

**Supporting Statement**

**Education and Administrative Reporting System (EARS)**

**OMB Number #0584-0542**

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## **Terms of Clearance**

In accordance with the Office of Management and Budget, FNS agreed that within one year of the approval of the Information Collection Request (ICR) for the Supplemental Nutrition Assistance Program's (SNAP) EARS form, the Food and Nutrition Service (FNS) submitted a plan for integrating data collection efforts for the SNAP Nutrition Education (SNAP-Ed) annual report and EARS. This plan outlined the approach FNS used to coordinate these reports to minimize the duplication of reporting and to link these efforts.

Per the agreement, FNS sent the Plan for consolidating EARS and the SNAP-Ed Annual Report to OMB in the Fall of 2008. Based on approval, FNS provided OMB with a prototype of the revised Annual report on February 6, 2009.

## **Introduction**

The Food and Nutrition Service (FNS), U.S. Department of Agriculture (USDA) is requesting approval for an extension for the Education and Administrative Reporting System (EARS). EARS provides uniform data and information on nutrition education activities funded by the Supplement Nutrition Assistant Program (SNAP), Section 4001-4002 of Public Law 110-246 Food, Conservation and Energy Act (2008) renamed the Food Stamp Program (FSP) to Supplemental Nutrition Assistance Program or SNAP. Data collected under this 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 FNS. The information will provide an annual description of SNAP-Education (SNAP-Ed) administration and activities in each State. It will improve USDA's oversight capacity and inform SNAP-Ed policies and practices in the future.

**A. Justification** (*Questions and Responses*)

**1. Explanation of Circumstances That Make the Collection of Data Necessary.**

This is an extension without change, of a currently approved information collection. The largest of the USDA nutrition assistance programs, SNAP provided monthly food benefits for over 36.5 million Americans in low-income households in fiscal year 2009, along with nutrition education designed to help Program participants and eligibles choose healthy foods and active lifestyles.

Under current SNAP regulations (7 CFR 272.2 (d)), State SNAP 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 SNAP-Ed is to improve the likelihood that persons eligible for SNAP 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 SNAP agencies contract with one or more "implementing agencies" that develop and deliver nutrition education services. The National Institute of Food and Agriculture (NIFA) formerly known as Cooperative State Research, Education and 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 SNAP-Ed.

Implementing agencies, in turn, usually deliver nutrition education to SNAP 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 SNAP can promote healthy choices. SNAP-Ed represents an important tool for reaching this goal. Over the past eighteen years, the number of State SNAP 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 SNAP nutrition education has also grown from \$666,000 in FY 1992 to over \$380 million in FY 2010 (USDA/FNS, 2010). Currently, FNS has limited information regarding how many SNAP participants and eligibles receive this nutrition education; where and how they receive it, and other basic features about SNAP-Ed delivery. FNS has developed a set of OMB approved SNAP-Ed Performance Measures which are:

- Ratio of SNAP-Ed Administrative Costs to SNAP-Ed Delivery Costs.
- Ratio of SNAP-Ed Direct Education Participants Receiving SNAP Benefits to All SNAP Ed Direct Education Participants.
- Ratios of Persons Reached by SNAP-Ed Social Marketing Who Receive SNAP Benefits to All Persons Reached by SNAP-Ed Social Marketing.

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 SNAP-Ed. EARS standardizes definitions and allows for the collection of uniform data on nutrition education activities funded by the SNAP. A uniform reporting system will enable FNS to get a national picture of the reach and scope of SNAP-Ed and inform management decisions on ways to improve services. This will be accomplished after full implementation when each State agency

submits all applicable components of EARS data which will occur in December 2010. An analysis of this data will be completed in FY2011.

### **Authority for Collection**

Current regulations (7 CFR 275.3 and 275.5) state that FNS has the authority to monitor project areas to determine that SNAP is operating in accordance with the Food and Nutrition Act of 2008, regulations, and FNS-approved State Plans of Operation.

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

EARS will provide FNS, State SNAP agencies, implementing agencies, and other Program stakeholders with much needed information on SNAP-Ed goals, objectives, target audiences, approaches, activities, settings and use of resources by State. Data will be submitted electronically using FNS-759 by all State SNAP agencies annually. State agencies need only report applicable information on nutrition activities applicable to the educational services they provide. The data collection and analyses will provide FNS with the opportunity to monitor characteristics of the participants and nutrition education services being delivered as well as use of resources.

FNS will use the EARS reports to describe SNAP-Ed on a national level including demographic characteristics of participants, the primary focus of SNAP-Ed activities, the location of the activities, the educational methods used and the sources and expenditure of the resources used to conduct SNAP-Ed. 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. The information will inform management decisions, support policy initiatives, and provide documentation for legislative, budget and other

requests. The form is not intended to be used as an evaluation tool but rather to describe activities and develop trends regarding these services.

The information to be collected is organized under four topics: *Direct Education, Social Marketing Initiatives, Indirect Education, and Summary of Financial Expenditures*. States use the EARS form to describe prior years SNAP-Ed activities in the four areas.

**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 allows educators to collect basic demographic information from SNAP-Ed 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 SNAP participation status, age, gender, and race/ethnicity. The information will be used to ensure effective enforcement of Title IV of the Civil Rights Act of 1964

**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 SNAP-Ed. EARS Items 9-10 captures this information.

### **3. Use of Improved Information Technology to Reduce Burden.**

FNS is committed to complying with the E-Government Act, 2002 to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services.

States submit data using a web based online reporting system housed on the FNS Food Program Reporting system (FPRS). Data posted by States to FPRS is uploaded to the FNS National Data Bank and is available for viewing and reports. All 52 States submit data electronically to FPRS at <https://fprs.fns.usda.gov>.

#### **4. Efforts to Identify and Avoid Duplication.**

There is no similar data collection available. Every effort has been made to avoid duplication of data collection efforts, including a review of current reporting requirements data collection and studies.

Before initiating EARS development, FNS reviewed State plans and annual reports to ascertain what data were available and found that while many States submit an annual SNAP-Ed narrative report containing some demographic information there was no consistency. 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.

SNAP 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 persons receiving nutrition education. In addition, SNAP-Ed reaches other segments of the low-income population that are not participating in SNAP.

The NIFA 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 SNAP and not evaluation or outcome data on the program or its participants. EARS is the only federally funded information collection that attempts to collect descriptive data on nutrition education activities of State SNAP agencies and the resources used in providing the services.

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

Information being requested or required has been held to the minimum required for the intended use. Although smaller States are involved in this data collection effort, they delivered the same program benefits and perform the same function as any other States. Thus, they maintain the same kinds of information on file. FNS estimates that one percent of our respondents are small entities, approximately five respondents.

#### **6. Consequences of Less Frequent Data Collection.**

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 SNAP-Ed 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 SNAP.

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. 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," among all Americans, including those served by SNAP.



**7. Special circumstances requiring data collection inconsistent with CFR 1320.5(d)(2).**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**8. Federal Register Comments and Efforts to Consult with Persons Outside the Agency.**

A notice was published in the Federal Register on October 14, 2009, at 71 FR 52736. FNS received one comment.

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 State SNAP agencies, SNAP-Ed implementing agencies, Federal government and academia.

Both informal and formal opportunities for comments were employed at several points in the developmental process.

IAs: Attached are examples of questions and responses generated from Stakeholders input on the EARS Reporting System at the following venues:

- February 17-19 2009-The Association of State Nutrition Network Administrators Winter Conference, San Antonio, Texas
- April 21-22, 2009 Supplemental Nutrition Assistance Program Mid-Atlantic Region Meeting,
- November 10-11, 2009 American Public Health Association, Philadelphia, PA

**9. Payments to Respondents.**

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

**10. Assurance of Confidentiality.**

There is no assurance of confidentiality provided to responding State agencies.

**11. Questions of a Sensitive Nature.**

In accordance with 7 CFR Part 272.7 (h), State agencies are required to collect and report race and ethnic data on participating contacts on forms or formats provided by FNS. (This burden is covered under OMB#0584-0025 expiration date 5/31/2012 using FNS101 and 191). Nutrition education activities include people who are SNAP eligible as well as others who may not be SNAP 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.

**12. Estimates of Respondent Burden.**

There are no changes in burden since the last submission. FNS estimates that 52 States will respond once a year for a total 52 annual responses. It will take approximately 54 burden hours for each State to respond for a total of 2,808 annual burden hours. There are no record-keeping requirements imposed by this information collection. Based on the 2009 Bureau of Labor Statistics (<http://www.bls.gov/bls/wages.htm>) the hourly wage rate for State government, **Nutritionist/Dietitians (Labor category 29-1031** functions performed by State agency staff is \$24.75 per hour. The total estimate cost to respondent is \$69,498.

***Estimated Annual Reporting Burden and Cost***

<b>Affected Public</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Estimated Total Annual Responses</b>	<b>Hours per Response</b>	<b>Total Annual Burden Hours</b>	<b>Average Hourly Wage Rate</b>	<b>Annual Cost Burden in Dollars</b>
State agencies	52	1	52	54	2,808	\$ 24.75	\$ 69,498

**13. Estimates of other Annual Costs to Respondents.**

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 allowed a two-year implementation period (after introduction of the form in 2008). This allowed States needing to make system adjustments time to do so while others, that could more easily adapt their systems, began reporting. For the purposes of this supporting statement, All 52 States will provide complete reporting of all questions on the FNS759 form by December 31, 2010.

***Estimated Costs to Respondents<sup>1</sup>***

	2011 Year 4	2012 Year 5	2013 Year 6	Average Annual cost
Implementers. ( 52 States)	\$69,498	\$71,743	\$74,060	\$71,767
Totals				

The average annual cost is estimated to be \$71,767 over the next 3-year period. Years (2011-2013). The average annualized cost from 2011-2013 is based on the human capital inputs required for reporting. The year 1 through 3 estimates are based upon physical capital startup,

<sup>1</sup>Rate of increase is based upon the annual compounding of the inflation adjusted 2008 – 2009 increase in total compensation for Education and Health Services. Data is from the Bureau of Labor Statistics’ historical Labor Cost Indices (<ftp://ftp.bls.gov/pub/suppl/eci.echistrynaics.txt>)

operations and maintenance which now have decreased. These costs however are not born solely by the State agencies.

#### **14. Annualized Cost to Federal Government.**

There is a significant decrease cost to the Federal Government. In our prior information collection request, the costs to the government included contracted services for the facilitation of the workgroup, the pilot testing and the development of the online reporting system and training. Since implementation, these one-time costs do not exist. Costs to the government include national administrative costs to maintain the reporting system.

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 \$4,693.60 per year (\$58.67 hourly rate X 80 hours). Annual training and technical assistance costs are estimated to be \$25,000 for a total annual cost of \$29,693.60.

This cost estimate was calculated by using data from the Bureau of Labor Statistics' historical Cost Indices. (<ftp://ftp.bls.gov/pub/suppl/eci.echistrynaics.txt>).

#### **15. Changes in Hour Burden.**

This is an extension without change of a currently approved collection. Therefore, the burden hours remains 2,808.

#### **16. Plans for Tabulation and Publication.**

Data collected by EARS will be shared externally with SNAP-Ed 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.**

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

**18. Exceptions to Certification Statement.**

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