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Aurora Calvillo Buffington
Food and Nutrition Service
Supplemental Nutrition Assistance Program
Program Administration and Nutrition Division
1320 Braddock Place, 5th Floor, Alexandria, VA 22314

Dear Dr. Buffington:

This comes in response to the call for public comment on the proposed Agency Information Collection Activities: Proposed Collection; Comment Request-Supplemental Nutrition Assistance Program Education (SNAP-Ed) Intervention Submission Form and Scoring Tool. These are FNS-886 and FNS-885, respectively.

I would like to start by affirming my strong endorsement of the detailed recommendations that ASNNA has prepared. As always, ASNNA pulled together a representative team to respond to questions in the Federal Register and provide its views as a partner with FNS in constantly looking ahead for ways for the program to excel and grow to address the country's unmet needs.

The comments below are based on my experience founding and leading California's large Food Stamp Nutrition Education/SNAP-Ed program in the California Department of Public Health from 1996-2014; co-founding the Association of SNAP Nutrition Education Administrators (ASNNA) in 1998; and co-leading its Evaluation and Advocacy Committees before and during retirement. Relative to the *Toolkit*, the experience from which I drew my conclusions includes:

- **Building the *Toolkit*:** Helping the USDA Food and Nutrition Service (FNS) staff who predated the Nutrition Education Branch with the *Toolkit*. For 2 cycles, ASNNA solicited entries from State Implementing Agencies, established scoring criteria, conducted the peer review scoring process, and recommended entries to FNS.
- **Building the *SNAP-Ed Evaluation Framework*:** Working closely with the Western Regional Office on the first edition of the *SNAP-Ed Evaluation Framework and Interpretive Guide* (2017). That included the understanding that USDA and ASNNA would work together to add/refine metrics, either systematically or in future editions, as the science and practice advance. ASNNA's proposed *Framework 2.0* project would do so.
- **ASNNA Nationwide Census on Use of the *SNAP-Ed Framework*:** Helping to found and co-lead ASNNA's biennial national censuses (2017-2023) on use of the 51 *Framework* outcomes by State Implementing Agencies (SIA) and for all SIA's in each state. We have authored 3 published papers so far.

- **2018 Farm Bill:** Helping ASNNA develop its 2020 position paper that contains recommendations for implementing 2 new requirements relevant to the *Toolkit*, namely an online information clearinghouse and technical assistance.
- ***Toolkit*, SNAP-Ed Resource Library, SNAP-Ed Framework, and the National Strategy on Hunger, Nutrition, and Health:** Helping with an ASNNA project that examined the interface between the *Toolkit*, the 51 *Framework* Indicators, and the 5 pillars of the *National Strategy*, as well as evaluation instruments in the SNAP-Ed Resources Library (enclosed).
- **Advocacy Materials:** With adverse feedback from some in Congress, ASNNA has retrieved and posted evidence that SNAP-Ed works proactively and responsively in the states. We have recounted SNAP-Ed results in our policy materials and made over 350 State Impact Reports and Infographics from the states accessible on our website.

To build a *Toolkit* that will meet the needs of all SNAP-Ed agencies – new, smaller, and experienced SIAs – other users, and advocates for the people SNAP-Ed serves, 3 strong, topline recommendations jumped out at me. I hope they will be helpful in the 2024 revision:

First, support innovation and responsiveness to local/state conditions. Assure that the criteria for submission and scoring – as well as the backgrounds of reviewers who score the submissions – foster new, creative, and inclusive program development. The *Toolkit* content should do more to encourage ‘emerging’ interventions that in their design and evaluation draw from multiple real-world sources and relevant interdisciplinary evidence. SNAP-Ed practice does not require detailed ‘protocols’ or ‘interventions’ but rather it needs cutting-edge information about approaches and strategies that work in practice. Since SNAP-Ed depends on dynamic, collaborative relationships with community residents and organizational partners who have autonomy over their activities and time, it cannot prescribe formulaic interventions. Rather, SNAP-Ed can bring people and efforts together to develop activities that are mutually agreeable. This can bear amazing and lasting results that should be captured in the *Toolkit* and in N-PEARS, qualitatively and over time.

Second, focus more heavily on big-picture and sustainable ‘upstream’ change. A 2024 assessment (attached) found that, even though the ASNNA Census shows that across the country all 51 outcomes in the *SNAP-Ed Framework* are being addressed, the *Toolkit* falls short of interventions, approaches, and strategies to support over two-thirds of them. To fill this gap, the revised *Toolkit* submission forms and scoring criteria should favor those beyond the 7 USDA ‘priority indicators’ and focus on 3 shortfalls: long-term indicators, those in Multiple Sectors of Influence, and Population Results at city, county, regional, and state levels. Submissions should signify the number of each Framework Indicator for which outcome results were monitored. This will improve the ‘search’ functionality of future *Toolkit* and more easily capture examples that are being missed in telling the story of SNAP-Ed results across the country.

Third, solicit interventions, approaches, and strategies that address food and nutrition security. Even as rates of food insecurity stayed high or rose and policy attention on the health implications grew, SNAP-Ed was discouraged from working with SNAP and other nutrition

assistance programs on food security. It is shocking to find only 3 entries each for food security and dietary quality in the Population Result outcomes section of the *Toolkit*.

In conclusion, it would help the program tremendously if the *Toolkit* were to become a go-to resource for real-time interventions, approaches, and strategies that are responsive to state and national policy concerns, which now it is not. Submissions would be ongoing, and reviewers would be chosen from representative practice backgrounds and geographies. I encourage FNS to again work cooperatively with ASNNA, the primary community of *Toolkit* contributors and users. Starting with sharing these public comments and planning together, working as a partner with ASNNA on *Toolkit* operations would better keep up with the diverse and changing needs of practitioners. The broader focus and purpose of the *Toolkit* might warrant a new name, and categories of 'promising practices' could become highlights.

Thank you for considering these suggestions.

With best regards,

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Enc:

Interventions, Evaluations and Success Stories
for Framework Indicators
Identified Using Search Features in USDA's Electronic Clearinghouses:
SNAP-Ed Toolkit and SNAP-Ed Connection Library
January 20, 2024