



Food and
Nutrition
Service

Park Office
Center

3101 Park
Center Drive
Alexandria
VA 22302

Ms. Marci Scott, PhD, RDN
Michigan Fitness Foundation
Vice President of Health Programs
PO Box 27187
Lansing, MI 48909

Dear Ms. Scott:

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) on behalf of the Association of SNAP-Ed Nutrition Networks and other Implementing Agencies (ASNNA). 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: "As written, this draft of the EARS form represents a demographic reporting tool but presents challenges to collecting data that will be consistent and valid across states. As such, the data cannot be looked at in aggregate with confidence, and it is not really possible to look at comparisons or trends across regions or states. The tool is not set up to present outcomes with the exception of necessary denominators for PSE evaluation elements in the REAIM and SNAP-Ed PSE Evaluation framework. The amount of time needed for a State Agency (SA) or Implementing Agency (IA) to complete or enter the proposed EARS form varies greatly depending on the number of IA's and/or subcontractors in the state. Additionally, factors such as the support the SA has from the Regional FNS office and the types of and frequency of training and communication that the SA provides to its IAs would also have strong implications as to the time invested in compiling the requested information. Furthermore, if IAs throughout the Country vary or are inconsistent in how they are capturing and reporting this information, this calls into question if the information is valid and accurate. ASSNA has a particular concern about the introduction of error during this step in the reporting process. SA staff who often have limited knowledge of SNAP-Ed programming are generally responsible for data entry.

Ms. Marci Scott

Page 2

Thus the inevitable problem solving necessary to compile and tie-out statewide data into one number for form submission likely introduces significant error if completed without technical assistance. An additional post-submission review process could enhance data accuracy."

FNS Response The purpose of the Education and Administrative Reporting System (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. EARS is not designed to collect outcomes or impact data. FNS has revised the form to streamline the data collection process by consolidating questions, providing clear instructions and adding examples to help make the reporting process easier to understand and implement. FNS also plans to provide extensive training to the Regions, States and Implementing Agencies on the reporting process and the use of this form. With the complexity of this process in mind, FNS has 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'.

Ronald Ward

Director

Program Accountability and Administration Division