

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0625:

SNAP-Ed Connection Sharing Form

Usha Kalro

Supplemental Nutrition Assistance Program, Program Accountability and Administration

Division

USDA, Food and Nutrition Service

3101 Park Center Drive, Room 820

Alexandria, VA 22302

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Attachment 1: Library Submission Form

Attachment 2: Burden Table

Attachment 3: Legal Authority

Attachment 4: Legal Authority Name change from Food stamps to SNAP

A1. Circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a revision of a currently approved information collection request. The National Agriculture Library originally hosted the SNAP-Ed Connection on its web servers, which was transferred to FNS in 2015; however, the associated ICR 0518-0031 was transferred to FNS only in 2017. In 2001, the United States Department of Agriculture's (USDA) Food and Nutrition Service established the SNAP-Ed Connection to improve access to SNAP Nutrition Education resources. In 2008, the Web site was renamed the SNAP-Ed Connection due to the change in Program name from Food Stamps to SNAP per the Food, Conservation, and Energy Act of 2008 (Pub.L. 110-234, H.R. 2419, 122 Stat. 923, Section 4001 enacted May 22, 2008, also known as the 2008 U.S. Farm Bill).

The Food and Nutrition Act of 2008, as amended (The Act) §28(c)(3)(A) states that State Agencies "may use funds provided under this section for any evidence-based allowable use of funds" including "(i) individual and group-based nutrition education, health promotion, and intervention strategies". 7 CFR §272.2(2)(d) also states that Supplemental Nutrition Assistance Program Education (SNAP-Ed) "activities must include evidence-based activities using one or more of these approaches: individual or group-based nutrition education, health promotion, and intervention strategies; comprehensive, multi-level interventions at multiple complementary organizational and institutional levels; community and public health approaches to improve nutrition".

The SNAP-Ed Connection is a resource Web site for SNAP-Ed administrators and educators. SNAP-Ed personnel use the SNAP-Ed Connection Web site to locate curricula, participant materials, nutrition research, administrative documents, and information regarding SNAP-Ed program development, implementation and evaluation. This resource Web site helps SNAP-Ed personnel find the tools and information they need to implement evidence-based obesity prevention programs.

Food and Nutrition Service encourages, but does not require or mandate, state/local SNAP-Ed programs to submit materials to SNAP-Ed Connection for inclusion in the SNAP-Ed Library Site. The authority for FNS to collect this information is contained in Section 28 of the Food and Nutrition Act (FNA) of 2008, as amended through P.L. 113–128.

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The SNAP-Ed Library is an online site of SNAP-Ed-related materials. The SNAP-Ed Connection Resource Sharing Form gives FNS SNAP-Ed Staff,, nutrition educators, nutrition education material developers and researchers, the opportunity to voluntarily share information about resources that can be used to administer, develop, implement, evaluate or showcase SNAP-Ed programs. SNAP-Ed personnel includes nutrient education instructors in State, Local, Tribal government and Business. Note that while there are links to three submission areas (for Educational Materials, Staff Training Materials, and Other Materials), each link goes to the same form.

Information collected via this electronic form enables the SNAP-Ed Connection staff (Federal contractors) and SNAP-Ed Federal staff, to review materials for possible inclusion in the SNAP-Ed Library. By using this site, SNAP-Ed-funded programs can share resources with each other, reduce duplication of efforts, and improve program quality. SNAP-Ed-funded programs can also learn about useful nutrition education materials created by other organizations.

Using the information gathered via the Sharing form, SNAP-Ed Connection staff has added over 800 materials to the SNAP-Ed Library site. The collection is ongoing to allow continuous additions to the site.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FNS seeks to comply with the E-Government Act of 2002, which promotes the use of technology to reduce respondent burden. The Resource Sharing Form is available electronically on the SNAP-Ed Connection Web site. SNAP-Ed personnel, nutrition education material developers, and other interested parties can search the SNAP-Ed Connection Web site to locate materials of interest, 100% of the information is collected electronically at <https://snaped.fns.usda.gov>.

A4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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The effort to provide updated resources to the SNAP-Ed community is on-going. The attached submission form will allow nutrition education material developers, SNAP-Ed personnel and researchers to submit nutrition education materials for review and inclusion into the SNAP-Ed library. There is no comparable resource for SNAP-Ed providers.

FNS solely administers and monitors the SNAP-Ed program. There is no similar information collection available.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The impact to small businesses and other small entities should be minimal, due to the voluntary nature of this data collection. Most submitters are expected to be members of academic institutions that develop nutrition education materials or SNAP-Ed State and Implementing Agencies. Out of 25 submitters, approximately 10% (or 2.5) are considered small businesses, which specialize in nutrition education, that choose to be submitters. This information collection has been held to the minimum required for the intended use.

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This is an ongoing information collection request. Failure of the SNAP-Ed Connection to collect this information would significantly inhibit the ability to provide up-to-date information on existing SNAP-Ed-funded materials and nutrition education materials that are appropriate for SNAP-Ed programs and providers. Without this information, SNAP-Ed programs would be less able to share resources and would be more likely to duplicate materials that have already been created.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- requiring respondents to submit more than an original and two copies of any document;**
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A Federal Register notice was published in the Federal Register on August 18, 2017, Volume 82, Number 159, pages 39404-39405. No comments have been received.

FNS consulted with the SNAP-Ed Regional Coordinators, the SNAP-Ed National Office Team and the SNAP-Ed Connection Contractors on relevant modifications on the information collection prior to submission to OMB. Though stakeholders were not directly consulted for this extension, the SNAP-Ed regional coordinators represented their interests while providing input for modifications. FNS has provided Attachment 1 to seven State Agencies for comments and recommendations. Responses received asked questions about formatting, but did not comment on the burden time to complete the form. Completion time was tested by SNAP-Ed Connection Contractors. This confirmed that program changes to streamline the form reduced the burden time 10 minutes (0.167 hours) from 19 minutes (0.3167 hours), a decrease of 9 minutes.

A9. Explain any decisions to provide any payment or gift to respondents. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment of gift was or will be provided to respondents.

A10. Assurances of confidentiality provided to respondents. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Department complies with the Privacy Act requirements. No private information is associated with this collection of information.

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Questions of a sensitive nature are not applicable to this information collection.

A12. Estimates of the hour burden of the collection of information. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The requested burden hours associated with this collection are shown in the burden charts below. The previous supporting statement for this form, which was approved, estimated 50 respondents each year for the three approved years. Based on historical data, it is

estimated that there will be 25 respondents with 110 responses annually. Program changes to streamline the form reduced the burden time 10 minutes (0.167 hours) from 19 minutes (0.3167 hours), a decrease of 9 minutes. Total estimated burden time for this data collection is estimated to be 18.37 burden hours, annually.

Respondent Type	Estimated Number of respondent	Estimated Frequency of Responses	Estimated Total Annual Responses	Estimated Time per Response	Estimated Annual Total Burden Hours
Business-for-Profit (private sector)	15	4	60	0.167	10.02
State, Local, & Tribal Government	10	5	50	0.167	8.35
Grand Total	25	4.4	110	0.167	18.37

SNAP-Ed Personnel will complete the survey. The total estimated cost to respondents is \$520.42. The cost to our respondents is based on the mean hourly wage of \$28.33 per hour (Bureau of Labor and Statistics Occupational Employment and Wages, May 2016, Dietitians and Nutritionists (<https://www.bls.gov/ooh/healthcare/dietitians-and-nutritionists.htm>)). Because SNAP-Ed is a 100% Federally funded program, there is no reimbursed cost to the State, Local or Tribal agencies.

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two

components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital and start-up, operation, maintenance, and purchase costs associated with this information collection.

A14. Provide estimates of annualized cost to the Federal government.

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The estimate of the total annual cost to the Federal government for this data collection is \$22,125.36. This includes contract cost of \$21,315.36, and Federal employee cost for salaries of GS 13 Step 5 who are Dietitians and Nutritionists at \$810.00.

It is estimated that federal employees receiving an average General Schedule (GS) grade 13 step 05 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf) wage take approximately 20 hours to complete this information collection. $\$40.50 \times 20 \text{ hours} = \810.00 .

This information collection assumes that a total of 176 contractor hours will be needed to review, monitor and upload the resources submitted to the SNAP-Ed Connection website. The hourly rate for the contractor performing this work is \$121.11. The total cost for this work will be \$21,315.36. ($\$121.11 \text{ hourly rate} \times 176 \text{ hours} = \$21,315.36$) Hourly rate was confirmed via phone call to contractor on April 6th, 2017.

Table A.14-1 Summary of Cost to the Federal Government

Source of Cost	Number of Respondents	Number of Hours	Hourly Rate	Total Cost
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Federal Employees (GS grade 13, step 5)	1	20	\$40.50	\$810
Contractor Labor		176	\$121.11	\$21,315.36
Total				\$22,125.36

A15. Explanation of program changes or adjustments.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a revision of a currently approved information collection request. The National Agriculture Library originally hosted the SNAP-Ed Connection on its web servers, which was transferred to FNS in 2015; however, the associated ICR 0518-0031 was transferred to FNS only in 2017. but in 2015, the SNAP-Ed Connection website was transferred to FNS. The current burden hours requested is 133 burden hours and 770 total annual responses; FNS is requesting 18.37 burden hours and 110 total annual responses. This revision reflects decreases of -115 hours and -660 total annual response which is due to an adjustment which from a decrease in the expected number of submissions to the site.

A16. Plans for tabulation, and publication and project time schedule.

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Approved submissions will be posted on the SNAP-Ed Connection website which is hosted by FNS at <https://snaped.fns.usda.gov/snap-ed-library>.

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

SNAP-Ed Connection is not seeking approval to exempt display of the expiration date for OMB approval.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

There are no exceptions to Item 19 of OMB Form 83-I.