



Food and
Nutrition
Service

Park Office
Center

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Center Drive
Alexandria
VA 22302

Ms Susan B. Foerster, MPH
Director, Network for a Healthy California (Ret)
5937 Sarah Court
Carmichael, California 95608

Dear Ms. Foerester,

Thank you for submitting comments to the Federal Register listing FNS-0584-0594, Agency Information Collection Activities; Proposals, Submissions, and Approvals: Food Program and Reporting System, Worksheet FNS-759 Education and Administrative Reporting System (EARS) as a private citizen. This is a response from the Food and Nutrition Service (FNS) to your comments regarding burden hours and cost. All other relevant comments are addressed in the Supporting Statement for this Information Collection Request. The Supporting Statement will be publicly available upon approval by the Office of Management and Budget.

Your comment: A reporting system useful to funders, practitioners, partners and research is essential, as is upgrading of the outdated EARS system in accord with existing priorities, increased scope, and capped funding afforded through the 2010 Healthy Hunger-Free Kids Act.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.

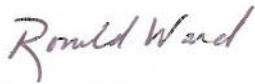
FNS Response: The purpose of the EARS is to collect uniform and standard information on nutrition education and obesity prevention activities funded through the Supplemental Nutrition Assistance Program-Education (SNAP-Ed) program. FNS has revised the form to streamline the data collection process by consolidating questions, providing clear instructions and adding examples to make the reporting process easier to understand and implement.

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FNS also plans to provide extensive training to the Regions, States and implementing agencies on the reporting process and the use of this form. Keeping the complexity of the reporting as suggested, FNS has already increased the burden hours from 2,808 hours to the current 3,180 hours.

Thank you again for your submission.

Sincerely,

A handwritten signature in dark ink, reading "Ronald Ward". The signature is written in a cursive style with a large, stylized "R" and "W".

Ronald Ward
Director
Program Accountability and Administration Division