

Supporting Statement for  
Paperwork Reduction Act Submission  
OMB No. 0584-0542

Form FNS-759, Education and Administrative Reporting  
System (EARS)

**Prepared by:**

**Kelly Stewart**  
U.S. Department of Agriculture  
Food and Nutrition Service  
3101 Park Center Drive, Suite 824  
Alexandria, VA 22302  
703-305-2425  
[kelly.stewart@fns.usda.gov](mailto:kelly.stewart@fns.usda.gov)

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## **A. 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.**

This is an extension without change, of a currently approved information collection. The largest of the USDA nutrition assistance programs, the Supplemental Nutrition Assistance Program (SNAP) provided monthly food benefits for over 46 million Americans in low-income households in fiscal year 2012, 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 to receive SNAP benefits and other means-tested Federal assistance programs.

States must submit an annual nutrition education plan to FNS for approval. The goal of SNAP Nutrition Education (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 (2010)* and *MyPlate*.

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 and obesity prevention services to SNAP participants and others eligible 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. In FY 2013, 52 State agencies received 100 percent federal funds to provide nutrition education and obesity prevention services. Federal funding approved for SNAP nutrition education has also grown from \$666,000 in FY 1992 to \$388 million in FY 2012.

EARS ensures that FNS has information regarding how many SNAP participants and others eligible, 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 allows 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 and

obesity prevention activities funded by SNAP. A uniform reporting system enables FNS to obtain a national picture of the reach and scope of SNAP-Education and inform management decisions on program improvements.

### **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. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection**

EARS provides FNS, State SNAP agencies, implementing agencies, and other Program stakeholders with much needed information on SNAP-Education goals, objectives, target audiences, approaches, activities, settings and use of resources by State. Data is 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 provides FNS with the opportunity to monitor characteristics of the participants and nutrition education services being delivered as well as use of resources.

FNS uses the EARS reports to describe SNAP-Education on a national level including demographic characteristics of participants, the primary focus of SNAP-Education activities, the location of the activities, the educational methods used and the sources and expenditure of the resources used to conduct SNAP-Education. EARS allows FNS to aggregate data and information that provides 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 and 10 capture this information.

**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.**

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 State agencies submit data electronically to FPRS at <https://fprs.fns.usda.gov>.

**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 Question 2**

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 Web-based Nutrition Education Evaluation and Reporting System (WebNEERS). 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 and obesity prevention activities



funded by 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. 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.**

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. 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.**

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 also allows 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 and meeting Objective 4.2 in the USDA Strategic Plan, "Promote Healthy Diets and Physical Activity Behaviors," among all Americans, including those served by SNAP.

**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;**
- **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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**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.**

A notice was published in the Federal Register (2013-07958) on April 5, 2013, at 78 FR page 20613. FNS received no comments.

**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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.**

Consultation with users of the FNS-759 EARS form has been a continuous process over the years with stakeholders including representatives from State SNAP agencies, SNAP-Ed implementing agencies, Federal government and academia.

Recent discussions regarding SNAP-Ed reporting requirements have occurred at the Association of SNAP-Ed Nutrition Networks and other Implementing Agencies (ASNNA) Conferences, which took place in Arlington, VA on the following dates:

- ASNNA Conference, February 15-18, 2011
- ASNNA Conference, February 7-9, 2012
- ASNNA Conference, February 4-7, 2013

The FNS-759 EARS form was also discussed during the SNAP-Ed Coordinators Meeting that took place in Alexandria, VA on October 24<sup>th</sup> and 25<sup>th</sup>, 2012

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

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

**10. 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.

**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.**

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 8/31/2015, using FNS-101 and FNS-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. 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.**

There are no changes in burden since the last submission. FNS estimates that 52 State agencies 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.

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

Based on the 2013 Bureau of Labor Statistics (<http://www.bls.gov/bls/wages.htm>) the hourly wage rate for State government, **Nutritionist/Dietitians**, functions performed by State agency staff is \$27.00 per hour. The total estimate cost to respondent is \$75,816.

**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	\$ 27.00	\$ 75,816

**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 questions 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 are no capital/start-up or ongoing operation/maintenance costs associated with this information collection. Now that this collection has been implemented during the past three years, there is no longer any cost associated with this information collection; therefore, the \$71,767 cost assessment is no longer needed for this collection.

**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.**

A GS-13, Step 5 nutritionist at the FNS National Office spends 80 hours per year evaluating, analyzing and summarizing the information submitted on the EARS form from the database. This cost is estimated to be \$3,868 per year (\$48.35 hourly rate X 80 hours). Annual training and technical assistance costs are estimated to be \$25,000 for a total annual cost of \$28,868.

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

This is an extension of a currently approved information collection. There are no changes to the information collection since the last OMB approval.

**16. 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 SNAP-Ed stakeholders and internally with FNS Regional offices upon request.

**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.**

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

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."**

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