

From: [Susan Foerster](#)
To: [SNAP-Ed - FNS](#); [Calvillo Buffington, Aurora - FNS](#)
Subject: [External Email]Re: Agency Information Collection Activities: FNS Forms 925A and 925B , OMB Number: 0584-0683
Date: Tuesday, November 4, 2025 5:40:42 PM
Attachments: [image001.png](#)
[image002.png](#)
[Screenshot 2025-11-04 at 2.17.31 PM copy.png](#)
[SNAP Ed Makes Am Healthier 6-2025 .pdf](#)
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Please use this copy. The earlier version did not display the attached abstract properly.

Thank you.

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These comments are submitted in response to USDA's Federal Register notice of Sept. 3, 2025

requesting comments on the revision of the Annual Report and State Plan forms used for the electronic National Program Evaluation and Administrative Reporting System (NPEARS). These comments are intended to complement the detailed information and recommendations that were submitted by the Association of SNAP Nutrition Education Administrators (ASNNA). Even if SNAP-Ed as a program is not reinstated, NPEARS is important. It is a unique and pioneering effort to use e-reporting and could be applicable to other large, complex, diverse public health nutrition programs that USDA runs when results beyond counting meals served or dollars spent are needed for policy purposes.

I am submitting the peer-reviewed abstract, *Advancing SNAP-d evaluation: Developing practical e-metrics for community impact reporting* ([Attachment 1](#)) which is being presented this week at the American Public Health Association. It is relevant to any revision of FNS 925A and 925B. This is what it shows:

Left side: This background information is an Introduction to the SNAP-Ed Evaluation Framework itself. It includes the purposes of the Framework and provides an image that shows the 51 multi-level indicators. It summarizes the methods and data sources that ASNNA used starting in 2017 to track, assess progress, and identify updates that would improve its utility for practitioners and for reporting to funders. In the early teens, the Framework was developed to capture outcomes from across the country. It was adopted by USDA and rolled out in 2017, and then used for state plans (FNS 925B) ever since. While the two federal reporting systems – EARS (starting about 2010) and NPEARS (starting in 2023 – were not designed around the Framework, practitioners tried to use the 51 indicators with their associated metrics for electronic reporting.

Originally the Framework was developed as a joint state/federal effort, but after the national adoption in 2017, USDA did not conduct any further development or updating. Therefore, practitioners undertook a series of activities to do so. These included biennial tracking of Framework usage, multiple peer work groups focusing on groups of indicators, two all-ASNNA conferences, and a number of structured study groups. Since e-reporting through NPEARS started in 2023, we began focusing not only on updating the metrics but also on finding those that would lend themselves to e-reporting. ASNNA's methods included several structured input processes with a broad cross-section of practitioners to identify ways that the metrics could be improved. More qualitative methods were used to identify the characteristics that any updating process should have to assure that resulting metrics were practical, valid and reliable measures of change in the hands of practitioners.

Right side: This summarizes results of the multiple projects and recommendations. The abstract shows that practitioners identified 8 themes to improve the indicators and metrics. These included clarity, measurement characteristics, alignment among the categorical programs with which SNAP-Ed interfaces, a focus on outcomes and impacts, greater focus on the results of partnerships, and the use of qualitative data that could be aggregated, not solely quantitative. When assessing the success of interventions, practitioners wanted to

have measures that reflected factors critical to long-term sustainability. And in any updating process – such as that being considered for FNS 925A and 925B – practitioners wanted an open, collaborative and inclusive process that focused on policy-relevant results, was dynamic and flexible, and was rolled out thoughtfully, with transparent pilot testing and critical analysis.

In Conclusion: The NPEARS system has incredible potential to support and improve the work of both states and USDA. However, it must do much better at working with the practitioners in states to generate mutually important reports of nationwide outcomes, as ASNNA was able to do quickly in its analysis, SNAP-Ed Makes America Healthier ([Attachment 2](#)). A principal reason that Congress cancelled SNAP-Ed funding was the lack of any USDA reports of national results. If these forms are revised, the process will be successful only if it's collaborative with the states and practitioners who are working in the community. Otherwise, thousands of hours will continue to be wasted on unnecessary administration to collect information that is not useful and diverts thousands of hours from services to the public.

Respectfully submitted,

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Advancing SNAP-Ed evaluation: Developing practical e-metrics for community impact reporting

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Introduction

What is SNAP Education (SNAP-Ed)?

- Largest nutrition education and promotion program in the US (prior to funding elimination in July 2025)
- Nation-wide, community-driven approaches
- 23,000+ sites and 11,700+ community partners
- Combines direct education, social marketing, and policy, systems and environmental change to create multi-level, collective impact
- **A pillar of the US public health infrastructure**

Challenges

- Pressure to demonstrate results to Congress
- Demonstrate aggregate program results nationally
- Development of meaningful e-metrics for large-scale programs

SNAP-Ed Evaluation Framework

- Captures upstream and downstream public health outcomes.
- 51 indicators (& sub-metrics) for all levels of the social ecological model
- Connects sector- and organizational-level outcomes to individual behavior and population results
- Used nationally since 2016
- Electronic reporting system (2023) enabled development of some e-metrics from Framework indicators

	Readiness & Capacity Short Term (ST)	Changes Medium Term (MT)	Effectiveness & Long Term (LT)	Population Results (R)
	GOALS AND INTENTIONS	BEHAVIORAL CHANGES	MAINTENANCE OF BEHAVIORAL CHANGES	TRENDS AND REDUCTIONS IN DISPARITIES
Individual	ST1 Healthy Eating ST2 Food Resource Management ST3 Physical Activity and Reduced Sedentary Behavior ST4 Food Safety	MT1 Healthy Eating* MT2 Food Resource Management* MT3 Physical Activity and Reduced Sedentary Behavior* MT4 Food Safety	LT1 Healthy Eating LT2 Food Resource Management LT3 Physical Activity and Reduced Sedentary Behavior LT4 Food Safety	R1 Overall Diet Quality R2 Fruits and Vegetables* R3 Whole Grains R4 Dairy R5 Beverages R6 Food Security R7 Physical Activity and Reduced Sedentary Behavior R8 Breastfeeding R9 Healthy Weight R10 Family Meals R11 Quality of Life
Environmental Settings	ORGANIZATIONAL MOTIVATORS	ORGANIZATIONAL ADOPTION AND PROMOTION	ORGANIZATIONAL IMPLEMENTATION AND EFFECTIVENESS	
	ST5 Need and Readiness ST6 Champions ST7 Organizational Partnerships*	MT5 Nutrition Supporter MT6 Physical Activity and Reduced Sedentary Behavior Supports	LT5 Nutrition Supports Implementation LT6 Physical Activity Supports Implementation LT7 Program Recognition LT8 Media Coverage LT9 Leveraged Resources LT10 Planned Sustainability LT11 Unexpected Benefits	
Sectors of Influence	MULTI-SECTOR CAPACITY	MULTI-SECTOR CHANGES	MULTI-SECTOR IMPACTS	
	ST8 Multi-Sector Partnerships and Planning*	MT7 Government Policies MT8 Agriculture MT9 Education Policies MT10 Community Design and Safety MT11 Health Care Clinical Community Linkages MT12 Social Marketing MT13 Media Practices	LT12 Food Systems LT13 Government Investments LT14 Agriculture Sales and Incentives LT15 Educational Attainment LT16 Shared Use Streets and Crime Reduction LT17 Health Care Cost Savings LT18 Commercial Marketing of Healthy Food and Beverages LT19 Community-Wide Recognition Programs	

* Priority indicator

View the Framework online!

Methods

Data sources:

- Biennial census of all implementing agencies (fall 2024)
- ASNNA (Association of SNAP Nutrition Education Administrators) evaluation committee workgroup survey
- ASNNA conference work sessions
- Administrative program data

Acknowledgements

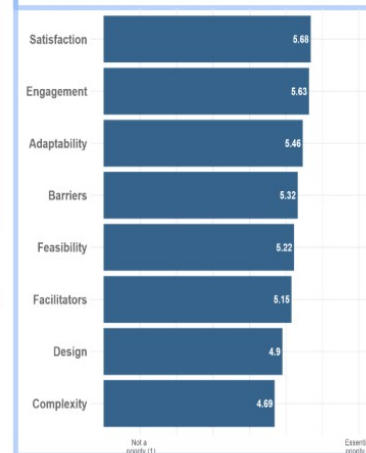
SNAP-Ed is funded by USDA SNAP. Thank you to Julia Pangalangan, PhD, for assistance with data analysis

Results

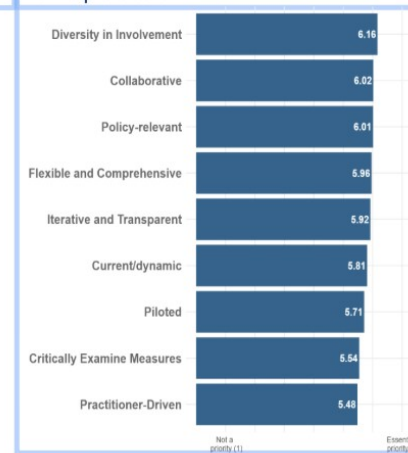
How can Framework indicators and metrics be improved?

Theme and Description	Examples
Improved clarity needed Many indicators described too vaguely or broadly, making it difficult to interpret, measure, or aggregate across states. Need for clearer thresholds, definitions, and consistent language.	"This indicator is not clear enough to decide on its importance... what are we (LT10: Planned Sustainability)"
Feasibility and measurement challenges Concerns about self-report bias, difficulty measuring short-term behavior change, and lack of practical or validated tools for consistent data collection.	"Valid and reliable data on physical activity is difficult to collect... existing too confusing for folks." (MT3: Physical Activity)
Aligned measurement with other programs Importance of standard tools and measures for comparability across states and alignment with existing national surveys (e.g., BRFSS, YRBS, DGA updates).	"Questions should align with national surveys so SNAP-Ed rates can be compared to population segments." (MT3: Physical Activity)
Emphasize outcomes and impact instead of counts Several indicators (especially PSE-related) seen as "counting widgets" without showing depth, quality, or real-world impact.	"This feels a lot like counting widgets without any outcome information associated." (Nutrition Supports Implementation)
Equity, cultural relevance, and asset-based approaches Benefit of incorporating culturally relevant, asset-based measures that reflect community strengths rather than deficits.	"If SNAP-Ed can have initiative to create culturally relevant healthy eating measures, other health & nutrition programs will use that." (MT1: Healthy Eating; LT1: Healthy Eating)
Role of partnerships and multi-sector work Indicators related to partnerships (ST7, ST8, LT12, LT16) highlight the value of collaboration but could be improved.	"Coalitions are vital to SNAP-Ed work but the work of the coalition... feels more like a composition of the coalition." (ST8: Multi-Sector Partnerships and Planning)
Importance of storytelling and qualitative data Some indicators could be better leveraged to share community voice/impact.	"Unexpected benefits... could be one of the most consequential [indicators] for fully understanding the impact of SNAP-Ed." (LT11: Unexpected Benefits)
Fit between SNAP-Ed scope and Framework indicators Some indicators viewed as beyond SNAP-Ed's realistic scope or influence.	"Educational attainment is very poorly described... unattainable under SNAP-Ed conditions." (LT15: Educational Attainment)

Are implementation indicators needed?



What process should be used for updates?



Conclusions

The SNAP-Ed Evaluation Framework

- **Is effective at demonstrating program outcomes** in some areas for growth and improvement to reflect best practices in public health
- **Is practitioner-driven and field tested**
- **Is a comprehensive model to inform public health**

E-metrics, Generally

- Help communities and practitioners establish and test environmental, organizational, social, and marketplace conditions: *fundamental functions of public health*
- Indicator development should include community and practitioner voice
- Few practical e-measures are available to inform program in real time
- Process and implementation metrics are important

See how e-metrics were used to communicate national impact



SNAP-Ed Makes America Healthier



SNAP-Ed, the national **Nutrition Education and Obesity Prevention Grant Program**, empowers **Americans across the lifespan in all 50 states, DC and Guam** to spend wisely, eat healthy, and be physically active to prevent diet-related chronic disease. The program **supports community partners** to make healthy choices easy and accessible in low resource locations and directly aligns with the national agenda for health. **The House budget repeals the national SNAP-Ed program in Section 10011, eliminating a program proven to help American families and communities stretch food dollars and make healthy choices.**

SNAP-Ed Delivers Results

National Reach

through nutrition education classes

Over 2 million

Americans

23,300+

Program Sites

33%

Rural Sites



40%

improvement in fruit intake



34%

improvement in vegetable intake



41%

improvement in shopping behaviors



23%

improvement in physical activity



The class has **changed the way I look at food and shop**. It is very helpful to understand the back of package labels, especially as a diabetic. Also, the vision of MyPlate to understand portion is very beneficial.



SNAP-Ed Participant, Northeast

SNAP-Ed Builds Healthy Communities

National Reach

through community collaborations

Over 10 million

Americans

11,700+

Community Partners

SNAP-Ed works with partners to make lasting organizational changes so healthy choices are easier. Most often, these are **school/early childhood, agriculture, healthcare, recreation, and food pantry** partners.

Access to fresh, locally-grown produce impacts our community in many ways. It **allows our community to interact with local producers...** They learn about how to grow and prepare healthy food. **Local farmers are connected to a new market, and we contribute by increasing access to healthy foods.**



Food Policy Council Partner, Southeast



Top Partner Collaborations



- Promoting locally farmed foods to increase food security
- Making gardens and physical activity facilities more accessible
- Placing community signage to prompt healthy choices
- Conducting workforce training to extend healthy changes

SNAP-Ed Yields Returns on Investment



A recent state-level study showed for every \$1 spent, SNAP-Ed returns at least \$5.36 in future health and economic benefits from:

- health care savings
- educational attainment
- lifetime earnings
- life expectancy

"I have made a concerted effort to eat healthy whole foods from MyPlate...as well as looking for ways to be more active. Due to this, I have **lost 10 pounds** since this class started and it's all because of the information that you give us."

SNAP-Ed Participant, Midwest

"I just had my A1C checked. It was 9.9 and my blood sugars were running 300-500. I was put on insulin shots. While taking this class, I have been walking more, watching nutrition labels, and cooking healthier. **My blood sugars are now under 200, down to 105 most of the time.**"

SNAP-Ed Participant, Mountain Plains

SNAP-Ed Extends Reach, Reduces Duplication

SNAP-Ed strategically aligns with federal programs and local partners to **maximize reach, expand services** and **eliminate duplication**. In rural and urban communities, SNAP-Ed collaborates with partners to reach Americans where they live, learn, eat, shop, work, and play. SNAP-Ed also employs **social marketing campaigns** to encourage healthy eating and active living through behavior-changing messages.

National Reach

through social marketing

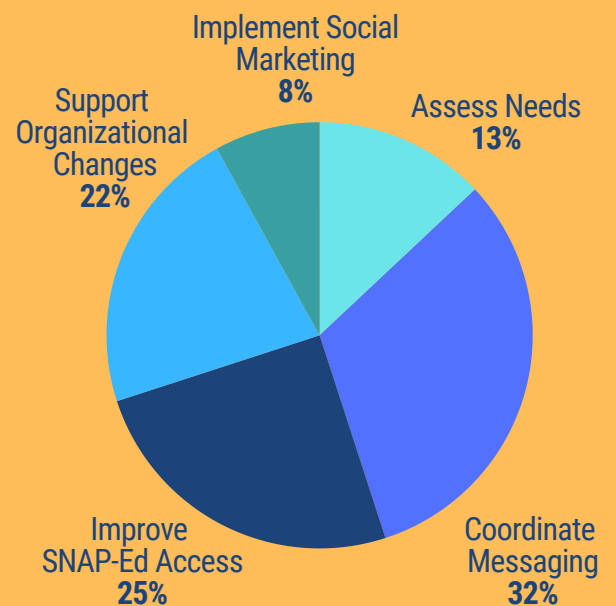
Over 1.8 billion

Impressions

“The work you do to **connect growers with these state and federal offices is integral to the sustainability of these food access programs**. Without someone like you encouraging these collaborations to happen, local foods' reach would be minimal.”

Farmers Market Manager Partner, Western

SNAP-Ed Coordinates with Nutrition Education and Obesity Prevention Services



SNAP-Ed Measures Impact

In FY2023, SNAP-Ed launched a new electronic national reporting system (NPEARS) in response to a 2019 GAO report of USDA's nutrition education programs. The new system compiles national data for improved data consistency, accountability, and measurement. This allows the program to capture impacts from the SNAP-Ed Evaluation Framework (est. 2017). SNAP-Ed is positioned as an evaluation leader among USDA nutrition education programs, with bolstered capacity to quantify and communicate its effectiveness and outcomes across the country.

NATIONAL
NPEARS



This report includes data summarized from SNAP-Ed state and implementing agencies contributing FY2024 data to ASNNA as of May 2025 (representatives from 45 states). For more information, contact ASNNA at info@asnna.us.org or visit asnna.us.org