

From: [Carlson, Mary](#)
To: [SNAP-Ed - FNS](#)
Cc: [Kelley, Suzanne](#); [Duda, Pat](#)
Subject: Comments on Proposed EARS Revision
Date: Monday, October 05, 2015 12:02:07 PM
Attachments: [VT CommentsOnProposedEARSformRevision 10-5-15.pdf](#)

Attached please find a letter with a few questions/recommendations from Vermont SNAP-Ed regarding the proposed revision to the EARS reporting form. Thanks in advance for considering these comments.

Mary Carlson

PLEASE NOTE RECENT CHANGES TO MAIL STREET ADDRESS AND EMAIL ADDRESS:

Mary Carlson, Food & Nutrition Program Coordinator

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AGENCY OF HUMAN SERVICES

Department for Children and Families
Economic Services Division
280 State Drive
Waterbury, VT 05671-1201

October 5, 2015

Jane Duffield, Chief, State Administration Branch
Program Accountability and Administration Division
Supplemental Nutrition Assistance Program
USDA Food and Nutrition Service
3101 Park Center Drive, Room 818
Alexandria, VA 22302

RE: Proposed SNAP-Ed EARS Report Form Revision
Federal Register Notice dated August 17, 2015

Dear Ms. Duffield:

As Vermont's SNAP-Ed plan manager, I appreciated the invitation to comment on the proposed revisions to the Education and Administrative Reporting System (EARS) form.

Items 1a-1e: Number of SNAP-Ed eligibles within your State

This pertains to the request for comments on ways to enhance the utility of information collected and use appropriate technology to minimize data collection burden. There is no consistent data source or methodology for states to estimate the number of residents who are income-eligible for federal nutrition programs. For those of us who have spent decades promoting participation in SNAP and school meals programs, it would have been easier to target those efforts if we had annual USDA estimates of the number of residents and children with incomes at or below 130% and 185% FPL in each state instead of manipulating limited available data to come up with our own estimates. EARS would generate more consistent statistics if FNS were the source of the 185% FPL estimate in question 1a.

Item 6a: Direct Education through Social Marketing

The item instructions need to clarify what "part of" a social marketing initiative means. It would help to have examples of an activity that is and is not part of the social marketing.

Item 9: Partnerships

The intent of table Column D is unclear. The instructions say to enter the "total cash expenditure," yet the column is headed "total contribution reported." Is it correct to assume that no federal SNAP-Ed funds would be included, that it would only reflect other cash expenditures reported by SNAP-Ed state agency partners to enhance SNAP-Ed programming?

Thank you for considering these comments. Please contact me at mary.carlson@vermont.gov if you have questions or need further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary Carlson", with a long, sweeping horizontal line extending to the right.

Mary Carlson
Food & Nutrition Program Coordinator