

# EARS TRAINING JANUARY – APRIL 2008 QUESTIONS AND ANSWERS

## DIRECT EDUCATION QUESTIONS

### **1. What are acceptable methods for gathering demographic data in community settings?**

Acceptable methods for collecting demographic data depend on the type of education approach you are using and how you plan to report it to FNS. If you are providing direct education and plan to submit unduplicated counts, the demographic data must be collected from the program participant. This can be done, for example, by asking demographic questions on a program intake sheet or on a program feedback or assessment form.

If you are providing FSNE via social marketing approaches, you may estimate the number of FSP recipients reached by FSNE versus other low-income persons, by using a variety of methods. The method used should be appropriate to the educational method used. For example, marketing or other data from radio stations for PSAs or census track, data to estimate the number of low-income persons your campaign will reach at events conducted in low-income communities.

### **2. Do the people represented in 1b need to relate directly to the same people represented in 1a?**

Yes.

### **3. Can you provide additional clarification on “length of session.” Do we need to record the exact minutes of each session or should we report an average or a range?**

You do not need to track the actual time of each education sessions. Just report the range of time for the length of the lessons in the series. For example if you offer 80 series with 2-4 sessions, with sessions for one series being 30 minutes and in another series, the session were 60 minutes. You would put 80 in column A and 30-60 in column B. If any of these were delivered by multimedia, indicate the percentage in column C.

### **4. Talk about guidelines for estimating unduplicated counts of participants and provide examples.**

At this time, there are no guidelines for estimating unduplicated counts of participants. We encourage all States to formulate methods for collecting and reporting actual counts of direct education participants and contacts. Estimates may be used while States make adjustments to data collection systems to allow the collection and reporting of actual unduplicated counts.

### **5. Would direct education sessions where no demographic information is collected be reported in table 8b Estimated Size of Audiences Reached through Communication and Events under “other”?**

If reporting actual counts under participants for 1a and there is missing demographic data for a set number of people, these numbers can be pulled out from all direct education questions and reported under 8b “other”. If the agency chooses to report estimated counts of participants and the missing

demographic data can be reasonably estimated then report all numbers under 1a and include an explanation as to how the estimation was derived.

**6. What is the definition of “duplicated count”? Is it just the same participant within the same program?**

Duplicated count means counting the same individual more than once as a Direct Education participant. Implementing Agencies should strive to ensure that counts of participants are unduplicated within their agency. However, FNS does not expect rolls of direct education recipients to be shared across implementing agencies.

**7. Further clarification is needed on “unduplicated” counts. If a program provides FSNE to children in a school and also to children and their parents in a housing project right next door to the school must the counts be unduplicated?**

Yes. If the same Implementing Agency is conducting both FSNE projects then the expectation is that participants will not be duplicated. See question 6 for further explanation.

**8. Our FSNE program targets potentially eligible FSP recipients and we are concerned that with the current EARS form one cannot distinguish the number of FSP eligibles that receive FSNE as they are included as part of the “other” category which includes potential “non-eligibles” as well.**

The FSP eligible population that receives FSNE direct education is counted under the “other” category however this doesn’t pose significant issues if the FSNE program is targeting their nutrition education services based on the provisions in the FSNE guidance. The number of non low-income individuals should be a small number and negligible when analyzing the data. The majority of recipients in the “other” category should be the FSP eligible population.

**9. When a planned series of FSNE classes overlaps two fiscal years how do you count the participants and contacts?**

Complete the EARS form based on one fiscal years data. If a series of classes overlaps two fiscal years, count the participants and contacts at the end of one fiscal year on the EARS report that corresponds accordingly. When the new fiscal year begins, record keeping starts over and you would recount attendees in the overlapping series as participants and begin tracking the number of contacts that occur in the current FY.

**10. When providing FSNE to Head Start children is the USDA free lunch data available or collected at daycare facilities for this population?**

That information should be available from the daycare if they are serving low-income children.

**11. Are duplicated count and contacts the same thing?**

They refer to a similar situation; however the language is not interchangeable. Tracking the number of FSNE contacts with the same individual prevents the individual from being counted more than once (or duplicated) for the same activity under 1a FSNE Participants. For example, if you have multiple sessions with the same FSNE participant you prevent a duplicated count from occurring by counting the initial session as one FSNE Participant Count under 1a and then all contacts combined (including the initial session) under 1b on the EARS form.

**12. We have more than one implementing agency and it is possible in the larger urban areas that the same person might attend FSNE sessions conducted by different implementing agencies. Are we expected to prevent duplicated count in this situation and if so, how does HQ suggest we do this?**

Implementing Agencies (IA) should plan to prevent duplication by not overlapping audiences. However if this does occur we expect there to be unduplicated counts by IA. We expect the occurrence of overlapping audiences to be rather small if good program planning is utilized.

**13. How do you determine which four learning codes are the most significant when each subcontractor is submitting different combinations?**

Implementing agencies should be planning their nutrition education programs to emphasize a certain set of learning codes and this is communicated down to the subcontractors. The subcontractors do not dictate to the IA's which codes are most emphasized in the FSNE program as the preplanned curriculums that are used with FSNE program are determined when submitting the FSNE plan for approval.

**14. How do you count 18-year-old FSNE participants who are receiving FSNE in schools (column B or C)?**

The age categories indicated in the column headings for the EARS form take precedent over the particular setting or location of the FSNE activity. In this case the 18-year-old would be counted under column C, 18-59 years old.

**15. If the number of contacts in a school classroom is based on average classroom size (e.g. students) instead of counting actual attendees in each class, would this be reported as estimated data or actual under 1b?**

This would be an estimated count.

**16. If Mrs. Jones is part of an indirect supermarket demonstration but you don't have her name, how do you know if she is getting "counted" or duplicated in both direct and indirect education?**

If Mrs. Jones is attending two distinct education activities that are not part of the same planned direct education series that was mentioned in the example then you would count her once under direct education (1 participant—4 contacts) and again under indirect education. We do not want duplication under direct education but if Mrs. Jones receives additional Nut. Ed. from indirect education efforts you can count her again.

**17. Do you need a client's name or can you use initials with a birthday to identify participants?**

You can choose to use whatever method works for your program to uniquely identify clients.

**18. Our school's Department of Education provides combined free and reduced price lunch participation data. We cannot tease out how many children are receiving free versus reduced meals with the data we receive. We do know that "others" or eligibles are a greater number than those who would be categorized as "recipients". To separate out recipients from eligibles or "others" we would need to go to each individual school. This is very time consuming. Isn't this overkill?**

This data is available disaggregated. You can contact your Department Of Education (DOE) and ask for a more detailed report. Your FNS Regional office can help you with this if you find resistance from the DOE.

**19. If children are estimated by free and reduced price meal data and our adult counts are actual data, how do we record this on the EARS form?**

By exception, the children that are estimated based on free and reduced price meal data can be counted as actual data. Thus, you would record both your children and adults as actual counts. Page 3 of the EARS form provides an example of “special circumstances”.

**20. If you are conducting a planned series of direct education interactions and you have participants at the beginning of the series that are not receiving food stamps but by the end of the series they are receiving benefits, how do you count this? Is their status determined at the beginning or the end of the series?**

If you know that some of your nutrition education participants changed status at some point during a series of classes and went from food stamp eligible to food stamp recipient status, you can adjust your data collection to reflect the change. You should attempt to report the most up to date information on your clients that is possible.

**21. For question 4, when you visit individual homes, do you count each individual home/household as a different site/location?**

Yes—you would count each different house as a different site or location.

**22. For the same households individually visited would each home count as a separate single session delivered under question 5 Column A, row 1?**

Yes.

**23. For EARS Question 6, how do you decide what is the “primary” content area?**

As the Implementing Agency (I.A.) you have discretion as to how you will determine this. It could be the topic taught to the largest number of people or for the largest amount of time. Whatever you chose, the decision should be made by the I.A based on your State FSNE plan.

**24. Do we count handouts targeted at children, including educational reinforcement items with targeted nutrition messages as direct contacts if they are described as part of the planned education in the annual FSNE proposal?**

When planning your FSNE program, handouts and reinforcement items are part of a curriculum or planned series of education interactions with the client. They support the nutrition education elements that were taught during the designed interaction but are not by themselves counted as separate interactions under direct education.

**25. In the example of an education session that included these elements:**

- lesson - presentation of nutrition topic content by an educator 15 min
- DVD - reinforcement of content presented by the educator 10 min
- food tasting - 15 min
- work sheet completed in the session - 20 min
- take home exercise to be completed and returned at the next session (lesson 2 of a series of 6 lessons) - 60 min

**How many contacts are in this session of 60 min in the face to face session plus 60 min in the take home exercise? What would be considered direct or indirect education contacts from this session?**

In order for a nutrition education to qualify as direct education, the planned series of events must be interactive with the client and include the collection of specific demographic data. If both of these conditions are met the event would be counted as Direct Education. In this specific example, each individual attending the series would be counted as one unduplicated participant for question 1a on the EARS form. For EARS question 1b, count each session they attend including the initial session as one contact. If the completed series is six sessions and the participant attends all six this would count as six contacts. It is not relevant how each session is broken down (taste testing, DVD, worksheet etc.). If all those activities occur in one session, then that session is counted as one contact. If the 60 minute take home exercise is interactive and part of the planned series then this would count as an additional contact as long as the participant completed the exercise.

**26. Is it correct that line 1 is equal to Category 1 eligibility as explained in the 2008 Guidance, pg 9?**

No, for both EARS questions 1a and 1b-- row 1 you are counting the number of FSNE recipients who are receiving Food Stamp (FS) benefits.. These are individuals that self-report (actual data) that they are receiving benefits, are determined by using free lunch data or are estimated by some legitimate method as receiving FS benefits. Category 1 individuals in the FSNE Guidance include more than just individuals receiving FS benefits. It also includes individuals who are applying for FS benefits who may or may not end up receiving them. These individuals should be counted in row 2 on the EARS form (All Other FSNE recipients) until which time they report or are determined as receiving benefits. If a person's food stamp status changes while receiving nutrition education, these individuals should be reclassified under row 1.

**27. Is it correct that line 2 is equal to Category 2 likely eligible by proxy + Category 3 likely eligible by location + any other participants.**

Yes—Category 2 individuals are likely eligible for food stamp benefits but not necessarily receiving them. Therefore category 2 persons should be counted on row 2 for EARS questions 1a and 1b, which includes all other persons who are receiving FSNE services but not FS benefits.

**28. Is it correct that line 2 would include individuals up to 185% of poverty + any other participants who might be in the education session and could not be reasonably excluded (for example students in a school with 75% f/r price lunch)**

Line 2 includes anyone and everyone who is receiving FSNE services but not receiving food stamp benefits. However, in the case of schoolchildren, those who receive free lunches are by proxy considered Food Stamp Program recipients and those individuals are counted under Row 1 for each question.

## **RACE/ETHNICITY AND GENDER QUESTIONS**

### **29. Can participants be included in the unduplicated count if race and ethnicity is unreported or refused?**

If the “actual” method is used to report data for Question 3, persons that do not provide race and ethnicity cannot be counted (under questions 1, 2, or 3). If the “estimated” reporting method is used for question 3, you may include persons that do not report or refuse to provide race and ethnicity, **but** you must provide an explanation as to how the estimate was derived.

### **30. How should you report situations where race and ethnicity have been collected on the majority of direct education participants but at the end of the year, they still have a small minority of unknown or unreported? For example, they have actual race and ethnicity data on 90% of their participants but 10% are unreported or unknown.**

If reporting actual counts under participants and contacts for 1a and 1b and there is missing demographic data for a set number of people, these numbers should be pulled out from all direct education questions (EARS questions 1,2,3) and reported under 8b “other”. If the “estimated” reporting method is used for question 3, you may include persons that do not report or refuse to provide race and ethnicity, **but** you must provide an explanation as to how the estimate was derived.

### **31. What methods do you recommend for collecting race and ethnic data in large group settings (where “visual assessment” is not appropriate)?**

For reporting of direct education and unduplicated counts, it is always preferable to allow adult program participants to self report- race/ ethnicity, gender, program participation, etc. whether it is in small or large group settings. This can be done, for example, by asking the questions on a program intake sheet or on a program feedback or assessment form.

If necessary, OMB allows a “visual assessment” for race and ethnicity in individual or small group settings, however direct collection from participants is preferred.

### **32. Can estimates for gender be used in large group community settings?**

To report actual unduplicated counts, gender must be collected from the direct education recipients and the methods used in large group settings are the same as would be acceptable in other settings. This can be done, for example, by asking the questions on a program intake sheet, sign in sheet or on a program feedback form. If estimates are reported on the EARS form, an explanation must be provided as to how the estimate was derived.

### **33. What is the best source for obtaining race and ethnicity data from schools?**

The school should be asked to provide aggregate race and ethnicity data for the classrooms that have FSNE activities. When classroom data is not available, data by school may be used.

### **34. We would like to use a proxy method to estimate race/ethnicity, gender age, FSP participation, and low income for direct education for the sites where direct education will be delivered, The Network or a contractor would obtain for each specific site/venue existing data about race/ethnicity, gender, age, FSP participation or FPL that is required by EARS.**

- school sites have school specific data with % of each

- *community health centers have own data by %*
- *food banks have own data by %*
- *retail – census tract*
- *health fairs/festivals – census tracts or consumer survey*
- *senior centers – census tract or client information*

*Alternatively, would it be acceptable to gather direct education data on only a sample of class participants from a given contractor, e.g. 10%?*

No, the instructions on the EARS form must be followed, as this is the form approved by OMB.

**35. Most schools do not have the race/ethnic/gender information in the format that EARS requests. For example, most schools still treat “Hispanic” as a race not an ethnicity. This creates a quandary when trying to use school enrollment data for the purposes of EARS. Is there a process that will help us correct this and help our personnel correctly report this information?**

Collection of race and ethnic data as depicted on the EARS form parallels what is mandated by OMB and the census bureau. All federal agencies (including the Department of Education) should be collecting or in the process of moving towards collecting this information based on this guidance. FNS has no recommendations for rectifying the situation of other federal agencies not following this mandate. If actual information is not available then the estimated method for race/ethnicity and gender must be used.

### **INDIRECT EDUCATION AND SOCIAL MARKETING QUESTIONS**

**36. For clarification, could you help us determine if and how to report the following scenarios in the indirect education section of EARS (8a and 8b).**

***Scenario 1: Contractors hand out fact sheets, pamphlets, newsletters, promotional materials, nutrition education articles, etc. to participants who attend their direct education classes. These pamphlets go home with participants and are shared with family members and friends. We have been referring to this sort of scenario as reinforcing activities. Would this be counted as indirection education under section 8a in EARS (Types of Materials Distributed)? Or should we only count mass communications? Do we need to estimate the number of target population reached (including family and friends) under section 8b of EARS (Estimated Size of Audiences Reached through Communication and Events)?***

Scenario 1 would not be reported under indirect education because, as the scenario states, it is a direct education activity. In addition, only the actual participant in the education session would be counted under direct education and not the family members and friends.

***Scenario 2: Contractors write a nutrition education newsletter, calendar, or poster and send to the whole community or tribe. Would this be considered indirection education in EARS? Would we need to count the estimated number of target population reached under section 8b of EARS?***

Yes, if Scenario 2 was not part of a Social Marketing effort, it would be considered indirect education and the estimated number of the target population reached would be reported in Question 8.

**Scenario 3: Contractor writes a nutrition education article in a newspaper or community newsletter. Would this be considered indirect education in EARS? Would we need to count the estimated number of target population reached under section 8b of EARS?**

Yes, if Scenario 3 was not part of a Social Marketing effort, it would be considered indirect education and the estimated number of the target population reached would be reported in Question 8.

**Scenario 4: Contractors leave nutrition education pamphlets, newsletters, promotional materials, articles, etc. in lobby for WIC participants or people at food banks to pick up. Would this be a reinforcing activity or considered indirect education in EARS? Would we need to count the estimated number of target population who received the information under section 8b EARS.**

Scenario 4 would be considered indirect education and an estimate of the number of people who received the information would be reported on the EARS form under section 8b.

**37. In Question 8 on the EARS form, does “nutrition education articles” refer to articles written in more mass communication mediums like newspapers and community newsletters (not class fliers or handouts in a lobby)?**

They refer to both articles written in mass communication mediums and newsletters.

**38. Under the Indirect Education section, please explain what the difference is between “Community Events/Fairs—in which participated” vs. “community events/Fairs-only sponsored”?**

*Community Events/Fairs in which participated* is an event where you are an exhibitor or that you have a booth or station but that your organization did not plan or put together the event

*Community events/fairs in which you sponsor* are those that your organization planned and put together and you likely to have a larger presence with more contacts and greater influence as to what type of education is planned for participants.

**39. Under Indirect education 8B, are we counting the number of individuals reached or the pieces of materials distributed as the number used to estimate size or reach of the activity? For example if we send out a monthly newsletter to the same 50 people each month do we count the reach as 50 people or 50 x 12?**

Question 8b asks for an estimate of the size of the audience reached so the answer to your question would be 50. We expect the use of the most accurate method possible for tracking indirect education activities, however it is realized that in some situations you may need to estimate the reach based on the number of materials distributed as oppose to the number of people specifically reached. If it is impossible to determine the reach of a newsletter or article simply check off the method under 8a and do not attempt to count under 8b.

**40. Do mass marketing events have to be for low-income audiences?**

Yes. All food stamp nutrition education activities must be targeted towards low-income audiences. Please see the FSNE Guidance for more information on target audience.

**41. Is 8b “other” where all those people go who did not provide all the information needed to be counted as direct education, or do they go under community event sponsored?**

Yes, you can put those individuals under direct education in 8b “other”.

**42. How do you categorize a newsletter that targets parents of children who received school-based FSNE nutrition education in which you have complete demographic information and will count under direct education?**

You would count parents who receive newsletters as a different and distinct audience from their children who receive FSNE in schools. The children would count as direct education and the parents would be counted under indirect education.

**43. When you subtract out incomplete data from rows 1a and 2a, in what row on 8b do you put them?**

“Other”

**44. Should any detail be provided when using the “other” rows for 8a and/or 8b?**

No.

**45. We do paid ad placement in our social marketing. Do we use code “B=Nutrition Education TV Public Service Announcement (PSA)” under intervention channels on page 12 of the EARS form or report this under “O=Other”?**

Use code “B”.

**46. Where do you put a series of interviews on the radio?**

If they are not part of a social marketing campaign, they are recorded under 8B “other”.

## **FINANCIAL AND REPORTING QUESTIONS**

**47. What financial support, technical expertise and technical support is available to the states to help them in implementation of their own data collection systems?**

FNS will be collecting information on what data collection systems exist and will be posting this information on the Nutrition Connection web site.

**48. What types of reports will you be sharing with us that EARS can generate? In what format will they be shared (spreadsheets, tables, graphs, text)?**

We will be able to generate reports on any of the variables captured in the EARS data. A short list of examples includes:

- Social marketing expenditures by priority population (target audience)
- Average cost per channel used
- Number or percentage of social marketing campaigns promoting a key message by fiscal year
- Relationship between total FSNE expenditures and administrative costs

The National Data Bank generates reports as spreadsheets (Excel format). Some canned reports will also be available that may include charts and/or graphs. Since the reporting output files are Excel, one could conceivably generate an endless variety of charts and graphs from EARS data. Reports other than system-generated canned reports will likely be in spreadsheet form.

**49. Can you show us dummy tables EARS would produce for FSNE programs to use at each of these levels (local, state and Federal)?**

Federal, State, and local level reports will be the same. The only difference is that State-level reports will contain aggregated data that includes all the State's implementing agencies. Similarly, Federal-level reports will contain aggregated data that includes FSNE activities in all States. Regional-level reports will also be available.

**50. We propose to list administrative personnel positions and obvious administrative sub-contractors, such as auditors, as the only expenses under Administration. We feel this is sufficient. Do you agree? If not, please explain.**

No, this is not an acceptable approach for reporting administrative expenses on the EARS form. This approach would cause a State to "under report" their administrative expenses. FNS recommend that State FSP Agencies and Implementing partners follow the instructions when reporting this information. The form allows the respondent to report this information as actual or estimated (based on FTE allocation).

**51. The costs of administering EARS are initially going to be high. Should we not be documenting them separately?**

No, States should report expenses associated with EARS as they would report any other FSNE expense.

**52. Local agencies have (and need) 60 days to close grants. The mid November deadline date is not realistic for final financial data. Could the date be changed to January so revisions to the submitted date will not be necessary?**

EARS data should be submitted by December of each year which is 90 days after the close of the fiscal year so this should allow enough time for most agencies to submit final data. If revisions are needed however, they can be made. This is the same process and procedure for all State submitted data.

**53. Given that it takes 3 years to close out a budget, for question 9, how does USDA plan to reconcile the actual figures submitted at the close of a given fiscal year in December so that they align with the fiscal year in which the expenses were actually made?**

EARS financial data must correspond to date reported on the FNS 269. If alterations are made to the 269, then the EARS form must be updated as well.

**54. The description of administrative costs on P. 10 of the EARS form is very different from how administrative costs are directed in the FSNE Guidance. Which takes precedent?**

Instructions provided on the EARS form should be followed when determining administrative costs.

**55. The EARS definition for expenditures counted as Nutrition Education Program Delivery costs includes "Cost of any FSNE evaluation efforts". Would time spent by state level staff who design and manage statewide evaluation activities fall under this definition? Or is this**

***definition intended to cover only field staff who actually administer evaluation tools to the FSNE audience?***

The cost of any FSNE evaluation activity should be counted as a program delivery expense. However, these expenditures should be reasonable and necessary expenses applied towards the completion of the evaluation effort.

***56. Where do you count a State employed teachers salary that is used for Federal match purposes on the EARS form?***

You would count this as State tax revenue and would place this amount under line 1 on Question 9 of the EARS form.

***57. For question 9, where do you count teacher's time?***

Under public cash.

***58. Administrative costs listed on page 10 of the EARS form are very different from how administrative costs are described in the Guidance. Which one do we use?***

The administrative costs listed on page 10 of the EARS form is not an exhaustive list of examples. If there is discrepancy between EARS and the Guidance then adhere to the instructions and examples provided on the EARS form.

## **FSNE GUIDANCE , SYSTEM & OTHER GENERAL QUESTIONS**

***59. Clarify the reporting responsibilities of implementing agencies versus State Agencies. (also see Roles and Responsibilities on line.)***

Both the State Food Stamp Agency and its FSNE implementing partners play critical roles in collecting and transmitting EARS. FSNE implementing agencies are responsible for:

- Providing training and technical assistance to local FSNE providers regarding the collection of EARS data.
- Reviewing and monitoring the collection of EARS data at the project level including making necessary adjustments in current collection systems to ensure that data is accurately collected and reported in a manner that is consistent with the EARS format.
- Collecting, compiling and accurately completing the EARS form and submitting it to the State FSP Agency in the format requested by the State Agency.

The State Food Stamp Agency is responsible for ensuring that accurate and complete information is collected by the implementing partners and for submitting the data to FNS by December 31st of each year beginning in 2008. This role involves:

- Providing data and informing them of the format to use in submitting it to the State Agency.
- Reviewing and training and technical assistance to FSNE implementing agencies regarding the collection of EARS monitoring FSNE implementing agencies' collection for EARS to ensure that data is accurately collected and reported.
- Entering and submitting EARS data for each implementing agency in the Food Program Reporting System (FPRS).

**60. Does USDA endorse development of states collaborating to develop a system for data collection from contractors?**

FNS does not endorse the development of any State data collection system. It is clearly a State's decision; however, we would encourage conversation with the FNS Regional office as other States have developed EARS systems that may be useful to you.

**61. If a state does not want to develop an online system for reporting EARS on its own, what are its alternatives?**

State FSP agencies and Implementing partners are not required to develop an online system to report data to FNS. State FSP agencies are expected to annually manually enter EARS data for each of their implementing agencies into the Food Program Reporting System (FPRS) to submit the data to FNS.

**62. How does the financial reporting for question 9 on EARS relate to what is reported on the SF-269? Should these two numbers match?**

First, it is important to understand the periods related to reporting data for SF-759 (EARS form number in FPRS) as well as the SF-269 form.

- Both the SF-759 and SF-269 data are due 90 days after the close out of the federal fiscal year, which is September 30th. This means that States must input data from both forms into the FPRS system by December 31 of each year.
- After the State inputs the data into FPRS the FNS regional offices have until January 22<sup>nd</sup> to review the data and accept it or ask the State for further clarification. This is true for all data submitted on the FPRS system.
- By February 1, all final data should be entered into the FPRS system by the State and accepted by the regions.

The information required on line E of the SF-269 is also to be reported on line 9, Question 9 of the SF-759. These numbers should match since the same data reported by the implementing agencies is used to calculate this figure.

If the nutrition education line item is adjusted on the SF-269 after December 31, then the data on the SF-759 form should also be adjusted so the numbers continue to match. A process is already in place within the FPRS guidelines for making revisions to the SF-269. Adjustments to the SF-759 component in FPRS will be handled in a similar manner.

**63. What will the Region be required to do with the information from the EARS submissions?**

The regional FNS offices are to make an assessment of the quality and or accuracy of the data received on the EARS form based on their knowledge of how the FSNE programs in their region operate as well as a series of checks and balances that are built into the online submission system.

**64. Is it allowable to offer FSNE to a specific classroom in a school that has less than 50% of children on free and reduced lunch, but 100% of those in the targeted classroom (such as a teen parents classroom) are participating in the free lunch program?**

No. The targeting mechanisms outlined in the FSNE guidance stipulate that the school must have at least 50% of its students on the F/RP lunch program in order to conduct FSNE programs at that location. It is not acceptable to target only a specific classroom.

**65. There is a need for the guidelines regarding how you develop your FSNE proposal to parallel the data categories in EARS. For example, the Guidance uses categories I, II, III to describe FSP status of participants, where as EARS only reports participants versus non-participants (others).**

The annual FSNE plan and EARS are two separate yet harmonious reporting functions. The FSNE plan provides structure on how to describe and detail your program's allowable activities, the target audience, and the methods for delivering your FSNE program. The EARS reporting system collects and analyzes the results of those FSNE activities that are described in the FSNE plan in a reportable format. The categories described in the Guidance are to help target FSNE recipients and eligibles and are based on locations where there is a high likelihood of finding eligible FSNE individuals. When consolidating your data to report on EARS we are asking for you to place all food stamp recipients in one category on the EARS form and all others who receive FSNE in the "other" category on the form, regardless of what category was used in the Guidance to target them in the first place.