

**From:** [Calvillo Buffington, Aurora - FNS](#)  
**To:** [Pendleton, Divyani - FNS](#)  
**Subject:** Fw: [External Email]NPEARS Comments  
**Date:** Thursday, November 13, 2025 7:24:26 AM  
**Attachments:** [SPARS Public Comment ASNNA .pdf](#)

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Hi Div, FYSA.

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**From:** Leadership ASNNA <leadership@asnna.us.org>  
**Sent:** Tuesday, November 4, 2025 10:51 AM  
**To:** SNAP-Ed - FNS <SNAP-Ed@usda.gov>; Calvillo Buffington, Aurora - FNS <Aurora.CalvilloBuffington@usda.gov>  
**Subject:** [External Email]NPEARS Comments

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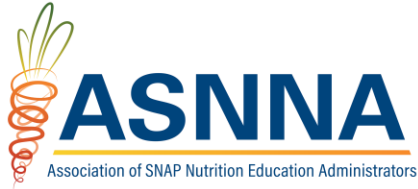
Good morning  
Please accept the following as a response to the request for public comment on NPEARS.

Kindly  
Gina Crist  
Senior Co-Chair  
Association of SNAP Nutrition Education Administrators (ASNNA)

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webpage: [asnna.us.org](http://asnna.us.org)



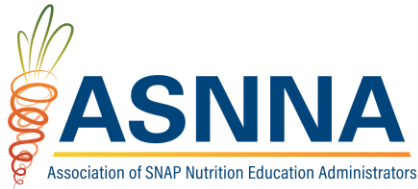
To: Aurora Calvillo Buffington  
Food and Nutrition Service  
U.S. Department of Agriculture  
Supplemental Nutrition Assistance Program

November 4, 2025

Dear Dr. Calvillo Buffington,

The Association of SNAP Nutrition Education Administrators (ASNNA) is taking the opportunity to submit comments on the **Supplemental Nutrition Assistance Program Education and Obesity Prevention Grant (SNAP-Ed) State Plan and Annual Report System (SPARS)**, previously NPEARS. ASNNA was established in 1998 as the all-volunteer national professional organization representing SNAP-Ed programs. Now established as a non-profit, ASNNA includes members from the 160+ Implementing Agencies (IAs) that run SNAP-Ed programs in all 50 states, the District of Columbia and the Territory of Guam under contract with the state's SNAP State Agency. SNAP-Ed practitioners who report on SNAP-Ed services and results using NPEARS have thousands of hours of first-hand experience with its development and use. Published papers and formal comments on NPEARS are available on our website (<https://asnna.us.org>). Therefore, ASNNA brings a unique, expert perspective about revisions needed to the SNAP-Ed data system, listed as recommendations below.

It is important to consider two points: first, SNAP-Ed is the most comprehensive of any USDA nutrition education effort, and it has a very large, far-reaching footprint. SNAP-Ed is intended as a service program that responds flexibly to in-state and community conditions as well as national priorities, and it can be delivered by any qualified entity – universities, non-profits, state agencies and tribal bodies. These characteristics make design of an efficient e-reporting system difficult, and there are no prototypes available to serve as models. The 2018 Farm Bill required that USDA describe how state SNAP agencies shall use e-reporting, so USDA developed NPEARS to replace the long-standing Education and Administrative Reporting System (EARS). ASNNA immediately recommended that NPEARS use the 51 outcome topics cited in the *SNAP-Ed Evaluation Framework (2017)*, but only 7 of the 51 indicators were chosen as priorities for aggregation, while many administrative and research details were included instead. Little field testing occurred. Among the



innovative features of NPEARS was the effort to track system changes in thousands of service sites and also to link state plans with annual outcomes from year to year. NPEARS launched with states' FY 2023 annual reports, so there is now about two years of experience.

Second, Congress unexpectedly eliminated future funding for the SNAP-Ed program in July 2025, principally because, in spite of long-standing, extensive federal reporting, there are no federal reports about its effectiveness. Based in part on a 2019 GAO report that had cited issues with program evaluation, coordination, and data in USDA nutrition education programs, House Agriculture Committee statements charged in 2025 that the program was 'ineffective and duplicative'. While federal funds could be restored, at this writing SNAP-Ed is winding down and will end no later than September 2026 when all two-year funds expire. In some states, staff were terminated and programs closed in FY 2025. In FY 2026 only programs with carry-forward funding are operating. As these funds run out during FY 2026, states will close operations, complete the required NPEARS final report, and end all federally-funded SNAP-Ed services.

**The ASNNA comments below address both the four OMB questions and Congressional concerns. They are written in the understanding that the present NPEARS system will be retained through FY 2026 as SNAP-Ed sunsets and that, if SNAP-Ed is reinstated, a revision process for NPEARS report forms (FNS-925A and FNS-925B) would incorporate user experience as provided in this and prior NPEARS comment periods.**

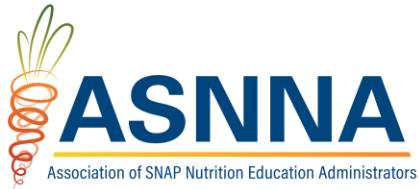
Based on input from NPEARS users, ASNNA compiled feedback on the existing system. Suggestions for revision and improvement follow below:

- Any key pieces of data need to be recorded in standardized fields. Based on Congressional concerns, this should include information about program effectiveness, impact, and outcomes, as well as coordination with other USDA programs to maximize impact and avoid unintentional duplication. SNAP-Ed implementing agencies have uploaded data in NPEARS to report administrative, process, and outcome information. It is not known if the Nutrition and Education Branch (NEB) which oversees NPEARS has aggregated information from standardized fields for monitoring and reporting on program results, or if it compiled other data about outcomes, impacts and coordination that were provided as attachments.

- A reporting system should facilitate IAs telling the full story of their programming. It should link individual, organizational, community, regional and statewide interventions over time, including annual reports to state plans from year to year, with options to select what changes carry over and which do not. Any new system needs to allow for the comparison of targets set in the state plan with results reported at year's end so the continuity between years is not lost as it is in the present system.
- A major shortcoming in the NPEARS systems has been tracking policy, systems and environmental (PSE) changes at the site level only. The updated State Plan and Report System (SPARS) should be able to compile PSE activities that serve entire communities or regions within a state or territory, not just those based on a single site.
- SPARS should have a larger emphasis on partnerships and coalitions, as SNAP-Ed often serves as a backbone organization in communities that links services together and amplifies the impact of other programs. To support this, a reporting system should be set up to allow IAs to report on the full breadth of partnerships. At present, those that conduct PSE activities and coalitions that include fewer than 5 sectors are not reported, and the work is lost. The current definition of coalitions as including representation from 5 sectors or more is arbitrary and therefore has prevented an accurate depiction of SNAP-Ed's coalition-based work from being reported.
- The SPARS system needs to expand opportunities to report on progress toward positive behavioral outcomes. In NPEARS, SNAP-Ed IAs report against behavioral benchmarks, which are set at a level that most people, regardless of SNAP or SNAP-Ed participation status, do not achieve. For example, NPEARS asks IAs to report on how many participants meet the guideline of consuming one or fewer sugar-sweetened beverages per day before and after participating in SNAP-Ed. Any decreases in sugar-sweetened beverage consumption that does not get to the ideal benchmark (e.g. decreasing from 4 sugar-sweetened beverages consumed per day to 2) cannot be recorded in the system, despite a strong potential for health impacts of that behavior change. ASNNA has serious concerns about how this prevents SNAP-Ed from reporting its true impact on individuals and families. As an alternative, using EFNEP reporting strategies (i.e. reporting on the percentage of participants who improved behavioral outcomes), would be a simple starting point

for an aggregable data point that can be included in the SPARS system, and it would harmonize with another federal program.

- SPARS should allow for consistent reporting for all 51 of the SNAP-Ed Evaluation Framework indicators, not only the 7 that USDA designated as ‘priority’. Based on its needs assessment and state plan, states collect information on any of the other 43 *Framework* indicators but don’t have a consistent way to report nationwide. Collaboration with ASNNA and other power users would enable USDA to identify better ways to capture outcomes through e-reporting.
- SPARS should incorporate qualitative data collection into the system, lifting up mixed methods evaluations to showcase behavioral outcomes along with qualitative data that highlights relationship building, community trust, and sustainability that undergirds SNAP-Ed’s success.
- SPARS needs to provide space to highlight the planning phase of PSE work, which involves forming relationships, solidifying partnerships, and building community trust. This groundwork leads to deeper community buy-in for PSE activities and improves sustainability, even though direct services to participants cannot be counted during planning stages.
- The system should add opportunities to report on IA or statewide work cohesively and holistically, not just by project. Often, work across different projects is complementary and should be considered together, and a reporting system should be flexible enough to demonstrate where linkages exist.
- SPARS needs to incorporate opportunities to report on project sustainability, including long-term and institutionalized changes where SNAP-Ed implemented a change and it is now being maintained independently by a partner as a result of SNAP-Ed work. The goal of SNAP-Ed programming should not be to support projects indefinitely, but rather to build community capacity and know-how to continue to make changes without help. Currently, there is nowhere to report that in the system.
- SPARS should allow users to report on and track changes in annual state plans and plan amendments from year to year, and improve filters, sorting, and flexibility to edit data such that data entry and analysis is quick and less labor-intensive.
- The system should allow users to pull, clean and analyze data directly in both pdf and spreadsheet formats, thereby improving data cleaning, analysis, and sharing capacity at the state and federal levels. PEARS (a private system upon which



NPEARS was based and that some states still use) automatically compiles data into user-friendly dashboards. Including the capability within the SPARS system for dashboards, maps, and other analyses that are needed for program management and that can be used to compile state-specific reports is essential.

ASNNA would also like to warn NEB regarding data integrity, retention, and access if there is any transition from NPEARS to SPARS, especially as SNAP-Ed capacity wanes during the nationwide sunset in FY 2026 or if SNAP-Ed is reauthorized. Concerns include:

- Undue burden to learn a new system for one reporting year. SNAP-Ed sunsets in FY2026. In addition to letting go of staff, informing partners that key services cannot continue, and wrapping up any direct education, PSE and social marketing programming, the limited number of remaining staff cannot be expected to learn a new reporting system.
- Switching to a new system has implications for data continuity, including aggregating data over time to show outcomes. This loss would be especially detrimental for congressional and stakeholder reports.
- Canopy, the PEARS and NPEARS contractor, offered highly competent and responsive technical support to NPEARS users. ASNNA would like to see the same level of support from the new reporting system, especially as most staff have less than one year to wrap up 30 years of work. Additionally, ASNNA shared a significant volume of technical suggestions in February 2025 with NEB that would greatly improve user experience. Those suggestions are listed with other supplemental materials at the end of these comments and should be incorporated in any new system.

Finally, while ASNNA supports the concept of e-reporting, our experience is that unless states and USDA work together, e-systems have not worked. Since at least 2010, states submitted comprehensive reports through EARS, but no public reports were ever produced. At the same time, states conducted evaluations that resulted in over 800 reports in peer reviewed publications. The most recent USDA report on SNAP-Ed in 2018 summarized what state reports contained, but it had no outcome and impact information. NPEARS was supposed to address this issue. Despite two years of NPEARS data, however, national SNAP-Ed outcomes have not been reported to Congress or shared with states.



Although SNAP-Ed is sunsetting, outputs from SNAP-Ed electronic reporting are needed to report on outcomes and understand how e-reporting can be improved. ASNNA recommends that national SNAP-Ed data be compiled and the following outputs be produced:

- Dashboards: Partner with ASNNA and other stakeholder groups to share national outcomes in dashboards.
- Reports: Report on updated e-metrics for outcomes in the *SNAP-Ed Evaluation Framework*-(2017). Collaborate with ASNNA and other power users to identify which indicators need more context or updates, and where there is opportunity to add new indicators.
- Policy: Use national data to show that the program leads to meaningful positive changes in communities and share with policymakers.
- Capacity: If SNAP-Ed is reinstated or a similar program is funded in the future, fund dedicated personnel and/or contractors with skills in public health nutrition and e-reporting to work with grantees and USDA on developing, testing and rolling out a streamlined, practical SPARS.

In summary, ASNNA supports an electronic data collection system for SNAP-Ed and is excited about the possibilities for aggregated national data, and urges that there be no changes to a new system now that SNAP-Ed has lost funding, but rather that USDA work with ASNNA to analyze and report outcomes from the available NPEARS datasets and also prioritize the characteristics that would be needed to improve the utility, functionality, and outputs of any future e-system.

Thank you for your consideration.

Gina Crist, Senior Co-Chair

Cristina Konnecke, Junior Co-Chair

Nora Downs, N-PEARS Team Lead



Supplemental Information Available at <https://asnna.us.org>

- ***National PEARS (N-PEARS) Feedback and Recommendations*** (ASNNA, February 2025)
- **Thirty Years of SNAP-Ed: The Transition of the Nation’s Largest Nutrition Education Program into a Pillar of the Public Health Infrastructure. *J of Translational Behavioral Medicine*** (Journal of Nutrition Education and Behavior (JNEB), Aug. 2024)
- **Framework 2.0: ASNNA Conference Feedback Summary** (ASNNA, June 2024)
- **Guide to Coordination and Collaboration** (ASNNA, July 2023)
- **OMB Comments for N-PEARS** (ASNNA, April 2023)
- ***First Analysis of Nationwide Trends in the Use of the SNAP-Ed Evaluation Framework*** (JNEB, March 2023)
- **Federal Register Comments for N-PEARS** (ASNNA, Aug. 2022)
- **SNAP-Ed Evaluation Framework 2.0 Workshop: Keeping the Framework on the Leading Edge** (ASNNA, July 2022)
- ***The SNAP-Ed Evaluation Framework – Nationwide Uptake and Implications for Nutrition Education Practice, Policy, and Research*** (JNEB, Dec. 2021)
- ***Recommendations for Implementing the Nutrition Education and Obesity Prevention Grant Program (SNAP-ED) Provisions of the 2018 Farm Bill*** (ASNNA, Dec. 2020)
- ***The SNAP-Ed Evaluation Framework: demonstrating the impact of a national framework for obesity prevention in low-income populations*** (J Translational Behavioral Medicine, Oct. 2019)