouping category? Methodology is outlined in Appendix J, above.</i></p>	
<p><b>Burden spreadsheets/tables</b> summarize calculations for reporting and recordkeeping in Appendix H, Burden Narrative. <i>See Appendix J for names of states in Groups A-D.</i></p>	<p>It is not clear that reviewing these spreadsheets will provide any new info.</p>
<p><b>App. I – New Public Comments of 8/9/22 &amp; 2/27/23 (ASNNA)</b> 3/7/23  <i>Questions: Which public comments were addressed and what were reasons that many/most of ASNNA’s were not? (All links to the 10 representative comments and the 10 USDA responses are corrupted, so this info is not available. Links will not be repaired before April 6.)</i></p>	
<p>10 ‘representative’ comments from the 83 comments posted last summer were listed w/ the FBS response for each. However, all 20 files were corrupted, so we do not know which comments were selected or how NEB responded to each, nor do we know what other issues were raised but not addressed. (To read the original public comment, one can go back to August 2022 and find authors in Regulations.gov. Names of authors are shown on the face page for the ICR documents docs.)</p>	<p>NEB requested OMB to repair the 20 corrupted files, but OMB could not do so before April 7. NEB indicated that the FNS responses were the form letters that all commenters received. If all FNS responses were form letters, except possibly the one to ASNNA dated 2/27/23, it is unclear what value they would have had.</p>

Unclear what the ASNNA consultation dated 2/27/23 is (App I4).	
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