

USDA – Food and Nutrition Service
OMB Number #0584-NEW
Education and Administrative Reporting System (EARS)
Supporting Statement

Introduction

The Food and Nutrition Service (FNS), U.S. Department of Agriculture (USDA) is requesting approval from the Office of Management and Budget (OMB) for the Education and Administrative Reporting System (EARS). EARS will provide uniform data and information on nutrition education activities funded by the Food Stamp Program (FSP). Data collected under this new system include demographic characteristics of participants receiving nutrition education benefits, topics covered by the educational intervention, education delivery sites, education strategies, and resource allocation. The data and information collected through EARS will inform management decisions, support policy initiatives, provide documentation for legislative, budget and other requests, and support planning within the agency. The information will provide an annual description of Food Stamp Nutrition Education (FSNE) administration and activities in each state. It will improve USDA's oversight capacity and inform FSNE policies and practices in the future.

A. Justification (*Questions and Responses*)

1. Explanation of Circumstances That Make the Collection of Data Necessary.
Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Background

The largest of the USDA nutrition assistance programs, the FSP provided monthly food benefits for over 26 million Americans in low-income households in fiscal year 2006, along with nutrition education designed to help food stamp participants and eligibles choose healthy foods and active lifestyles. Under current FSP regulations (7 CFR 272.2 (d)), state FSP agencies have the option to provide, as part of their administrative operations, nutrition education for persons who are eligible for the program. States must submit an annual nutrition education plan to FNS for approval; FNS then reimburses States for 50 percent of the allowable expenses for nutrition education. The goal of FSNE is to improve the likelihood that persons eligible for the FSP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current *Dietary Guidelines for Americans* and *MyPyramid*.

State FSP agencies contract with one or more "implementing agencies" that develop and deliver nutrition education services. The Cooperative Extension Service of State Land-Grant Universities is the predominant implementing agency but public health departments, university academic centers and other types of organizations also sponsor FSNE. Implementing agencies, in turn, usually deliver nutrition education to FSP participants and eligibles through local projects or subcontractors.

Need for Information

Because low-income Americans suffer disproportionately from the problems of poor diet, overweight, and obesity that all Americans face, considerable attention in recent years has focused on ways the FSP can promote healthy choices. FSNE represents an important tool for reaching this goal. Over the past fourteen years, the number of state FSP agencies that received approval for federal reimbursement of nutrition education activities increased from seven in FY 1992 to 52 State agencies in FY 2006. Federal funding approved for food stamp nutrition education has also grown from \$666,000 in FY 1992 to over \$248 million in FY 2006 (USDA/FNS, 2006). Currently, FNS has limited information regarding how many FSP participants and eligibles receive this nutrition education, where and how they receive it, and other basic features.

While States currently submit a final report on their FSNE activities each year, there is no standardized format required for the type and quantity of information provided in this report, or common definitions of data elements. Current FSNE guidance supplies an optional template for the final report, but most States submit these reports in narrative form and the definitions of some terms vary from state to state. Consequently, consolidation of reported information to gauge the scope and depth of FSNE across the nation is not possible.

EARS will allow for the collection of uniform data on program activities, making it possible to describe who is reached, what they are taught and how resources are used in FSNE. The EARS standardizes definitions and allows for the collection of uniform data on nutrition education activities funded by the FSP. A uniform reporting system will enable FNS to get a national picture of the reach and scope of FSNE and inform management decisions on ways to improve services.

Authority for Collection

Current FSP regulations (7 CFR 275.3 and 275.5) state that FNS has the authority to monitor project areas to determine that the FSP is operating in accordance with the Food Stamp Act, regulations, and FNS-approved State Plans of Operation.

2. How The Information Will Be Used, By Whom, And For What Purpose.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The EARS will provide FNS, state FSP agencies, implementing agencies, and other program stakeholders with much needed information on FSNE goals, objectives, target audiences, approaches, activities, settings and use of resources by state. Data will be submitted electronically by all state FSP agencies annually. State agencies need only report applicable information on items applicable to the educational services they provide. Financial data is the only required data. The data collection and analyses will provide FNS with the opportunity to monitor characteristics of the participants and nutrition education services being delivered and as well as use of resources.

The information to be collected is organized under four topics: *Direct Education, Social Marketing Initiatives, Indirect Education, and Summary of Expenditures.*

Direct Education is defined as interventions where a participant is actively engaged in the learning process (with an educator or interactive multimedia). The nature of these contacts allow educators to collect basic demographic information from FSNE participants. Items 1-6 on the form relate to Direct Education and should provide an unduplicated count of individuals reached and their demographic characteristics – at a minimum, the numbers of individuals, and their Food Stamp Program participation status, age, gender, and race/ethnicity.

Social Marketing is defined as a disciplined, consumer-focused, research-based process to plan, develop, implement and evaluate interventions, programs and multiple channels of communications designed to influence the voluntary behavior of a large number of people in the target audience (adapted from Alan Andreasen 1995 and Social Marketing Division of Society for Nutrition Education). Item number 7 on the form relates to Social Marketing and calls for descriptive data for each social marketing campaign, including the reach and related costs.

Indirect Education is the distribution of information and resources and includes any mass communications, public events and materials distribution that are not part of Direct Education or Social Marketing Campaigns. Information reported under Indirect Education is considered an estimated measurement for general distribution of education resources. EARS Item number 8 captures descriptive data on Indirect Education.

Summary of Expenditures captures information on expenditures by type of funding and by category of spending for FSNE. EARS Items 9-10 captures this information.

FNS will use the EARS reports to describe FSNE on a national level including demographic characteristics of participants, the primary focus of FSNE activities, the location of the activities, the educational methods used and the sources and expenditure of the resources used to conduct FSNE. EARS will allow FNS to aggregate data and information. This data will provide a regional and national picture of who we reach with descriptive demographic and program information that will over time yield trends. This data will also facilitate monitoring and allow FNS to provide technical assistance when needed. The information will inform management decisions, support policy initiatives, and provide documentation for legislative, budget and other requests. Data will be reported to FNS online only once per year and may be useful to educational institutions and others as well. The EARS form will be submitted along side the annual narrative report that allows cooperators to describe programming activity in greater detail than can be reported in the EARS form alone. The form is not intended to be used as an evaluation tool but rather to describe activities and develop trends regarding these services.

3. Use of Improved Information Technology to Reduce Burden.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

FNS is committed to complying with the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services. To this end, FNS plans to implement the system through a web-based format that will make reporting more efficient and accurate. The EARS form will be an electronic application that respondents complete and transmit online.

Every effort has been made to design an instrument that facilitates the uniform reporting of data and minimizes, to the extent possible, the time required for reporting. Features of the web-based form intended to reduce burden include skip pattern questions that only some respondents need answer; highlighted “key words” that respondents can click on to see standard definitions; and “drop down” responses with coded responses from which to select responses. The web-based format will be designed and tested during FY 2007 with plans for the first official data collection at the end of FY 2008. States will have 24 months in which to fully comply with the new reporting requirement.

4. Efforts to Identify and Avoid Duplication.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Every effort has been made to avoid duplication of data collection efforts. These efforts included a review of current reports submitted to FNS, data collected by the Cooperative Extension Service, state organizations and studies.

Before initiating this effort, FNS reviewed State plans and annual reports to ascertain what data were available. We found that while many States submit an annual FSNE narrative report containing some demographic information and a summary of progress in implementing prior year’s plans, there is wide variation in the definitions used and type of information provided. As a result, it was not feasible to consolidate information to describe the magnitude and reach of education efforts on a regional and national level.

The FSP currently collects information on the characteristics of recipients and households including their racial/ethnic composition; however, this data does not identify persons that receive nutrition education. Therefore, this information cannot be used to describe characteristics of person’s receiving nutrition education. In addition, FSNE reaches other segments of the low-income population that are not participating in the FSP.

The Cooperative State Research, Education and Extension Service (CREES) currently collect information for their Expanded Food and Nutrition Program (EFNEP) using their Evaluation/Reporting system (ERS). This system provides diagnostic assessment of participants needs, and exports summary data for State and national assessments of the program’s impact. The EARS form collects only descriptive information on nutrition education activities funded by the FSP and not evaluation or outcome data on the program or its participants. Once implemented, EARS will be the only federally funded information collection that attempts to collect descriptive data on nutrition education activities of state FSP agencies and the resources used in providing the services.

5. Efforts to Minimize Burden on Small Businesses or Other Entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

No small business or other small entities will be involved in the data collection effort for EARS.

6. Consequences of Less Frequent Data Collection.

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

EARS is designed as an annual State agency data collection instrument. The information is necessary to allow FNS and State agencies to conduct their stewardship role including the identification of gaps in education services and consistency with FSNE guidelines so that FNS can provide guidance, training and technical assistance. The report will also allow FNS, State agencies and others to describe and address questions about nutrition activities funded by the FSP.

Without this data, FNS would not be able to respond timely and effectively to legislative and budget information requests or monitor trends in program activities. Given that the size of the Federal share of FSNE has grown rapidly to \$248 M in 2006, it would be highly desirable for FNS to have access to basic descriptive information about who is served, what and where they are taught and how the resources are spent. Access to this information will aid in measuring the agency's efforts in pursuing meeting Objective 5.2 in the USDA Strategic Plan, "Promote Healthier Eating Habits and Lifestyles," which represents FNS' efforts to promote healthier eating habits and lifestyles among all Americans, including those served by the Food Stamp Program.

7. Special circumstances requiring data collection inconsistent with CFR 1320.5(d)(2). Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority**

- established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

 - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances requiring the collection of information in a manner inconsistent with the following components of Section 1320.5(d)(2) of the Code of Federal Regulations:

- No respondent will be required to report information to the agency more often than quarterly;
- No respondent will be required to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- No study respondent will be required to submit more than an original and two copies of any document;
- No respondent will be required to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- This collection of information is not for a statistical survey and will not be generalized to the universe;
- The collection of information does not require the use of data classification that has not been reviewed and approved by OMB;
- No collection of information associated with EARS will include a pledge of confidentiality; and
- No collection of information associated with EARS will require respondents to submit proprietary, trade secret, or other confidential information.

8. Federal Register Comments and Efforts to Consult with Persons Outside the Agency. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

The Food and Nutrition Service (FNS) used a collaborative approach in developing the reporting system by forming a work group of diverse experts. The EARS work group consisted of stakeholders who brought a wide range of skills and expertise relevant to this task, including representatives from the State FSP, implementing agencies, federal government and academia.

The developmental process allowed many opportunities for input from all stakeholders. One of the charges to the workgroup was to continually communicate with colleagues and keep them informed of the group's progress. Both informal and formal opportunities for comments were incorporated at several points in the developmental process. The timeline for developing and testing the EARS was approximately 30 months.

The development of the EARS began with a review of the 2002 Annual Reports to identify if common data were collected and if so what. Then, once the workgroup formed, the process included three distinct phases.

Phase One

The first phase included identifying data elements and drafting the data collection form through a facilitated work group process. In March 2004, the work group informally pre-tested data elements with volunteers to determine whether the questions and instructions were clear and whether states captured the data elements in their program reporting systems. The five volunteers included FSNE coordinators in Arizona, Colorado, Georgia, Montana, and Pennsylvania.

Phase Two

In preparation for the formal pilot testing, the work group provided review and suggestions on the pilot testing process and materials. The pilot test was conducted from September 2004 – January 2005 in six states including California, Kansas, Illinois, New Mexico, New York, and West Virginia. It was comprised of four stages:

- 1) Information gathering and consultation
- 2) Data collection using the draft EARS form
- 3) Follow-up surveys
- 4) Exit consultations

Phase Three

By September 2005, the work group produced a new draft of the EARS form for broader review by stakeholders based on the results of the Pilot Test. The form was posted on the FSNE website for comments. In addition, follow-up visits were conducted with the six states who participated in the formal pilot testing to get their feedback on the modifications made to the form.

Throughout the three phases, the work group met regularly to refine and revise the data elements and the data form based on the results of testing and feedback from state and local FSNE programs. In addition, presentations on the development of EARS were given at the 2005 National Nutrition Education Conference and the 2005 Annual Society for Nutrition Education Conference. The draft form has also been available for review and comments by FSNE stakeholders on the Food Stamp Nutrition Connection website since October 2005 and periodic updates on the creation of the form and the pilot testing were published in the Nutrition Update Newsletter.

The Public Notice was published on July 13, 2006, at 71 FR 39656. Public comments received and agency responses are summarized below.

Summary and Responses to EARS Public Comments

Commenter	WA DOH
Comment	Response
It's challenging to ID FSP participants among FSNE participants without embarrassing them	FNS has determined that there are ways to collect this information that would not embarrass the participant. For example, some States ask for FSP status on an enrollment form for the education session, others obtain it during individual interviews, and some use feedback forms.
Inconsistency with 2007 guidance: why does EARS require states to separate FSP participants from non-participants? What about FSP eligibles?	The EARS form captures data on "Food Stamp Program Recipient" and "Other Participant." FSP eligibles are captured in the "other" category. FNS believes it is important to track the proportion of FSP recipients as well as eligibles participating in FSNE.
Feasibility of collecting unduplicated counts given (a) some individuals may be enrolled in several different programs where they receive FSNE services or they may take more than one class per year and (b) identifiable data is kept separate from data collection forms to ensure confidentiality of responses	FNS has identified States that currently are collecting unduplicated counts. Unduplicated counts are only required for direct education activities which lend themselves to the collection of the data that is requested; i.e., demographic data and unduplicated counts. FNS recognizes that some States will need to make adjustments in their current data collection processes and will provide technical assistance training and on-line resources to support these efforts.
What is the value of collecting gender?	As with other demographic variables, this information provides a description of who is being reached by FSNE services. In addition, FSNE Guiding Principles state that FNS encourages targeting first women, then children in households participating in the FSP. The gender information collected on the EARS form will reflect the extent the States and implementing partners are following this guidance.
It will be challenging to collect information by race and ethnicity; doing so will effect evaluation/reporting by FSNE participants.	FNS has identified SAs that are currently collecting this data in a sensitive manner and will share these methods with other States during training. Note that the collection of this data does not need to be linked to evaluation or reporting. For example, it can be done as part of a "get to know you" form or enrollment form for the class and should not impact participation.
Collecting race/ethnic data will require at least two additional questions be asked when time and space are already at a premium for evaluation and reporting.	Demographic information need only be collected for participants of direct education. If the educational situation is not conducive to collecting it, the session may be counted as indirect education. This is a one-time data collection that should not have a negative effect on evaluation or other reporting.
Generally collect race/ethnic information by observation for younger age groups so	Although it is preferable to collect self-declared racial/ethnic data, FNS understands the difficulty in collecting this from children. Since most kids are reached in school settings, educators may use school-wide and/or

asking for detailed counts may not be feasible.	classroom data to determine race/ethnicity composition of kids. FNS will provide examples of acceptable methods in the training session and materials.
Some electronic systems do not support the racial/ethnic categories requested.	The EARS form uses the revised OMB <i>Standards for the Classification of Race and Ethnic Data</i> published by in the Federal Register on October 30, 1997 and adopted by FNS on May 18, 2006. States need to make these changes, regardless of EARS. FNS realizes this is a change from prior reporting categories and has allowed for a two year implementation window for EARS.
Seems like a lot of data manipulation will be required by local agencies to roll up racial and ethnic data into required EARS reporting format.	Racial/ethnic categories have been redefined throughout the FSP as a result of the adoption of OMB's 1997 rule. FNS believes that once the newly established racial/ethnic data are standardized in the program, little manipulation will be needed to aggregate the data.
Racial/Ethnic questions could be considered intrusive and affect participation in evaluation/reporting by FSNE participants.	Racial/ethnic data is routinely obtained in all FNS Programs. This information can be collected in a sensitive manner. FSP currently collects this data and so do some FSNE implementing agencies. It does not have to be done at the same time as any evaluation/reporting by the recipient. For example, it can be done as part of a "get to know you" form or enrollment form for the class.
Why is the number of Hispanics or Latinos broken out and crossed referenced to other races? Is this a standard way of reporting?	Yes, this is the standard defined by OMB in 1997 and adopted by FNS in 2006.
May want to add a "no response/refusal" box to track how well race/ethnic data is being collected.	The workgroup considered this suggestion but felt that because of the nature of direct education, this data should be able to be collected. If this data can not be collected for a particular event, the educational event can be reported under indirect education.
In question 4, are you looking for "setting" or "type of participant" reached?	Question 4 is looking for the location where education is occurring. The examples were included to assist in the decision making process for the rare occasions where a site could be included in more than one location. The instructions state that in these cases, the location that best reflects the nature of the service delivery or group served could be selected.
Need to provide more examples and clarification on where to report Boys and Girls Clubs, special after school programs and clubs.	FNS intends to provide instructions on where to report these during EARS training, in online training and materials that will be updated periodically.
Unclear where to report kiosks/computers for question 4.	Under the special note, the instructions indicate that the locations where the kiosks/computers are available should be reported. For example, if they are located in WIC clinics, report these sites in the "WIC Program" category.
For question 6, is the intention to find the primary content of	The intention is to collect information on the primary content of direct education. Examples will be provided during the EARS training and

direct education or the range of topics covered? More clarification needed on how to respond.	included in on-line training materials as well.
Section 7 seems very sophisticated and beyond the level that could be expected from local agencies/contractors although the templates seem well done.	The EARS form is intended to be used by State FSP agencies not the local level programs. Social Marketing programs typically are implemented by State agencies or FSNE implementing partners and not directly by local level programs.
What is the difference between the indirect education and social marketing questions on numbers reached by communication or events?	The difference is in how the communication/event was planned and executed. If it is part of a social marketing campaign, it should be reported under the social marketing section. If it not, then it is considered indirect education and should be reported in 8b.
It would be helpful to have examples or guidance on standard data collection tools that may be used by local programs to gather this data.	It is FNS's intention to provide examples as part of the EARS training and on-line resources.
Concerned that local programs will have a hard time collecting FSP participation data given their lack of training and burden of other program duties. Are there suggestions on how to train contractors to collect this data?	FNS will conduct training before the beginning of the implementation period. The training will involve States sharing sessions to transfer effective methods used by implementing agencies that already collect many of the elements contained on the EARS form or that have already conducted trainings with their contractors. Information from these trainings, as well as the materials, will be shared via the FSNE website.
Should pilot test EARS form.	The EARS form was pilot tested in six states from September 2004-January 2005.
Need to convey to users how information will be used and what benefit it will have to state and local FSNE programs. Answer "What's in it for me?" question.	The information collected can be used to describe FSNE activities including whom we reach, key topic areas that are taught, how resources are used, tracking trends in participation, etc. State and local FSNE programs and implementing agencies will be able to use this information to identify un-met need, share information with key partners, describe the population they serve, and track progress in meeting their goals. The information may also be useful for justifying State and local funding requests and to provide trends data.
Is there an expectation that programs cannot do direct education unless they meet the definition stated on page one of the form?	In order for an education event to be considered direct, it must meet the definition stated on the EARS form. In person activities that do not meet this definition may be reported as indirect contacts. An example is a health fair or community event where it is not feasible to collect demographic data and/or unduplicate counts.
It is more helpful to place instructions before tables or	States that participated in the Pilot suggested that the instructions follow the tables. Therefore, we placed the instructions after each question

on a separate sheet.	(table).
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Commenter	AZ Dept of Economic Security
Comment	Response
Costly and administratively burdensome data systems for tracking FSNE client demographics are not required.	Many States are already tracking FSNE clients because they find it valuable to understand who they are reaching and to ascertain if FSNE makes a difference. This information is also important for program planning. To plan and implement effective nutrition education it is important to understand the target audience. For this reason some States are already collecting this information. Based on information obtained from these SAs, it does not appear that the collection of this data is costly or administratively burdensome.
Participation in FSNE should not require the provision of data that duplicates the FSP application process.	It is important to understand who is receiving FSNE services. FSNE participants include FSP recipients as well as persons who are potentially eligible for the program. Therefore, data from the FSP application process alone cannot be used for FSNE participation.
Community based FSNE activities should not require the collection of FSP status, for confidentiality reasons.	FNS believes that gathering demographic information for program participation can be done in a sensitive manner. Community based activities can be reported under the indirect category if they do not meet the definition of direct education (see 8b).
Unduplicated counts of participants will be costly for FSNE implementing agencies reaching large numbers of participants in a wide variety of community settings.	Unduplicated counts are only required for direct education. Community activities that do not meet the definition may be reported as indirect.
Complex data systems (like those for the FSP and WIC) will be required to track unduplicated counts and participant demographics.	Interviews with a sample of States that are now collecting this data do not indicate that complex data systems are needed to collect unduplicated counts and demographics of persons receiving direct education in FSNE.
Appropriate methods for collecting demographic data need to be identified so there is consistency between states.	Guidance will be given during the training. Examples from States that are now collecting this data will be shared and posted on the FSNE website too.
Demographic reporting should be consistent with how data is gathered and reported for other systems (FSP, WIC, census, vital Records etc).	The demographic reporting on the EARS form is consistent with FSP and WIC.
Better integration of FSNE into FSP data collection may allow for data without duplication of systems and	FNS encourages implementing agencies to work with the State Food Stamp Office to explore opportunities for establishing integrated approaches for this data collection.

costs.	
Appropriate documentation and QA for targeting of locations for FSNE activities may be more effective than extensive data systems to track individual participants.	FNS agrees it is important to target locations where it is likely to encounter persons eligible for FSNE. To that end, the 2007 FSNE Guidance contains proxy sites for FSNE services delivery. However, tracking participants in nutrition education is a basic and critical function, to measure the number of people reached.
Investing in behavior change evaluations may be of greater value than establishing a costly data system to track demographics of FSNE participants.	It is important to invest in processes to assist us in describing FSNE at the local, State, and national levels. The information collected through EARS will support each level to carry out their stewardship roles more effectively by informing program providers and policy makers about the focus of FSNE, who is served, and how resources are used. FNS is also investing in evaluation through guidance and resources to aid States in planning and conducting evaluations.

Commenter	Chicago Partnership for Health Promotion (on behalf of the University of Illinois)
Comment	Response
Unduplicated counts by age and ethnicity requires an enrollment form. This is unrealistic due to limited time, staff allocation, and participant willingness to share this information.	Many States that are now collecting unduplicated counts use an enrollment process. Most of these States have collected this data since the inception of these programs because they find this data is valuable. FNS does not believe establishing such a system needs to be costly or administratively burdensome, and will share techniques to facilitate replications in SAs that do not have a process in place.
Unduplicated counts will not be accurate and result in gross estimation.	FNS understands there will be some “noise” in the count as it would be unreasonable to make the count perfectly unduplicated. Through training and technical assistance, the amount of noise will diminish and provide useful trend data over time.
How do you incorporate wavered counts into the count?	Recipients of direct education in waived sites must be treated the same as those at other sites. Basic information should be collected from the participants and tabulated the same way.
Many FSNE participants fit none of the listed multiple race categories. The majority will be listed in line 10 A and B.	If Line 10, A and B are the categories that best fit the recipients, then this is where the data should be reported.
Please include “food safety” or “safe food handling” in the list of topics.	FNS does not believe these topics should be the focus of FSNE nutrition education sessions. Rather, they should be incorporated as part of the content under other topics.
Consider revising Item 6 so respondents can indicate the percentage of program covered by each topic instead	The EARS workgroup revised this question to allow respondents to indicate their primary topics instead of reporting on every topic or using percentages. The original question had asked for reporting based on percentages but the pilot revealed problems in both interpreting this

of picking 4 topics only.	question and aggregating the results.

Commenter	County of San Bernardino, DOH
Comment	Response
Information tracks numbers reached but does not track impact or exposure	The EARS form collects descriptive data on FSNE activities. FNS encourages States to submit narrative reports on their FSNE activities highlighting successful program outcomes and impacts.
Much of FSNE is done in context that does not allow for the collection of information on participants.	FNS recognizes that FSNE cooperators use different methods of education and that not all types are conducive to collecting participant information. Basic demographic information of participants is only required if the session is to be counted under direct education.
Will require hours to complete the forms at local level.	The form will be completed at the State Agency level.

Commenter	Contra Costa Health Services
Comment	Response
It is time consuming and invasive to ask participants to identify themselves by ethnic group/race. The population served will reflect the qualifying community (census tract or school with 50% or more free or reduced price meals).	FNS does not believe it is time consuming to identify race/ethnic status of recipients of direct education. FNS agrees it is important to target locations where it is likely to encounter persons eligible for FSNE but believes it is also critical to collect information on recipients of at least some FSNE services (direct education). EARS provides several options for reporting community based FSNE activities. The type of data reported is based on the educational approaches used. Unduplicated counts are only required for direct education. The EARS forms provide guidance for capturing unduplicated counts in schools.

Commenter	California Association of Nutrition and Activity Programs (CAN Act)
Comment	Response
The data collected will not provide information on behavior change (outcome).	EARS is an Education and Administrative Reporting System that collects descriptive data on FSNE activities. States can still submit narrative reports on their FSNE activities highlighting successful program outcomes.
The social marketing section seems inadequate to capture the depth and extent of the work carried out by the group's members.	States can submit narrative reports on their FSNE activities highlighting the depth and extent of their work and to share outcome and impact information.
This additional set of data to	FNS recognizes that States that are not currently collecting will need to

collect is unreasonable and will add to the administrative burden of staff.	make adjustments; however, this data is important and some States are already collecting this information.
Local programs believe participant data (ethnicity, age, and program status) will be considered intrusive by participants.	While we understand this view, the FSP routinely collects this information. FSNE implementing agencies in some locations do so as well without stigmatizing or embarrassing the participant. For example, they can be asked to indicate their FSP status on an enrollment form for the education session.
The form doesn't collect information on "eligibles", just FSP recipients and "others".	The form has the following categories "Food Stamp Program Recipient" and "Other Participant." FSP eligibles should be reported in the "Other Participant" category.
FSNE is conducted in settings that are not conducive to collecting information (festivals, farmers' markets, supermarkets).	Not all settings need be reported under the direct education section of the form. Demographic information need only be reported for situations that meet the definition of direct education provided on the form. Education conducted in settings that are not conducive to collection of this data may be reported as indirect.
Services are already provided in census tracts. Collecting further detail would increase administrative burden.	FNS agrees it is important to target locations where it is likely to encounter persons eligible for FSNE but believes it is also critical to collect information on recipients of FSNE services.
An evaluations system should be designed, not a system that takes staff time away from program delivery.	EARS will provide valuable information to allow both FNS and SAs to carry out their stewardship functions. FNS has provided and will continue to provide guidance on evaluation.

Commenter	Alameda County Public Health Dept.
Comment	Response
It will be difficult to collect demographic information, especially on school children.	FNS agrees that different methods of collecting this information on school children may be needed. The instructions for item 1 provide an example of how to tabulate and report FSP status of children. School based racial/ethnic data can likewise be used if classroom data is not available. Gender can be identified visually.
Data collection and tracking will be time consuming.	FNS realizes this is a change from current data collection for some States but expects that after the two year implementation window, the data collection and reporting will be more efficient and accurate.
All services are provided in census tracts or in schools with high percentages of free and reduced lunch. Collecting and compiling further information will be administratively burdensome.	FNS agrees it is important to target locations where it is likely to encounter persons eligible. However, it is also critical to collect information on recipients of direct education. Examples of how to use free lunch participation data to compute a response to item 1 are provided.
Concerned about the lack of focus on behavior change	The EARS form collects descriptive data on FSNE activities primarily to aid in the stewardship role and inform policy decisions. States are

(outcome).	encouraged to submit narrative reports on their FSNE activities, highlighting successful program outcomes and impacts.
USDA should work with FSNE programs to develop and evaluation system that will provide measures to enhance program services, not a system that draws staff time away for data collection and compilation.	FNS is working to strengthen evaluation and enhance program services. EARS data can be used to identify gaps in services, trends in levels of FSP participants and eligible populations served, what the primary topics addressed are, methods used ,and locations where services are delivered, etc. In addition, to promote impact evaluations FNS has provided guidance, financial support for joint work with other USDA agencies, and technical assistance.

Commenter	Michigan State University Extension
Comment	Response
Collecting demographic information from participants creates concerns about confidentiality and public embarrassment.	FNS has found that some States are currently collecting this information without compromising confidentiality. The approaches used by those States will be shared during trainings.
It will be difficult to provide unduplicated counts without access to State FSP information.	Since FSNE services are provided to FSP participants as well as those who might be eligible, having access to State FSP information will not provide all the information needed for the form. Information will still need to be collected from recipients of direct education.
The burden is based on the assumption that IAs have access to the FSP applications.	The burden calculated is based on the experience of six states in the pilot test of the form.
Key step to successful implementation is to allow IAs access to FSP data.	FNS encourages implementing agencies to work in partnership with states and local Food Stamp Offices to identify appropriate ways to share information and coordinate efforts to reach FSP and other eligible recipients.
Recommend a wording change to allow time needed to prepare lessons, arrange materials etc. are considered ‘Program Delivery’ costs under item 10.	Costs associated with these activities can be counted under “Program Delivery”. This can be clarified during EARS training and in training resources that will be available on line.
Link should be made between IA and FSP State Agency database to overcome confidentiality issues.	FNS encourages IAs and State FSPs to work together to address our concerns about confidentiality. FNS will share practices used by other States during trainings and TA visits.

Commenter	Ukiah Unified School District
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Comment	Response
Form is additional administrative burden that will take time away from education activities.	FNS realizes that implementing the new form will be more difficult for agencies that are not currently collecting the data. Consequently, FNS has allowed a two-year implementation period. FNS believes collecting the information contained in EARS is important to understanding FSNE activities, for informing policy decision, as well as tracking trends in who is served, etc.
Much of FSNE is done in a context that does not allow for the collection of demographic information.	FNS recognizes that to be effective, nutrition education needs to use multiple approaches and delivery channels that allow for multi exposures to behavioral focus messages. The EARS form has taken this and other factors into consideration by allowing several options for reporting activities. If the context or method of delivery of the education content prevents the collection of demographic information, the education session may be counted under indirect or social marketing, as applicable.
Urge USDA to develop a system that provides feedback and measures impact of FSNE programs rather than a system that will generate little meaningful information.	The EARS form will provide useful information that can be used at the State, local and National levels to inform management decisions, describe services including who we reach, what we teach, methods and channels used, key content communicated and how resources are used. This information can be used to justify budget requests, identify unmet need for services, and identify areas where new policies are needed, etc.

Commenter	CA Dept of Health Services
Comment	Response
Staff time and effort will be diverted from education and program delivery to administrative tasks like collecting data.	FNS realizes that implementing the new form will be more difficult for some than others and has allowed a two-year implementation period. States that are now collecting the information contained in EARS report that the time spent is necessary and justifiable given the utility of the data.
Demographic information contained on EARS will not inform if there has been behavior change.	The EARS form collects descriptive data on FSNE activities. States can still submit narrative reports on their FSNE activities highlighting successful program outcomes.
Work already in areas designated by census tracts and these sites are not conducive to collecting demographic information. It will be impossible to report unduplicated counts of these participants.	Not all educational activities need be reported as unduplicated. If the education does not meet the definition of direct education on the EARS form and is not conducive to collecting demographic information, the session should be counted under indirect education or social marketing.
Gathering the demographic data may be	Some states are now collecting this information in ways that do not stigmatize or embarrass the participant. For example, they asked for FSP status on an

seen as stigmatizing or breaching confidentiality.	enrollment or feedback form for the education session.
Collecting this data for all classes, in all agencies over a 12 month period is not practical.	Not all educational activities need be classified as direct education. If the educational session does not meet the definition of direct education on the form and is not conducive to collecting demographic information, the session should be counted under indirect education or social marketing.
Simplified measures (public statements, class sign in sheets, raising hands) are not appropriate for collecting FSP status.	FNS agrees. FSP status can, however, be collected in a sensitive manner. Methods used by States that are now collecting this data will be shared during training and posted on the FSNE web-sites so that they may be replicated and/or modified for use in other areas.
The social marketing section of the form does not capture the depth and extent of the work carried out in CA.	States may submit more detailed narrative reports on their FSNE activities highlighting the depth and extent of their work. EARS was not designed to capture everything States are doing.
EARS does not contribute to improve or measure improvement in diet or physical activity levels.	The EARS form collects descriptive data on FSNE activities. States can still submit narrative reports on their FSNE activities highlighting successful program outcomes. EARS will provide information that can help to inform policy and management decisions that aim to improve FSNE.
EARS does not appear to answer questions about coordination, results and activities – as posed in reports from congress, the government Accountability Office and the Office of Management and Budget	EARS was not created to answer questions about coordination and program outcomes. It will however provide much needed descriptive information on nutrition education activities funded by the FSP.
Would like to see a set of “dummy” tables that clearly illustrates the format in which USDA plans to display the collected data and explains how each element will be used for future policy, planning and decision-making purposes or respond to issues raised in government evaluation reports.	FNS anticipates that EARS will provide a rich source of data for use by Federal and State Agencies, researchers as well as academic institutions. FNS plans to prepare standard tabulations and charts that display trends and characteristics based on the data collected. State-level tabulations will be available for States to share with others in their States. Regional and national tabulations will also be generated and shared.
The estimated burden is grossly underestimated.	This is a new collection and the burden hours have been estimated based on the Pilot Test of the form. The form will need to be reauthorized every three years. Therefore, in three years a new estimate will be calculated based on more current implementation data.

Resources will be diverted to administration and less to program delivery without adding anything to program effectiveness.	FNS realizes that implementing the new form will be more difficult for some than others and has allowed a two-year implementation period. Cost associated with implementing the form and collecting the data are allowable costs and, as with other costs in FSNE, FNS reimburses 50% of allowable costs associated with FSNE. For the 5 year period, this amounts to about \$23,000 per State Agency annually. The value of collecting unduplicated counts which will assist FNS and States in planning, assessing and managing FSNE outweighs this cost.
The form will be challenging to complete and will cause increased workload at the IA level due to time spent responding to questions.	FNS realizes that implementing the new form will be more difficult for some than others and has allowed a two-year implementation period. Once implementation is complete, it is expected that the data collection will be more efficient.
In addition to staff time to collect the information, there will be startup costs for developing an online database to collect the information. Estimated costs of \$40,000 - \$60,000	FNS recognizes there will be start-up costs associated with implementation of the form. The response to question 13 of the Supporting Statement details USDA's estimation of these costs. Once again however, these costs will be shared because, as with other costs in FSNE, FNS reimburses 50% of allowable costs associated with FSNE.
Many contractors conduct both direct education and social marketing and so there may be duplication of numbers reported in these sections.	FNS requests only unduplicated counts for direct education. We acknowledge that when other methods are also used, additional contacts will be received by persons receiving direct education. These contacts help to reinforce the direct education, extend learning, and support behavior changes.
FSP participation with social marketing would have to be estimated based on secondary data.	As the instructions for the social marketing section explain, numbers reported are not an actual count of individuals but rather an estimated or expected number of impressions or contacts from marketing data or the campaign plan.
Indirect education section does not allow for reporting of education to intermediaries.	The EARS report seeks information about FSNE services to FSP participants and eligibles.
Race/ethnic question is difficult to complete because Hispanic/Latino is usually considered a race and the form does not have an "other" or "decline to state" response.	As the new terminology becomes more common, this problem will be minimized. The EARS form uses the revised OMB <i>Standards for the Classification of Race and Ethnic Data</i> published by in the Federal Register on October 30, 1997 and adopted by FNS on May 18, 2006. Because of the nature of direct education, this information should be able to be collected.
The race/ethnic categories differ from what is currently being collected	The EARS form uses the revised OMB <i>Standards for the Classification of Race and Ethnic Data</i> published by in the Federal Register on October 30, 1997 and adopted by FNS on May 18, 2006

in CA schools, WIC sites and Head Start.	
For items 6 and 7, respondents should be able to check off coded responses rather than have to look them up.	EARS will be completed online by the State FS offices. Implementing agencies will report to the State Food Stamp Agencies using the paper form. However, in the online version, the codes will appear below the question.
We recommend reordering the questions on the form to have the social marketing section first	Thank you for your suggestions but we do not agree. No other commenters have offered this suggestion.
Instructions for section 7 asks to exclude direct and indirect education information from the charts. In CA, these are not mutually exclusive groupings.	States that conduct social marketing campaigns that include both direct and indirect activities may elect to report these under these categories. However, if direct and indirect contents are also reported, they may not be duplicated under the social marketing section. Training and technical assistance will be provided.
The current form leads to an incomplete and inaccurate picture of work being done in social marketing (efforts leading to policy, systems and environmental change in community and institutional settings and training and TA to network and community partners).	EARS is not designed to capture all of the nutrition education efforts of Implementing Agencies. It is intended to provide data and information on key aspects of FSNE for national compilations. FNS encourages States to report on nutrition education efforts in the annual narrative report including those described here to provide more context and understanding of the scope of FSNE efforts.
Current list of primary intervention strategies in section 7 should include worksite, separate community from school sites etc.	This comment is related to Column H. Primary Intervention Levels. Code F= Other could capture this information. Respondents filling out Code F are required to specify.
More information and examples should be included for question 9. As written, it appears that 9.5 is already being documented in 9.2.	More examples can be provided during training and technical assistance. Note that 9.5 and 9.2 are two different items. 9.5 is for non-government contributions made to the State agency, which requires a waiver. The other one, 9.2, is cash provided to sub-grantees which does not require a waiver. Only the cash contributed to the state agency itself requires the waiver.
For the pilot, agencies used demographic data provided by the schools but this did not always include gender.	States that currently collect this data use class records and/or gender can be visually determined.

Current reporting system does not collect fiscal data in EARS format.	FNS realizes that implementing the new form will be more difficult for some than others and has allowed a two-year implementation period. During this time period, it is expected that changes will be made to current reporting systems to allow for the collection and reporting of EARS data.
USDA should work cooperatively with states to enable ASNNA, CREES and APHSA to design and support a standardized data system so each state does not have to create their own.	The EARS workgroup included representation from all of these groups. FNS will take this suggestion under advisement.
Additional proxy information be allowed in determining target and EARS documentation demographics including reliable agency-specific target level data documenting FSNE-eligible populations from low income people participating in their means tested and anti-poverty programs.	FNS believes it is critical to collect information on recipients of at least some FSNE services (direct education). EARS provides several options for reporting community based FSNE activities and the type of data reported is based on the educational approaches used. Unduplicated counts are only required for direct education. The EARS forms provide guidance for capturing unduplicated counts in schools.

9. Payments to Respondents.

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts or payment will be given to respondents for the provision of data on the EARS form.

10. Assurance of Confidentiality.

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality provided to responding State agencies. However, the EARS form does not report identifying information on individuals. The information collected will be aggregated descriptive information on the State agency’s prior year nutrition education activities funded by the FSP.

11. Questions of a Sensitive Nature.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be

given to persons from whom the information is requested, and any steps taken to obtain their consent.

In accordance with 7 CFR Part 272 (h), State agencies are required to collect and report race and ethnic data on participating contacts on forms or formats provided by FNS. Nutrition education activities include people who are FSP eligible as well as others who may not be FSP recipients at the time of the education session. In order to know the ethnic and racial characteristics of persons receiving nutrition education, this information is included on the EARS form. The information will be used to ensure effective enforcement of Title IV of the Civil Rights Act of 1964 which prohibit discrimination on the basis of race, color and national origin in programs receiving Federal financial assistance. The EARS form uses the revised OMB *Standards for the Classification of Race and Ethnic Data* published by in the Federal Register on October 30, 1997 and adopted by FNS on May 18, 2006.

12. Estimates of Respondent Burden.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

As part of the process used to develop EARS, the form was pilot tested in six states in the winter of 2004. At the conclusion of the pilot test, respondents were asked to report the time spent during the EARS pilot by implementing partner and state. These figures were averaged to calculate the estimated hour burden per State for the collection of the information contained on the EARS form. Costs for respondents’ time are based on average hourly wage rates obtained from approved budgets of a sample of state nutrition education plans for FY 2004. There are no record-keeping requirements imposed by this information collection.

Estimated Annual Reporting Burden and Cost

Number of Responses per Respondents	52
Number of Responses per Respondent	1
Estimated Total Annual Responses	52
Hours per Response	54
Total Annual Burden Hours	2808
Average Hourly Wage Rate	\$30.81
Cost Per Response	\$1,664
Annual Cost Burden in Dollars	\$86,528

13. Estimates of other Annual Costs to Respondents.

Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

The level of adaptation needed to report the information contained in the EARS form varies from State to State. In some States, implementing agency data collection systems are quite sophisticated and can already report many, if not all, of the elements on the form. In others, more changes to the current data collections system will be needed in order to complete the form. Because of this, cost burden to the respondents will vary. FNS plans to allow a two-year implementation period (after introduction of the form in 2008). This will allow States needing to make adjustments time to do so while others, who can more easily adapt their systems, begin reporting. For the purposes of this supporting statement, FNS estimates that 29 states will begin reporting as soon as the form is released and have minimal operations and maintenance costs. Of those remaining, some State agencies are expected to move more quickly than others to adapt or create a system to collect and maintain the information than others.

Estimated Costs to Respondents

		Year 1	Year 2	Year 3	Year 4	Year 5	Total
Early Implementers. (29 States)	Capital and Start-up	0	0	0	0	0	0
Early Implementers (29 States)	Operations and Maintenance	10,000	10,000	10,000	10,000	10,000	\$1,450,000
Mid-term Implementers (14 States)	Capital and Start-up	N/A	150,000	0	0	0	\$2,100,000
Mid-term Implementers (14 States)	Operations and Maintenance	N/A	N/A	20,000	20,000	20,000	\$840,000
Late Implementers (9 States)	Capital and Start-up	N/A	N/A	150,000	0	0	\$1,350,000
Late Implementers (9 States)	Operations and Maintenance	N/A	N/A	N/A	20,000	20,000	\$360,000
Totals		290,000	2,390,000	1,920,000	750,000	750,000	6,100,000

The grand total expense is estimated to be \$6,100,000 over the first 5-year period of implementation. These costs however are not born solely by the State agencies. In the FSP, FNS reimburses States 50% of allowable expenses under FSNE.

14. Estimates of Annualized Government Costs.

Provide estimates of annualized cost to the Federal government. Provide a description of

the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Costs to the government include contracted services for the facilitation of the workgroup, the pilot testing and the development of the online reporting system and training. These one-time costs are outlined below.

Actual Contractor Costs

Contracted Service	Actual Cost
EARS Workgroup Facilitation	\$63,000
EARS Pilot Testing	\$297,000
EARS Online Reporting System	\$633,000
EARS Training	\$42,000

In addition to these costs, a GS-13 nutritionist at headquarters will spend 80 hours per year evaluating, analyzing and summarizing the information submitted on the EARS form from the database. This cost is estimated to be \$2964.80 per year (37.06 hourly rate X 80 hours). Maintenance of the online reporting system is estimated to be \$75,000 per year and annual training and technical assistance costs are estimated to be \$35,000.

15. Changes in Hour Burden.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new data collection request. Therefore, the 2,808 hours constitute a program change.

16. Plans for Tabulation and Publication.

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Data collected by EARS will be shared externally with FSNE stakeholders and internally with FNS Regional offices. FNS may publish consolidated information in order to facilitate and support implementation of policy and process changes suggested by the data collected.

17. Display of Expiration Date of OMB Approval.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The EARS form will display the OMB approval number and expiration date.

18. Exceptions to Certification Statement.

Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

A. Certification Statement

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for the EARS form.

B. Collections of Information Employing Statistical Methods

There are no statistical methods employed in this data collection request.