

# PUBLIC SUBMISSION

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## General Comment

Thank you for the opportunity to provide suggestions for improving the SNAP-Ed EARS forms through 2018. This system is vital to show the reach, breadth and depth of all SNAP-Ed activity, as well as for dispelling past perceptions that there have been no demonstrable results.

While it is not yet possible to include outcomes in EARS, there are other efforts well underway to do so. It is greatly appreciated that USDA is working in partnership with its many stakeholders to achieve a reporting system that captures and characterized the impressive results that are being reported throughout the country.

See attached file(s)

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## Attachments

EARS Comments, Table 10-16-15

**Comments to the Food and Nutrition Service  
United States Department of Agriculture  
Education and Administrative Reporting System (EARS)  
Regarding Sections in the Proposed EARS Forms**

**Submitted by  
Susan B. Foerster, MPH  
Director, Network for a Healthy California (Ret)  
October 16, 2015**

**PLAN OF OPERATION: TOPIC and SUBSECTION**

**State SNAP-Ed Overview (p 1)**

**OMB Burden Statement:**

A reporting system useful to funders, practitioners, partners and research is essential, as is upgrading of the outdated EARS system in accord with expanded priorities, increased scope, and capped funding afforded through the 2010 Healthy, Hunger-Free Kids Act. As in the past, however, the reporting burden continues to be much higher than the estimated 3,180 hours. With 124 state implementing agencies, 50+ state agencies, and several thousand local agencies required to report activities as per EARS, not only are thousands of staff required to spend time reporting and compiling the data on a continual basis, but also there are costs of expert personnel to oversee the systems and of automation for adapting existing systems and developing new ones. These would amount to many, many more hours than 3,180.

To keep costs down, increase accuracy of the numbers, and provide a return on investment to all stakeholders who collect data, the updated system should be kept as comparable to the present EARS system and greatly streamlined. Data that are not used now, do not have a clear purpose, or that cannot be collected accurately should be dropped. EARS is critical for SNAP-Ed to be accountable, but its purpose should be understood as policy relevant and only to show the reach, dose, locations, and types of activities paid through SNAP-Ed funds.

Other reporting systems are needed for results attributable to SNAP-Ed and for intervention research. These may be developed using indicators as the SNAP-Ed Evaluation Framework and its Implementation Guide are finalized and in accord with the annual editions of the *SNAP-Ed Interventions Toolkit*.

The following recommendations are aimed at achieving these goals.

**OVERALL:**

For all tables in the EARS, it is critical for the population segments served by SNAP-Ed to be clearly and consistently defined and for demographic data such as SNAP participation, income, race/ethnicity, gender and age to be collected only when needed for defined policy purposes. Data should be recognized as accurate in accord with conventional public practice and the categories should be consistent with the *SNAP-Ed Guidance*.

The four income segments served by SNAP-Ed that should be consistent in all EARS forms and used as appropriate for the category of information being collected. The four income-related segments are:

- SNAP participants (ppts) (persons participating in SNAP within a 12-month period of receiving SNAP-Ed service), could also known as *Very Low Income with SNAP*;
- SNAP-eligibles (persons <130% FPL, whether participating in SNAP or not), could also be known as *Very Low Income without SNAP*;
- SNAP-Ed eligibles (people with incomes <185 % FPL, including SNAP ppts), could also be known as *All Low Income*, and
- Others (>185% FPL), also known as *Middle and Higher Income*. This category should not be called High Income.

The methods for determining the characteristics of each segment should draw from conventional secondary sources

rather than *de novo* collection wherever possible. These may include the census, school meal eligibility for children, means-tested statistics from reputable federal, state and private sources, such as food banks and commercial marketing, or specific state or local data where available. At a federal level, the best sources and methods for calculation in SNAP-Ed should be defined so that data are collected consistently, can be pooled nationally, and allow comparisons across state lines, SIAs and other implementation categories such as counties, channels or demographic segment. Where 'alternative targeting methods' are needed, these methodologies also should be standardized at the national level.

## 1. Number and Names of Implementing Agencies

### (a) Number of SNAP-Ed eligibles within your State

It is recommended that within any given state, the same set of statewide demographic estimates be used each year by all State Implementing Agencies (SIA). The State SNAP Agency (SA) may make this determination, or it could delegate responsibility for determination to one of the SIAs, depending on where demographic expertise matching the needs for comprehensive SNAP-Ed reporting resides.

### (b) Number of SNAP-Ed eligibles reached through direct education

It is recommended that **Reach** of direct education be defined in three ways:

- **Number of persons (unduplicated count)** with incomes <185% FPL, whether or not they have participated in SNAP over the last 12 months, who participated in Direct Education, and
- **Number of educational contacts/repeated exposures** to such Direct Education, as with series education.
- **Number of persons who participated in Direct Education (not unduplicated)** in qualified SNAP-Ed settings where data by income, age, gender, race/ethnicity are not readily available. It is likely that few people participating in formal education would also be participating in other Direct Education.

It is recommended that Direct Education be defined as participation in a pedagogical experience with a defined lesson plan or curriculum and interactive contact with a qualified educator, including peer educators.

If needed for policy purposes and feasible to collect because systems have been developed, there may be subtotals of:

- SNAP pts ( $\leq 130\%$  FPL);
- Very Low Income people without SNAP in last 12 months ( $\leq 130\%$  FPL),
- Other Low Income (130-185% FPL), and
- Middle and Higher Income ( $> 185\%$  FPL).

### (b) Number of SNAP-Ed eligibles reached through social marketing

It is recommended that this category be reported separately from – not combined with -- Direct Education or PSEs. In accord with the *Guidance*, social marketing may be narrowly defined as consisting of specific mass communications activities and be calculated using conventional commercial marketing methods. A better way would be to define social marketing as a comprehensive approach in which direct education, marketing and PSE are integrated to support healthy change by fostering positive influences and minimizing barriers to healthy behavior in the five spheres of influence the Social Ecological Model: individuals, social and peer groups, institutions, multiple channels within a community, and larger society.

Social marketing is targeted to specific population segments, but within those, it aims to reach as many people, as many times and in as many ways as possible where behavioral decisions are made, both intentional and automatic. Social marketing counts should have three types of categories:

- **Reach**, defined as the number of SNAP-Ed eligibles (<185% FPL) and Others (>185% FPL) people who experience each mass communication method;
- **Impressions** defined as the number of times a media message touches the members of the audience, as with repeated views of an ad or billboard; and
- **Channels**, defined as the types of organization within which tailored social marketing interventions are delivered, such as retail stores, educational institutions, or worksites. Within a *channel*, there may be multiple *systems* that a SNAP-Ed program works with (different grocery store chains, different school districts, or different companies) and *sites* where the positive exposure/support may occur (number of stores, schools, or worksites).

Each type of mass communications method has specific metrics used by commercial marketers. Methods relevant to SNAP-Ed include:

- **Advertising** (television, radio, outdoor, transit, other) either paid or public service,
- **Public relations**, also known as earned media, and
- **Electronic media** (interactive websites and social media like facebook and twitter, including those that are in-language).

Posters, brochures, cookbooks, recipe cards, and Nutrition Education Reinforcement Items (NERI) can be defined as **elements** that may be used consistently for Direct Education, Social Marketing and PSE. It is recommended that these elements be dropped as counts within EARS.

**(d) Number of SNAP-Ed eligibles reached through policy, systems, and environmental change interventions**

Similarly, it is recommended that Policy, Systems and Environmental (PSE) activities be counted separately from Direct Education and Social Marketing. PSEs need not be confined to channels or systems where Direct Education occurs, but rather as any channel, system or site where large proportions of SNAP-Ed make decisions about food or physical activity and where a partner organization itself has agreed to enter the *Adoption* phase for PSE changes. .

*Adoption* does not mean that full-scale implementation has occurred but rather it counts the number of sites in each channel where there's a commitment to work with SNAP-Ed, such as by signing on to implement evidence-based interventions with PSEs from authoritative sources including, but not limited to, those in *SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States*.

PSE activities could be counted in four ways, as:

- **Projected Reach**, defined as the estimated number of people who are being exposed to positive change in each channel where SNAP-Ed interventions are conducted. These could be reported as the number of SNAP-Ed eligibles (<185% FPL) and All others (>185% FPL),
- **Channels**, defined as the number of organizational categories in which PSE interventions are being delivered through SNAP-Ed,
- **Systems**, defined as the number of organizations within a channel that are working with SNAP-Ed to introduce positive PSE changes,
- **Sites**, defined as the number of geographic locations in a system that have agreed to introduce positive PSE changes, and

Examples:

Retail Food Stores. An SIA is sponsoring a campaign for the Large Food Store *Channel*, working with three supermarket *Systems*/companies, which—in turn—make PSE changes only in the subset of *Sites* meeting SNAP-Ed criteria. The *Projected Reach* for this *Channel* would be in two categories: the estimated number of customers who are Low Income (either SNAP ppts/SNAP-Ed eligibles) and Other shoppers in all sites where the company agreed to introduce PSE changes.

Schools: An SIA undertakes an initiative of evidence-based, comprehensive interventions in the school *Channel*. It identifies 20 school districts/*Systems* that agree that their district will participate. In turn, a subset of individual, SNAP-Ed eligible schools/*Sites* signs on to work with SNAP-Ed and conduct the interventions. The *Projected Reach* for this channel would be the number of students that will be exposed when the intervention is implemented. Where available, the *Projected Reach* could be in two categories: the estimated number of students qualifying for FRPM and all other students.

In accord with the RE-AIM model (Reach, Adoption, Implementation, Effectiveness, and Maintenance) and the complexity of measuring change among hundreds of systems, it may be feasible for EARS at this time to count only *Reach* and *Adoption*. Over time and with experience using metrics in the Interpretive Guide of the new SNAP-Ed Evaluation Framework, it may be possible to select a limited number of metrics that occur and more mature stages of the model.

**(e) Percentage of SNAP-Ed eligibles reached in your State through each of the above intervention types (direct education, social marketing, PSE)**

It is recommended that the categories above be reported and compiled separately as numerators, and that percentage calculations be based on statewide denominators established for each Federal Fiscal Year (FFY) by the State Agency or its designated SIA.

**(f) Estimated percentage of SNAP-Ed funds expended to reach SNAP-Ed eligibles through each of the above intervention types (direct education, social marketing, PSE)**

The need for and uses of these data are not stated, and the expenditure data provided in EARS public use tables have not been useful. It is recommended that for scientific and practical reasons, this indicator be redefined.

It is recommended that this metric be replaced with estimates of the amount of funds contracted to agencies in the three sectors: Public, non-profit and business. Authoritative bodies have concluded that large-scale changes in healthy eating, physical activity, and obesity require the sectors working together to build on their respective expertise, resources and influence. SNAP-Ed funds can be used to enable or incent such collaboration. There is a track record showing that using the funds in this way leverages their influence well beyond the public sector. In contrast to cost breakouts by type of activity, expenditures by type of agency funded are readily available in any SNAP-Ed budget.

Reasons for dropping the percent of funds by type of activity include: There is great variation in the needs of different states, as well as the mix of SNAP-Ed activities that different types of SIAs sponsor, e.g., Extensions, non-profits, health departments. There are no known scientific standards for projecting what the best blend of expenditures should be, nor are there standardized methods for assigning cost estimates. Many times, SNAP-Ed funds support only part of intervention activities. Finally, with the 2010 HHFKA, it is no longer necessary to confine activity to traditionally-defined nutrition education.

**DIRECT EDUCATION (p 2-7)**

**(a) Table: SNAP-Ed PARTICIPANTS by Age and SNAP Status and reporting of actual vs. estimated counts (p 3)**

For SNAP/income categories, the following categories of SNAP-Ed participants are recommended:

- Number of *SNAP participants* (ppts) (persons participating in SNAP within a 12-month period of receiving SNAP-Ed service), could also known as *Very Low Income with SNAP*;
- Number of *SNAP-Ed eligibles* (people with incomes <185 % FPL, including SNAP ppts), could also be known as *All Low Income*, and
- Number of *Others* (>185% FPL), also known as *Middle and Higher Income*. This category should not be called High Income.
- Total number of people receiving direct education through SNAP-Ed, defined as All Low Income + Others.

For policy purposes, summaries could be presented as All Low Income and All people receiving Direct Education, of whom SNAP ppts are a subtotal.

**(b) Table: SNAP-Ed CONTACTS by Age and SNAP Status and reporting of actual vs. estimated counts**

Due to the heavy reporting burden of tracking by SNAP/income status, it is recommended that all counts of contacts/repeated exposures be shown as estimates. It is recommended that within Direct Education, specific demographics be obtained only for initial encounters.

The SNAP/income categories should be identical to 2a, above.

**(3) Direct Education**

**(i) Directions and tables 3a and 3b (page 4)**

It is not clear what policy relevance gender has in SNAP-Ed. Unless clear policy requirements are stated, it is recommended that reporting of counts and contacts by gender be continued only for adults, and the 250 word-limit explanation of estimation methods should be dropped entirely. If policy interests warrant, gender statistics for adults could be stated as actual counts where readily available and estimated counts for all others. In settings for children and youth, gender is consistently about half male and half female, so the reporting burden is not warranted.

**(4) Direct Education: Race and Ethnicity, reporting of actual vs. estimated counts**

**(i) Directions and Table (page 5)**

Race/ethnic designations have become increasingly complex and labor intensive, and it is not clear that for policy purposes actual statistics are more valuable than estimates. Therefore, it is recommended that for purposes of Direct Education going forward, the data be collected intermittently. For FFY 17, past year data could be used for years where data are not collected. In future, actual race/ethnic statistics for Direct Education could be collected intermittently, perhaps every three years or at the end of a multi-year state plan.

The reporting of single or multiple race/ethnic categories should be consistent with those of the Bureau of Labor

Statistics or the Census Bureau, as these also are used in state needs assessments. If states have specific requirements (such as Filipino in California), then those categories should be reported as per appropriate federal designation.

**(5) Direct Education: Directions and Table Number of Delivery Sites by Type of Setting (p 6)**

This is one of the most important fields in EARS, as it shows the diversity, breadth and depth of SNAP-Ed service in low-resource community settings, and it is easy and accurate to count. It is recommended that the channels, systems and sites align with those that have been reported in the past and that are evolving as key locations for the future, as per the SNAP-Ed Evaluation Framework. Categorized by the six domains of Eat, Learn, Work, Live, Play and Shop, the following channels/systems and settings are recommended as standard categories in Direct Education, Social Marketing and PSEs, as follows:

- **EAT:** Restaurants, Senior Centers/Congregate Meals, Other (specify)
- **LEARN:** Early Childhood Education/Child Care (ECE), Schools, School Gardens, Adult Ed/Job Training, Other (specify)
- **WORK:** Worksites, Transportation (pedestrian, cycling, transit), Other (specify)
- **LIVE:** Community Youth Organizations, Emergency Food, Housing, Faith, Health Care, Local Government, Indian Tribal Organizations, Extension/Local Health Departments, Other USDA Programs, Other (specify)
- **PLAY:** Parks and Recreation, Other sport and recreational sites, Community Gardens, Other (specify)
- **SHOP:** Large Food Stores, Small Food Stores, Farmers' Markets, Other (specify)

In the instructions, the specific types of organizations in each category would be designated. For example, Adult Education/Job Training would include TANF, Veterans, and other adult education sites in the community. ECE would include child care centers, Head Start, and day care. Since the categories of channels/sites all serve similar segments and lend themselves to direct education, social marketing and PSE interventions, the added workload of reporting sites is not warranted.

It is recommended that for reporting in Direct Education, the channels/systems/sites be defined as where the education takes place. For Social Marketing and PSE, it is recommended that the categories be defined as channels or systems through which interventions are being delivered or where the adoption of PSE changes are being sought.

**(6) Direct Education Programming Format, Instructions and Table 6 (p 7)**

It is not clear that the 'programming format' data now reported for SNAP-Ed are being used or what policy purposes are served by continuing to collect them. It is recommended that these categories be dropped in order to streamline the system and reduce the reporting burden.

**(a) Direct Education through Social Marketing and (b) Direct Education to Support Policy, Systems, and Environmental Changes**

It is recommended that the new field that separates which sessions of direct education are part of social marketing and/or PSEs not be included in EARS.

All SNAP-Ed activities should be aimed at achieving the state's SMART objectives and work together to drive long-term, large-scale, and permanent healthy change. All Direct Education should be aimed at achieving statewide objectives. Second, education is fundamental to both successful PSE interventions and to social marketing (in the commercial marketing mix, 'personal sales' is the term used for education where a salesperson provides individual customers with the information or skills they need). While some SNAP-Ed partners need assistance in introducing social marketing approaches and PSE content into traditional education, ultimately the social marketing and PSE content is integrated and thus not practical to separate.

**(7) SOCIAL MARKETING INITIATIVES (p 8-10)**

**Table: Description of All Social Marketing Campaigns**

*Directions (p 8-9)*

It is recommended that a more robust definition of social marketing in alignment with the public health practice and the Guidance (p 16-17) be adopted. In addition to the attributes now stated, commercial marketing techniques that

distinguish social marketing include advertising, public relations, promotion, and multiple forms of mass communications, including social media which is used consistently and at multiple levels (local, regional, state, national) and in as many different delivery channels as possible that reach the defined market segments in ways to influence behavioral choices. Typically a campaign approach where all possible partners and methods are synchronized to build toward measurable population change.

It is appropriate to use the categories A-D, namely the branded title of the campaign or initiative, how many years it has been in place, the major activities, and initiatives or promotions conducted during the reporting year. Ultimately, EARS should show how many SIAs and how many states conduct organized social marketing campaigns.

**Column E. Estimated Number of SNAP Recipients Reached**

It is recommended that, if this category is retained in EARS, it be clearly stated that counts are estimations based on city, county or statewide SNAP rates and that a standard method or protocol for making these estimates be developed. With the possible exception of campaigns targeting SNAP participants directly, large campaigns cannot get any better estimates of SNAP reach than projections based on county or statewide statistics, so it is important that the estimation methods be consistent among all SIAs.

**Column F. Low Income Persons Reached (Excluding SNAP Recipients) and G. Total Estimated Reach (Number of SNAP Recipients, Low Income Persons, and All Others)**

It is recommended that this category be defined as people with incomes  $\leq 185\%$  FPL and those  $>185\%$  FPL, and not attempt to subtract SNAP participants. Rather, report the reach as number of Low income people, Others with middle or higher incomes, and Total. Of the Total, provide the number who were estimated to be SNAP participants in the past 12 months.

It is recommended that Column C be redefined as the Total Estimated Impressions, defined as the number of times a media message touches the members of the audience, as with repeated views of an ad or billboard.

**Column H. Source(s) of Data**

Choices of data should be further delineated in accord with commercial marketing sources. Sources could be aligned with those identified in the Interpretive Guide for the SNAP-Ed Evaluation Framework.

**Column I. Primary Intervention Levels**

It is recommended that this field be dropped. Based on well-established marketing science and on definition, social marketing aims for all five spheres of influence in the Social Ecological Model.

**Column J. Primary Intervention Channels**

It is recommended that the codes for this field be changed into channels, identical to those recommended in Direct Education, Item 5. These are:

- **EAT:** Restaurants, Senior Centers/Congregate Meals, Other (specify)
- **LEARN:** Early Childhood Education/Child Care (ECE), Schools, School Gardens, Adult Ed/Job Training, Other (specify)
- **WORK:** Worksites, Transportation (pedestrian, cycling, transit), Other (specify)
- **LIVE:** Community Youth Organizations, Emergency Food, Housing, Faith, Health Care, Local Government, Indian Tribal Organizations, Extension/Local Health Departments, Other USDA Programs, Other (specify)
- **PLAY:** Parks and Recreation, Other sport and recreational sites, Community Gardens, Other (specify)
- **SHOP:** Large Food Stores, Small Food Stores, Farmers' Markets, Other (specify)

This itemization will allow summary statistics showing the organizational systems that are participating in large-scale change and also allow projections of Reach, as identified above.

It is recommended that the existing list of materials and approaches be dropped. In the present reporting system those data have no clear policy purpose, and the workload to compile the costs should be directed into meaningful information.

**Columns K. Total Expenditures for Social Marketing Campaign for Reporting year and L. Total Federal SNAP-Ed Expenditure for Reporting Year**

It is recommended that Column K be dropped, as state and local cost share is no longer required, and this field has no clear definition or policy purpose.

It is recommended that Column L be re-defined as the Total Federal Expenditures for Paid Mass Communications, defined as television, radio, outdoor, transit and other paid media. These are the only unique and easily separable costs incurred for as part of organized social marketing campaigns.

**(8) POLICY, SYSTEMS, AND ENVIRONMENTAL CHANGE (PSE) INTERVENTIONS (p 11—12)**

**(a) Number of PSEs that were adopted and (b) Table: Type of PSEs and Reach**

As with social marketing, it is recommended that this category of activity focus on channels in which PSE changes are being sought and where partners have agreed to work with SNAP-Ed toward evidence-based changes. It is recommended that the same categories recommended for Direct Education, Item 5, and social marketing be used. These are:

- **EAT:** Restaurants, Senior Centers/Congregate Meals, Other (specify)
- **LEARN:** Early Childhood Education/Child Care (ECE), Schools, School Gardens, Adult Ed/Job Training, Other (specify)
- **WORK:** Worksites, Transportation (pedestrian, cycling, transit), Other (specify)
- **LIVE:** Community Youth Organizations, Emergency Food, Housing, Faith, Health Care, Local Government, Indian Tribal Organizations, Extension/Local Health Departments, Other USDA Programs, Other (specify)
- **PLAY:** Parks and Recreation, Other sport and recreational sites, Community Gardens, Other (specify)
- **SHOP:** Large Food Stores, Small Food Stores, Farmers' Markets, Other (specify)

It is recommended that no attempt be made in EARS at this time to count policy, systems or environmental change. Rather, take the time to develop an approach consistent with metrics as they are finalized in the SNAP-Ed Evaluation Framework.

This itemization will, however, allow the compilation of very useful descriptive statistics showing the organizational systems that are participating in large-scale change and also allow projections of *Reach* and *Adoption*, as identified above.

**(i) Explanation of Reach Calculations and Any Assumptions Made**

It is recommended that estimations using the definitions of Reach and Adoption described in 1d, above, be used.

**(9) PARTNERSHIPS (p 13-14)**

**Instructions for number of partners, type of assistance received and provided, cash expenditures (p 13)**

**Partner Title**

It is recommended that this category or organizations be aligned as much as possible with the set of channels that is used in Direct Education, Social Marketing and PSEs, above.

**Column B. Assistance Received If Applicable and C. Assistance Provided**

It is recommended that 'assistance' be defined as activities high on the 'ladder of collaboration' and leading to the conditions for success in Collective Impact, namely mobilizing effort around a common agenda, maintaining ongoing communications, jointly coordinating efforts, sharing and reporting shared metrics, and providing 'backbone' support.

**Column D. Total Contribution Reported (if applicable)**

It is recommended that, while leveraging information can be useful, a standardized method of reporting such contributions is needed. Standardized approaches may be available in metrics being developed for the SNAP-Ed Evaluation Framework.

**(10) INTERVENTION TOPICS (p 15)**

**A-V List of Topics**

It is recommended that this listing be narrowed to (a) national priorities for achieving the *Dietary Guidelines for Americans* in order to focus all available resources on narrowing gaps and reversing negative trends. It is recommended that priorities be placed on those topics where EARS data indicate that most SNAP-Ed effort is currently expended: Fruits and vegetables, healthy beverages including milk and unsweetened beverages, physical

activity and recreational screen time and to (b) systems changes that align with food security, healthy eating, physical activity, and obesity prevention set of channels that is used in Direct Education, Social Marketing and PSEs, above.

SBF: EARS Comments, Table 10-16-15