

Food Stamp Nutrition Education National Conference Call
March 29, 2007
Questions and Answers

EARS

1. **MPRO Question:** The EARS Guidance indicates implementation dates on the form but it sounds like that is really a reporting date so implementation would be 15 months later. Clarify please.

Answer: The EARS Implementation Plan (Template 9; page 96) in the Guidance requests dates when the State agency will first submit the EARS data to FNS. Implementation of data collection must occur prior to the date for reporting. If a State agency indicates on Template 9 that their “target date for implementation” is December 2008, the State must implement data collection during FY 2008. For example, a State reporting “Unduplicated Counts of FSNE Participants by Gender” in December 2008, would need to start collecting this data at the start of FY 2008.

2. **MPRO Question:** What is the role of the State Office in testing the EARS online submission system? We would like to volunteer but our State Office does not know what this would involve on our part.

Answer: FNS invites the State FSP offices and FSNE implementing agencies to assist us in testing the online system for submitting EARS data to FNS. State agencies (SA) will submit real data obtained from implementing agencies. Therefore, the State agency and its FSNE implementing agencies (IA) must work together to complete this task. Implementing Agencies may submit data they have collected to the State Agency which, in turn, will review and approve the data. If there is more than one IA involved, the SA will consolidate data for the State EARS report before entering it into the EARS system. The State Agencies and their FSNE implementing agencies will provide feedback to FNS regarding their experiences in using the online system. The purpose of this test is to ensure that the EARS computer system is user-friendly, that instructions are clear, that navigation tools work, and that the system compiles and analyzes the data accurately.

3. **MPRO Question:** What specifically are the roles and responsibilities of the State Office and the Implementing Agencies with regard to EARS?

Answer: Both the State Agency and its FSNE Implementing Agencies play critical roles in regards to EARS. The State Food Stamp Agency is responsible for ensuring that accurate and complete information is collected and submitted for EARS by the established timeline. This role involves:

- Participating in Regional trainings on EARS;
- Providing training and technical assistance to FSNE implementing agencies regarding the collection of EARS data;
- Reviewing and monitoring FSNE implementing agencies’ collection for EARS to ensure that it is accurately collected and reported;

- Using the EARS data, if desired, to inform the annual FSNE State Plan process, generate reports for State partners and stakeholders, and generate awareness regarding FSNE services in the State.
- Submitting the EARS form using the online submission system.

FSNE Implementing Agencies are responsible for:

- Attending any State or Regional trainings on EARS.
 - Collecting, compiling and submitting accurate EARS data to the State Agency.
 - Providing training and technical assistance to local FSNE providers regarding the collection of EARS data;
 - Using EARS data to inform the planning and management process as appropriate;
 - Reviewing and monitoring the collection of EARS data at the project level to ensure that it is accurately collected and reported in the manner specified on the EARS form.
4. **WRO Question:** We, and probably most other States, are developing plans for data collection systems to meet EARS requirements. What is the likelihood that the EARS online program could be made available to States to use to create summaries within the State and avoid the costs of creating State data collection systems to meet EARS requirements?

Answer: FNS is exploring the possibility of sharing the application with State Agencies but it is likely that different hardware environments will make sharing the application difficult.

5. **WRO Question:** Is there a process for State IT staff to participate in the development of the online web application for EARS? This would be very helpful in terms of creating a national system that is compatible with existing State computer systems and could help States better prepare for what changes may be needed in their own systems. We would be happy to volunteer a representative from our IT staff if this is a possibility.

Answer: No, this is not in the scope of the contract and the system is already under development. In addition, it has been FNS's experience, that it is not possible to create a national system that is compatible with 50+ State systems. The online system will be an electronic version of the EARS paper form. States can use the paper version of the form to prepare for any changes they need to make in their current data collection systems.

Evaluation

6. **WRO Question:** Are there increased expectations that State and local projects will conduct evaluation, especially outcome or impact evaluation, which is new this year?

Answer: The FY08 Guidance changes regarding FSNE evaluation are intended to clarify the FNS position on and support for evaluation, generally. There have been numerous questions and some misunderstanding about what evaluation activities will be approved for 50 percent Federal reimbursement.

When a state FSNE partner commits substantial resources to an intervention evaluation (defined in the guidance as more than \$400,000), the Food and Nutrition Service highly recommends that an impact evaluation be a part of the overall evaluation activities. Note the Guidance makes a distinction between outcome and impact evaluations. Under these circumstances, the impact evaluation should reflect the research principles identified in the Agency's *Nutrition Education: Principles of Impact Evaluation*. This document can be found on the FNS web-site as indicated in the Guidance.

7. **WRO Question:** For evaluation projects that have control groups, it is difficult to identify one other than schools. Some contractors would like to go to schools that do not receive FSNE funding to do the comparison. Is this acceptable?

Answer: It depends. A control group involves random assignment of units in the target population to a no treatment condition. If the nutrition education intervention is focused on individual behavior change, the ideal unit of assignment is students within schools rather than the schools themselves. Students in the control group might be scheduled to receive FSNE at a later point in time.

As an alternative – for example, when it isn't possible to keep students in the control group from being exposed to the intervention – some impact evaluations make the random assignment at a more aggregate level, such as classes, schools, or districts. In this case, schools from the target population (i.e., those with a large proportion of low-income students) would be sorted into matched pairs and one school from each pair would be randomly assigned to the control condition. The associated statistical analysis would need to control for the effects of clustering students in their assignment to intervention and control groups.

8. **Question:** Will FNS approve reimbursement for the cost of evaluation control groups?

Answer: Yes, when the proposed control group is part of an impact evaluation that meets the standards described on p. 18 of the FY08 Annual Guidance, including the criteria specified in the Agency's *Nutrition Education: Principles of Impact Evaluation*.

Note, a control group is composed of units from the FSNE target population not exposed to the intervention and involves random assignment. To qualify as a reasonable and necessary cost, the sample size for treatment and control groups should be explained in terms of the standard conventions for determining sample size – e.g. degree of precision required, sampling method, etc.

9. **Question:** Clarify the instructions to describe objectives and measures on pp.33-34 of the FY08 Annual Guidance.

Answer: The instructions on p. 33 refer to the nutrition education intervention. They call for a description of the objectives associated with each project in terms of how they relate to the overall State FSNE objectives. Item "j" on the same page asks how project implementation and performance will be measured. An example of an implementation measure is the number of PSAs delivered in each media market during the intervention. One associated performance measure might be the percent of people in a media market who report hearing the message. Another performance measure may be the change in the percent of people over all media markets who report drinking low-fat milk.

The instructions on p. 34 refer to evaluation plans. They assume that there will be some level of process evaluation, in which project implementation is measured. The information on p. 33 (implementation measures) and p. 34 (process evaluation) will be the same.

The performance measures associated with any evaluation may or may not be the same as those described for the intervention. First, not every project will include a formative, outcome or impact evaluation. For those that do, p. 34 calls for a description of relevant measures which may or may not be the same performance measures described in response to instructions on p. 33. For example, assume there is a formative assessment to determine whether or not fourth graders can follow instructions to play a computer game that is designed to deliver nutrition messages. The evaluation measure of interest may be the proportion of children who are able to play the game without asking questions. This is not, however, a performance measure for the intervention itself.

The bottom line: For process measures, the information provided in response to instructions on pp. 33 and 34 will be the same. For implementation measures, the information provided in response to instructions on pp. 33 and 34 may or may not be the same.

10. **Question:** Under what circumstances is FNS requesting an impact evaluation?

Answer: Whenever a State carries out an evaluation activity that costs more than \$400,000 in total, FNS strongly recommends that an impact evaluation be conducted. This is regardless of whether the \$400,000 is spent in one or multiple years.

11. **Question:** Should the State FSNE Plan indicate which evaluations are expected to exceed \$400,000 in total?

Answer: Yes. When completing Template 2, indicate which evaluations will exceed \$400,000.

12. **NERO Question:** When do States complete Template 1, Section B?

Answer: Template 1, Section B asks for a description of the impact evaluation(s) that States conduct each time an evaluation's costs exceed \$400,000.

Financial Management

13. **NERO Question:** Per page 53 of the Guidance: "Cash donations to a local entity are simply revenue of that local entity and do not require a cash donation waiver". Would the local entity be the local department of social services that oversees the project and/or the nutrition project? Also, our interpretation is in this case the funds can revert to the donor. Is that correct?

Answer: A local entity in this case is other than the State agency and includes the local organization that is a subgrantee of the State charged with the oversight of the delivery of local FSNE projects as well as the entity that actually delivers the services. The important point here is that private cash donations to other than the State agency do not require a cash donation waiver and thus the four conditions need not be met. Even so, the four conditions are good business practices that should be considered for application at the option of the State to all donated funding. Private cash donations to the State do require a waiver, which attests to the fact that the four conditions are met. Please see the Guidance, page 53 for a list of those conditions.

MWRO Question: Could you please help with answering a quick question, critical to our FY 08 FSNE planning? In our State, we have several non-profit public hospitals. These institutions provide large partnering potential, especially for the work we do around breastfeeding. Can these hospitals be cost shared, i.e., staff time and benefits and/or supplies, in support of FSNE?"

Related Question: Given the Guidance focus on health promotion and primary prevention of chronic disease, it seems that many of our best partners (both for working with food stamp eligible people and for securing State match) are health organizations. There seems to be a lot of confusion, however, around their eligibility. Looking at the variety of health prevention organizations – health systems, workplace wellness programs, health organizations, to name just a few – could you provide us direction on their eligibility to be part of FSNE?

Answer: We have recently received a number of inquiries about the participation of health care facilities in the FSNEP. The allowability of this type of partnership hinges on whether the entity is public or private. The entity's profit or non-profit status is not relevant. We have determined that unless an absolute need is provided, (no other provider is available, etc) participation by non-governmental (private) health care organizations is not reasonable or necessary and should be discouraged. There are at least four major problem areas associated with using this organizational type as a subgrantee. These include:

- 1) A valid determination as to the organization's status as public (governmental) or private (non-governmental) is difficult to ascertain. Many public health care facilities are not governmental and this determination is vital since, we assume that some or all of their contribution will be in the form of in-kind contributions. Only government entities may use in-kind (non-cash) contributions to meet the State or local share of allowable costs.
- 2) Procurement regulations in some States or counties prevent awarding a contract to a private organization without a public notice allowing other organizations a chance to bid on the work. In addition, once a grantee moves beyond using other governmental services, an entire area of procurement requirements becomes mandated. These include things such as the method of procurements, dollar limits on some procurements, etc.

- 3) While the nature of a public health organization may mean that FS and FS eligible households will be involved, the organization must still validate that it meets one of the eligible target audience categories described in Table 1 of the Guidance. Additionally, the health care facility must meet the provisions of allowable FSNE activities, which states that health promotion and primary prevention of disease should be the focus and aim of FSNE activities. The disposition of these types of organizations already leans towards secondary prevention and medical nutrition therapy, which are not allowable FSNE expenditures.
- 4) Private (non-profit) health organizations receive the majority of their funding from Medicare/Medicaid. Activities funded under one Federal grant may not be billed to another Federal grant. Unless the State involved is dedicated in tracking these expenditures, it would be difficult to clearly document costs in this environment.

14. **WRO Question:** Regarding USDA's language on "reasonable hourly wages", how does this impact your review of the FY 08 Plans? What is the intent of the reference to the Federal minimum hourly wage?

Answer: Our review of salaries and benefits in the State Plan will not change from previous years. We will continue to review salaries/benefits to ensure that they are reasonable and commensurate with the FSNE activity being performed. The "Federal minimum hourly wage" provision is added to give you another option, if you are unable to identify a reasonable wage for the FSNE duty being performed.

The Guidance

15. **WRO Question:** We are concerned that the current selections for multi-year plan pilot States only represent small and non-network FSNE States. Is it possible to add either a larger FSNE program or a network State to the multi-year plan pilot test to assure that the results of the pilot represent an adequate cross-section of the variety of FSNE programs being implemented nationwide?

Answer: The pilot States have already been selected and there is not at this time an opportunity to add additional States to the pilot project. The multi-year pilot States were selected from a set of criteria developed by FNS. Once the criteria were developed, a State from each region was selected that best met those criteria. Whether a State was or was not a network State or the size of the FSNE program were not criteria used to select States. Depending on the results of the current pilot, there may be opportunities in the future for multi-year plan submissions by other States.

16. **WRO Question:** For all signed agreements (WSU has about 200), do you want hard copies as well as electronic copies for FY08? We have a large number of agreements because school districts have local control and make commitments and manage budgets locally. We probably could do a general agreement about school-based programming at the State level. Would that be sufficient to cover expectations of the MOU? We have significant cost share support coming from county government for their support of local county extension offices that deliver FSNE in the county. Since there is not an audience directly involved (as with schools and agencies where we work with the agency's clientele) is a Letter of Agreement (MOU) needed from the county governments for cost

share that supports program delivery? We would continue to have a Letter of Support and quarterly verifications that document the cost share.

Answer: The written agreements may be submitted in electronic format. It would suffice to have one overarching agreement with the State Dept. of Education to cover your school-based programs if the language included in the agreement would be applicable and binding for the local schools. For the county governments, if there is no "umbrella" organization that can sign an agreement on behalf of the local entities, then you would indeed need a written agreement with each.

17. **WRO Question:** The request that the State Plan be submitted as one document, not separate files (page 3 in the Guidance) – does this literally mean everything that is included in Templates 1 - 7, or does this mean everything in Templates 1 and 2, with budgets in a separate document? If it includes everything, it will be a HUGE file.

Answer: The Guidance states that Plans should not be longer than 150 pages plus appendixes, the 150 pages should be saved and submitted as one PDF. The remaining appendixes can be saved as separate files as long as they are numbered continuously and labeled appropriately so if the Plan does ever need to be printed out and reviewed by someone they can easily compile each section consecutively from beginning to end.

18. **SWRO Question:** In reference to the Guidance, pages 57-61, can Federal FS funds be used to purchase physical activity materials if they are kept as program supplies and are used with every group of participants, rather than given away as reinforcements? Would such supplies fit into the unallowable category of "equipment," which includes "bicycles, treadmills, stair steps, weights, and the like" (p. 60)?

Answer: Physical activity reinforcement items that contain a nutrition education message are subject to the not-to-exceed \$4 rule and are given to recipients in support of an educational lesson. These items should not be confused with teaching and demonstration supplies used for educational purposes. The purchase of physical activity supplies to demonstrate and teach physical education activities in the context of nutrition education *is allowed* based on the reasonable and necessary principle applied on a case-by-case basis. The assessment of whether such items are reasonable and necessary should be made in the context of the possibilities and low income means of the target audience. Thus, physical activity educational items demonstrated during FSNE sessions should be similar to what low-income people could afford to purchase or to simulate themselves (use of stairs in the home, ropes for jump ropes, weights made of household items, etc). The Guidance states on page 60 that "Costs incurred for health club or gym memberships, dues, equipment (such as bicycles, treadmills, stair steps, weights and the like)...are not allowed". Therefore, any physical activity supplies purchased for FSNE educational and demonstration purposes would not include large expenditures such as the equipment noted in the Guidance since they are not reasonable or necessary. They also are well beyond the means of most recipients. Allowable items would by necessity be of nominal value to meet the reasonable and necessary test. In this case, jump ropes used as supplies for demonstrating an easy and inexpensive physical activity would not be precluded from supplies that a nutrition education provider might purchase for FSNE.