

A. 1 Justification

- 1. Explain the circumstances that make the collection of information 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.**

The Expanded Food and Nutrition Education Program is the largest single Extension program in the National Institute of Food and Agriculture's (NIFA) budget, funded as a separate line item at more than \$60 million a year. The data collected through the Nutrition Education Evaluation and Reporting System is a significant component that supports the USDA and NIFA Strategic Goal 5: Improve the Nation's Nutrition and Health, and in particular to support Objective 5.2 Promote Healthier Eating Habits and Lifestyles.

EFNEP is a unique program that began in 1969. It is designed to reach limited resource audiences – especially youth and families with young children. EFNEP operates in all 50 states, the District of Columbia and in American Samoa, Guam, Micronesia, Northern Marianas, Puerto Rico, and the Virgin Islands. Extension professionals train and supervise paraprofessionals and volunteers who teach food and nutrition information and skills to families and youth with limited financial resources.

The impetus for this data collection resulted from conversations in 1990 with staff from the House Committee on Agriculture who voiced their displeasure with the existing data that was being provided on EFNEP and demanded greater accountability and the ability to show the degree to which the program achieved its objectives. As the development of the evaluation system was nearing its completion, an expert panel was convened to look at the data elements and determine those that would be most critical for use by policy makers. The panel included representatives from other USDA agencies with whom EFNEP partners (Economic Research Service and Food and Nutrition Service), the USDA Office of Budget and Program Analysis as well as evaluation specialists from the Federal Extension Service and its university partners. They identified the most valuable behaviors to measure, which then became the core components of the system. Concurrence was received from staff for the House Committee on Agriculture.

The evaluation processes of EFNEP remain consistent with the requirements of Congressional legislation and OMB and supports reporting requirements requested in the Government Performance and Results Act of 1993 (GPRA) (Pub. L. 103–62), the Federal Activities Inventory Reform Act of 1998 (FAIR Act) (Pub. L. 105–270), and the Agricultural, Research, Extension and Education Reform Act of 1998 (AREERA) (Pub. L. 105–185). One of the five Presidential Management Agenda initiatives, Budget and Performance Integration, builds on GPRA and earlier efforts to identify program goals and performance measures, and link them to the budget process. The FAIR Act requires the development and implementation of a system to monitor and evaluate agricultural research and extension activities in order to measure the impact and effectiveness of research, extension, and education programs. AREERA requires a performance

evaluation to be conducted to determine whether federally funded agricultural research, extension, and education programs result in public goods that have national or multistate significance. EFNEP data is also available to the public via Freedom of Information Act (FOIA) requests.

2. 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 general purpose of the Nutrition Education Evaluation and Reporting System (NEERS) is to provide the data needed to assure the quality of the educational program. The system provides a variety of reports that are useful for federal, state (state also refers to U.S. territories) and local management purposes, including the ability to provide diagnostic assessments of participant needs and summarize data for state and national assessment of the program's impact. The specifications for this system were developed collaboratively by a committee made up of state and local representatives from across the United States and was chaired by the EFNEP National Program Leader. They worked over the span of several years to carefully deliberate the pros and cons, benefits and burdens of each component part of the system. The aim was to provide the greatest opportunity for enhanced management of EFNEP operations and capture the strengths and successes of EFNEP, while providing flexibility and minimizing reporting burden.

At the federal level, the data is critical for assuring program accountability. As the reports are submitted from each 1862 and 1890 Land Grant Institution, they are reviewed in the federal office for completeness and specific feedback is given to each institution on the quality of its program. Among the items that may be questioned are low rates of completion by program participants, changes in the number of participants reached, or a drop in program impact. The following example of feedback to a state is indicative of the types of comments shared to support program management decisions:

- The percentage of adults decreased by nearly 25% between FY2009 and FY2010. I noticed that on your FY2009 feedback report I noted a similar trend. Please consider ways to maintain your reach without sacrificing program quality.
- Your checklist data looks great! All of values exceed national averages. I was also glad to see that you were able to document that nearly 60% reported increasing their physical activity behaviors. Excellent!
- Your fruit, vegetable and oil change data look good. Improvements in these areas are in line with the dietary guidelines. Great job! Milk consumption is another area of emphasis for the dietary guidelines. You may want to think about ways to increase consumption among graduates in the coming years.

Each year the national data is analyzed and used to create impact reports (see <http://www.nifa.usda.gov/nea/food/efnep/impacts.html>); identify partners and stakeholders; and respond to congressional questions. It is also used to justify the need for continued and increased funding for EFNEP. State data is compiled by tiers and sent

to the institutions to allow for programmatic comparisons by funding allocation and to inform program management decisions.

At the federal level we also periodically analyze the impact data by race and ethnicity to determine the degree to which the program is effective across low-income populations. This analysis has consistently shown that while there are differences between groups at entry into EFNEP, all race/ethnicities demonstrate a significant improvement in dietary quality and food related practices. In many cases the differences between groups has been narrower at exit than at entry because those with the poorest diets have shown the greatest improvement in dietary intake. Data from these analyses have been shared at national and international conferences, along with lessons learned in delivering an effective nutrition education program.

At the state level, university staff generates state-level reports for state-level stakeholders and use results to guide strategic planning and program management decisions. See Appendix 6 for additional details.

- **What information is collected?**

The Nutrition Education Evaluation and Reporting System (NEERS) is an integrated database system that stores information on: 1) adult program participants, their family structure and dietary practices; 2) youth group participants; and 3) staff. NEERS captures race/ethnicity data following the revised federal guidelines. NEERS adheres to OMB standards for maintaining, collecting, and presenting federal data on race and ethnicity and protecting personally identifiable information. NEERS also collects: latitude and longitude coordinates, Metropolitan Statistical Area and Congressional District information related to program participation. This feature can be used to illustrate program reach and impact in a targeted way. NEERS also includes the MyPyramid Foods Database. This feature allows EFNEP data collection to be standardized and to be consistent with current federal dietary recommendations. Client output reports and state summary reports match MyPyramid food groupings, quantities consumed, and physical activity measures. The system meets user requests for flexibility, enhanced report writing options at the state and local level, and alignment with other federal agencies for more consistent and systematic data collection.

The Adult Switchboard is used to collect basic demographic and program status data about the adult participants. The only required fields are: *Name (or other unique identifier); city and state or zip code; race; ethnicity; gender; residence (central city, farm, etc); subgroup; lesson type; ID code and name of educator providing the lessons; program status (active, educational objective, etc.); and entry and exit date.*

The additional, optional data fields on this switchboard consist of participant's address, phone number, age and racial subcategory; pregnancy check box; nursing check box; household income; public assistance received at entry and exit; number of children by age; number of others in household; highest grade completed; number of lessons; number of contacts; and program status. Personally identifiable information is not transmitted to

the state or federal levels and NEERS is password protected to keep participant information secure.

There is also the option to verify the adult's address. States may use this option to gather information on the adult's congressional district, metropolitan statistical area (MSA) and latitude and longitude coordinates. This is possible through a contract the Land Grant Universities have with **Melissa Data Corp** to provide a Data Quality Web Service for EFNEP. NIFA does not fund this service nor does it (or the institutions) receive the personally identifiable information. Using this service raises no security concerns. The actual data entered at the county level is not transferred or stored anywhere. A data string is sent via a secure **https:** server (not a website) and is 'bounced' against Melissa Data Corp's USPS dataset to verify the location information. This data can be used to illustrate program reach and impact in a targeted way.

The data fields on the Nutrition Switchboard are used to enter food recalls, prepare diagnostic reports for participants, and prepare the diet summary reports of the participants. States/territories are provided 2 options for providing data for this component: Computerized Nutrient Analysis and Food Group Serving Input. If Computerized Nutrient Analysis is chosen, entry of *meal items* is required. Entry of a meal item consists of entering, searching for and selecting the meal item from the MyPyramid Foods Database and then entering the *meal type (midmorning meal, noontime meal or snack, etc.), portion size, and the number of portions.* The system computes the nutrient, food group and Healthy Eating Index values automatically. If Food Group Serving Input is chosen, food group tabulations are done externally and the totals for the day are entered. The underlying databases that support this module are MyPyramid data files, which include more extensive lists of foods and more nutrients than the previous version. Output reports reflect the MyPyramid recommendations.

The Staff Switchboard captures basic information about the professionals, paraprofessionals and volunteers associated with the program. The only required fields are the *ID; gender; ethnicity; and race.* The additional data fields on the this switchboard consist of: address, city, state and zip code; telephone number; annual hours spent with adults by program; annual hours spent with youth; and for volunteers - age code (adult or youth), the ID/name of the paraprofessional he/she worked with, and his/her role(s). Personally identifiable information is not transmitted to the state or federal levels.

The Youth Group Switchboard captures basic demographic data about the youth participants reached as a group. The only required fields are: *group ID; program type; delivery method; city and state or zip code; group leaders; and start and end dates.* The additional data fields on this switchboard consist of group name; name; address; phone number; number of meetings, number of contact hours, number of youth in other 4-H programs; and number of youth by gender, grade, residence (central city, farm, etc), ethnicity, race and racial subcategory. There are additional data fields to capture data on youth impacts. These impacts include the percentage of youth who improved knowledge or behavior related to one or more of four outcome areas: food choice; essentials of nutrition; food preparation/food safety; and food resource management. As with the

adults, there is the option to verify the youth group's location. If a state wishes, it can use this option to gather information on the youth group's congressional district, metropolitan statistical area (MSA) and latitude and longitude coordinates. As discussed in the Adult Switchboard section, the Land Grant Institutions have a contract with **Melissa Data Corp** to provide a Data Quality Web Service for EFNEP. As stated previously, using this service has absolutely no security concerns (see section on the Adult Switchboard for additional information). Personally identifiable information is not transmitted to the state or federal levels.

The Behavior Checklist Switchboard is used to capture data on behavior change between entry and exit from the program. When this feature is used for adult participants, states must ask the participant 10 core questions. Each question includes five response options: Do Not Do, Seldom, Sometimes, Most of the Time, or Almost Always, (No Response or Not Applicable is also permitted). If a State chooses, it can collect additional information from participants by selecting any question from an approximately 200 item database which was developed for the states to support their sharing of additional questions with each other. The additional questions are of four types: 4-Choice, 5-Choice, Logical, or Numeric.

The Interagency Cooperation screen is used to capture data on collaborations and other sources of funding. Optional fields include: number of WIC offices and number of WIC offices served; number of Supplemental Food Assistance Program (SNAP) offices and number of SNAP offices served; number of agreements; number of coalitions; amount of grant dollars, contribution and other dollars and their source of funds.

- **From whom will the information be collected - reported or recorded?**

NEERS is an integrated data collection system composed of county, state, and federal sub-systems. County level data is exported electronically to the state-level system. University staff generates state-level reports to report/respond to state-level stakeholders and to guide program management decisions. They also export state level data electronically to the federal office for state and national assessments of the program's impact. The state compiled data is aggregated using statistical software. The National Data is used to create national reports which are made available to the public.

- **What will the information be used for - provide ALL uses?**

Each level of users (county, state and federal) prepares reports for their specific needs.

At the county level, individual reports are shared with participants as part of their learning experience. At the county and state levels the data is also used as an educational self-assessment tool with program participants (county level), for programmatic oversight and for strategic planning. It is also used to report to university administrators, state legislators, congress, and other stakeholders. Detailed examples of how county and state level data is used is included in Appendix 6.

At the federal level, the information collected is used principally to provide national programmatic oversight of “all reasonable efforts” by staff and volunteers to reach underserved and minority groups, thus assuring that the program serves the intended audience and the quality of the program is maintained, both statewide and nationally. In doing so, emerging interest and trend analyses can be performed from this information to identify new topics, issues, delivery modes, audiences, etc. for program management. Information from state reports are also used to evaluate nationwide and statewide impact and identify needed staff development and/or curriculum enhancements. An example of feedback given to the states is included above. Feedback to the states on their data emphasizes the program’s high level of accountability and has served to redirect or modify program implementation at the state level

The data is also used at the federal level to report the impact of the program to agency Administration, agency and state colleagues, congressional staff, groups and task forces of interest, other federal agencies and the public. Examples of how the data is reported can be found at <http://www.NIFA.usda.gov/nea/food/efnep/impacts.html>. A sample of the USDA NIFA EFNEP FY 2010 Program Impact report is included in Appendix 1.

- **How will the information be collected?**

Information is currently collected using the Nutrition Education Evaluation and Reporting System. More information on this software can be found at www.NIFA.usda.gov/neers5. As indicated above, the system consists of distinct, yet integrated software sub-systems. The system is user-friendly, provides powerful filters for aggregating the data, complies with OMB standards for collecting race and ethnicity data, and protects personally identifiable information. It also improves the quality of data on dietary improvements by incorporating the MyPyramid Foods Database.

- **How frequently will the information be collected?**

Information is collected by the federal office on an annual basis.

- **Will the information be shared with any other organizations inside or outside USDA or the government?**

As mentioned above, aggregated national data is shared via hard copy and web-based reports to the agency Administration, agency and state colleagues, congressional staff, groups and task forces of interest, and other federal agencies. Versions of national data impact reports are also available on the EFNEP website at <http://www.NIFA.usda.gov/nea/food/efnep/impacts.html>. State data is compiled by tiers and sent to the institutions so they can see how their results compare to institutions with similar funding levels. This helps support program management decisions. EFNEP data is also available to the public via Freedom of Information Act (FOIA) requests.

- 3. 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.**

NEERS is utilized electronically. Data can be stored on a disk, hard drive or secure network, and users have the option of sending data without personally identifiable information from county to state or from state to federal electronically or via surface mailed disk. Electronic advancements have allowed all states to send their data to the national office electronically. This supports the Paperwork Reduction Act because states do not send hard copies of their state data or disks. In addition to complying with the Paperwork Reduction Act, electronic transfer also decreases burden to states. The national office hosts a secure File Transfer Protocol (FTP) site. States can enter the FTP host name, subfolder, user name and password into NEERS and export their state data directly to the FTP site. The national office can then securely log on to the FTP site and retrieve the state data files for use at the national level. This reduces burden to states and the national office.

- 4. 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.**

With NEERS, states have an easier way to track case loads, staff hours, volunteers, etc. All of this information is maintained in the system and thus reduces the number and types of forms that would have normally been required in order to maintain all of this data. The various reports that are available through the system are only generated as needed. These include: Adult Summary Reports, Diet Summary Reports and graphs, Behavior Checklist Reports and graphs, Youth Summary and Youth Delivery Mode Reports, Professional and Paraprofessional Summary Reports, Volunteer Summary Reports, and Interagency Cooperation Reports. At the local county level, additional reports can be generated at the user's request. For example, staff can generate a one-day recall report for program participants related to their dietary intake or their food-related practices. This is a useful teaching tool and helps program participants see what practices are desirable and where they may want to learn more. NEERS is flexible and has user-friendly, on-demand report writing capabilities. The states have indicated these features are desirable and needed for program management and to have the option to provide feedback to the program participants.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

Small businesses are not impacted by the NEERS data collection.

6. Describe the consequences 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.

It would be extremely difficult for the national office to compare, assess, and analyze the effectiveness and the impact of EFNEP without the annual collection of data. Also it would be difficult for the national office to provide appropriate guidance and leadership without having an awareness of the states' programming efforts and effectiveness. The states and counties use this data on a year-round basis, and find it to be a time saving and valuable support for their educational programs.

The on-going nature of the data collection allows all levels of users to quickly detect undesirable changes in program outcomes or audiences reached, thus facilitating corrective action sooner. It also allows for the introduction of new program emphases, such as the need for increased physical activity to prevent obesity, when national concerns are identified.

7. 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;**

Only annual reporting is required.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

The due date of November 1 has been the same for many years, and any changes to the information to be collected are specified by June 1 of the prior year.

- **requiring respondents to submit more than an original and two copies of any document;**

No documents are required or permitted. States are encouraged to send their report electronically through the secure File Transfer Protocol (FTP) website or as an email attachment. If this is not possible then they may send a disk. No paper copies or additional copies are required.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Respondents are encouraged to maintain records for three years, as per the Administrative Manual for the Smith Lever Act, or to follow their own institutional record disposition system, if longer.

- **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;**

States have the option of providing data on a sample of their clients; however they are required to work with a statistician to assure that the sample is representative of the total population reached. The "universe of study" is the population reached.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

This collection does not impose this requirement.

- **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;**

At the county level, staff is entrusted with personal information about the program participants with whom they work. Information such as the types of public assistance they receive, who they are, where they live, and their personal behavior in regard to nutrition, food resource management and food safety is kept confidential. Only personnel with a "need to know" should have access to the individual records. NEERS is password protected to maintain confidentiality. There are two levels of users: Users and Managers. "Users" are data entry staff and cannot manage security; they can only change their own password. "Managers" have authority to create new users for the system. Personally identifiable information is removed from the database when data is sent forward from the county to the state level. Therefore no personally identifiable information is available at the state or federal levels. Aggregated data at the state and federal levels are the only form in which data is released without permission from the participant.

- **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.**

No proprietary or confidential information is collected by NIFA.

8. **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.**

NIFA' notice and request for public comment was published in the Federal Register (Vol. 77, No. 88) May 7, 2012 on pages 40830-40831. No comments were received from the public.

- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Multiple task groups were formed to assist in developing NEERS and to provide input. Members of the task groups were comprised of representatives from each region and represented diverse audiences. For example, a work group was formed to focus on the behavior checklist component. Dozens of states pilot tested the system to determine if it met their needs and State coordinators (which comprises of at least 1 person from each state) maintained active voices at all times through teleconferences and face-to-face meetings. A team of university partners was actively involved in testing the new software, contributing to the manual development process, and identifying training needs so state needs could be met.

As noted above [Justification, A.1], in 1990 a new approach was taken for data collection in EFNEP. The National Evaluation and Reporting Committee queried states to find out what records were being created in state and county offices to assure effective program implementation. They also asked what other data would be desirable to improve program accountability, eliminate duplication of effort, and facilitate program improvement. This resulted in a bottom-up approach that recognized that data quality is improved when the person responsible for supplying the data receives a benefit for their effort. Over the intervening years, the system has grown in response to **user** needs.

It is important to note that neither NEERS nor its preceding system was designed to solely meet federal needs. The federal data needs were incorporated in this process, but were developed to be in concert with what would be needed locally, and to have data only flow to the point of need. For example, all personally identifying information is retained only at the county office on computers with password protection to assure confidentiality and security of the data. The personally identifiable information is removed by NEERS when data is exported to the state and therefore federal offices. State level data is used for statewide management and oversight and to report to stakeholders within the University and the state. At the federal level, reports are prepared for the nation as a whole, for regions, or subgroups such as those also receiving WIC benefits, in order to demonstrate the effectiveness of the program and assure program quality.

Throughout the process a constant principle for data collection has been to make sure only data which is needed is collected. No data fields are added unless they serve a broad need. Also, required data must feed in to one or more standard output reports.

There are a number of standard reports available within the system to meet user needs. Report writing functions are streamlined, so it only requires a few clicks of the mouse to

prepare a report. This reduces the overall reporting burden, since there is no need to do extensive external data analysis. Examples of these standard reports are: feedback or diagnostic reports that the nutrition assistants use with their clients to show how their diet and food practices compare to federal guidelines; reports to quickly scan the records and detect possible data entry errors; and summaries for each nutrition educator which can be used as part of performance evaluations or assessment of training needs as examples.

One additional principle which also played a significant role in the design of the system was the need for flexibility. EFNEP is in all 50 states, the District of Columbia and the 6 US territories and the number of participants, amount of resources and the skill level of staff can differ widely. Thus many fields in NEERS are optional, but can be used if desired. Also, there are different ways states can collect and enter data, such as the two options states have for entering diet recall data (see response to question 2 above). States can choose which method will best serve their needs without compromising the ability to collect and aggregate meaningful data nationally.

- **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Constant consultation between the national office and the state coordinators has occurred since the inception of NEERS. As stated in the response to question #2, representative committees were formed consisting of state coordinators, and all of their feedback, as well as their needs were considered before changes were made to the system. The software testers were also able to provide input on the functionality of the system. With the launch of NEERS NIFA held a series of teleconferences in which system users and the federal office discussed questions, concerns, and possibilities in using the software. States shared special requests or “wish lists” for the future, and the federal office provided updates and other information that was important for the users to know.

A listserv specific to NEERS has been created to keep coordinators and state-level data staff informed of changes, advancements, and issues with the system. The teleconferences and the listserv help keep a two-way communication process and provide the federal office a wealth of information from the users. In addition, the agency website includes a NEERS webpage (www.nifa.usda.gov/neers5), which contains Frequently Asked Questions, information on software updates, supporting documentation, and other useful information. There is also a help-desk through which users can receive technical support, pose a question or offer suggestions for improving the software.

The names and contact information for 3 people surveyed are below. Please note these names are associated with the burden estimates with the previous system. Move to question 8.

Elaine Mayes, WA - emayes@wsu.edu

Ruby Cox, VA - rbycox@vt.edu

Scottie Misner, AZ – misner@ag.arizona.edu

9. Explain any decision to provide any payment or gift to respondents, other than remunerations' contractors or grantees.

No payments or gifts have been, are, or will be provided to respondents.

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

No assurance of confidentiality is made to state respondents, since they are reporting data with no personally identifiable information of any program participants.

11. 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 to be taken to obtain their consent.

No questions of a sensitive or personal nature are included in NEERS. OMB Standards for the Classification of Federal Data on Race and Ethnicity are followed for the EFNEP enrollment data. Some information gathered from clients at the county level may be considered sensitive in nature; however it is only received in aggregation with no personally identifiable information associated by NIFA.

12. 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. 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.

The burden takes into account only the information collected in aggregate from the states and the record keeping activities that take place in order to provide the aggregated data. NIFA is not including as part of the federal burden surveys that occur at the local level. That information is used by the county and state levels for their own program management, impact and accountability.

Burden estimates are reflective of the previous version of the data collection system. Hours were updated based on the addition of the University of the District of Columbia to EFNEP. This increased the number of institutions from 74 to 75.

Number of Respondents: 75 reporting the aggregated data
Frequency of Response: 1
Average Hours/Response: 1,243 hours
Total Annual Burden: 93,225 hours

Details on how this value was calculated are in Appendix 3.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage categories.

The total annual cost for the respondent's burden hours is estimated to be \$1,449,636.

13. 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.

There is no annual cost burden to respondents or record keepers. At the implementation of the NEERS in 2006, states were aware of the system requirements that would be needed for the system. At that time, requirements were the minimum of a 32 bit CPU or compatible desktop, tower model, or laptop personal computer (PC) running Windows XP/2000, which states were already using. NEERS is compatible with Office 2007 and Office 2010 and it can be run on Windows 7 if the software is installed under a Virtual XP mode.

There is no software cost to the states or counties. Copies of the software were made available to the states and counties as needed. Updates to system software are made available to states and counties as needed via internet.

14. 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.

The total annual cost to the federal government is estimated to be \$51,217. Details on how this value was calculated are in Appendix 3.

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

The increase in total burden is a result of a statutory change that added the University of the District of Columbia to the group of eligible institutions. Although the legislation passed in 2008, it took time for USDA and NIFA to work through the implementation of

the statute. We did not know of those changes and what they would mean at the time of our previous submission. Further, implementation by the University of the District of Columbia (UDC) also took time. EFNEP was not fully functional at UDC until FY 2011. Therefore the number of respondents increase from 74 to 75, responses increased from 74 to 75 and the burden hours from 91,982 to 93,225.

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

USDA provides funding for the EFNEP impact reports. Impact reports include a brief synopsis of the national data including aggregated demographic and food behavior change data. Occasionally they will also include personal testimonies and success stories from selected state programs. Copies of the report are shared with the agency administration, colleagues throughout the agency, and various task forces and committees, and decision makers. They are made available to the public via the NIFA, EFNEP website – see <http://www.NIFA.usda.gov/nea/food/efnep/impacts.html>.

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

NIFA will display the OMB approval number and expiration date on the EFNEP web site and the information will be shared with all users. The approval number will also be displayed on the main screen of the software.

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.