SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

SNAP-Ed Toolkit Submission Form and Scoring Tool

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7 CFR § 272.2(2)(d)

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Appendices

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 new information collection request. The Food and Nutrition Act of 2008, as amended (The Act) § 28(c)(3) 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(d)(2) 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". SNAP-Ed State and Implementing Agencies are able to identify and choose evidence-based activities (interventions) using the *SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States* (Toolkit). The Toolkit is a publicly-available online searchable database of interventions which have been peer-reviewed to confirm that they are evidence-based for use in SNAP-Ed nutrition education and physical activity promotion activities. The website is currently hosted and maintained by the University of North Carolina at Chapel Hill. The Toolkit was developed collaboratively by FNS National and Regional Office SNAP-Ed staff, the National Collaborative on Childhood Obesity Reduction (NCCOR), and the Association of SNAP Nutrition Education Administrators (ASNNA). Currently, more than 80 interventions are available in the interactive online version of the Toolkit.

Because this was not a federally sponsored activity, ASNNA and NCCOR spearheaded the last

intervention submission and review process. These activities occurred outside of the purview of the federal government. A volunteer group of ASNNA members performed a preliminary review of interventions, followed by a secondary and final review by a small group of NCCOR members, who made the final decision regarding which interventions would be included in the Toolkit. Interventions were included if the group determined that they were evidence-based for use by SNAP-Ed. Information regarding inclusion criteria and reasons for exclusion from the Toolkit was limited or unavailable for intervention submitters. FNS National Office determined that FNS management of future intervention reviews would improve standardization and transparency of the review and Toolkit selection process.

Since States utilize the Toolkit to identify appropriate evidence-based interventions to fit a diverse array of State and local nutrition education and obesity prevention needs, a robust selection of interventions which include all SNAP-Ed allowable approaches is needed to improve program partners' effectiveness. The current Toolkit interventions available provide a limited offering of interventions of significant interest to States, such as those that include social marketing components, those which are evidence-based for use in specific groups at disproportionate risk of diet-related disease such as Hispanic/Latino populations, and those which are designed to work in settings of emerging importance to the field, such as retail and worksite locations.

This new data collection for additional interventions to be reviewed for inclusion in the Toolkit is necessary for the following reasons:

- Increase the selection available to Agencies to allow them to find interventions that fit their specific needs.
- Increase innovation in service delivery by encouraging adoption of interventions which

reflect the most up-to-date research of nutrition education, physical activity, and obesity prevention behavior change.

- Allow FNS to respond to requests by intervention developers to be included in the Toolkit with a clear and transparent review process and criteria for inclusion.

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 Intervention Submission Form (FNS-886) and Scoring Tool (FNS-885) allow for interventions to be assessed to determine if they are both evidence-based and use one of the intervention approaches described in The Act.

Intervention Submission Form (FNS-886)

- **Respondents:** The Intervention Submission Form (FNS-886) respondents will be intervention developers, who may be members of State, Local and Tribal agencies, non-profit businesses or for-profit businesses.
- **Data collection procedures:** Respondents will use the Intervention Submission Form (FNS-886) to provide information about the intervention they are submitting for inclusion in the Toolkit. Information requested includes what intervention materials are available, how they have been and will be used, and the evidence base which illustrates their effectiveness. Information is collected through a combination of multiple-choice boxes and text response areas.
- **Form pre-testing to determine burden:** To develop burden estimates, two intervention developers whose interventions were used in the previous, NCCOR/ASNNA led Toolkit

review pilot-tested the Intervention Submission Form (FNS-886) using the same interventions that were submitted to the NCCOR/ASNNA review. The maximum time for completion reported by the pilot testers was rounded up to the nearest hour to determine the burden hours.

- **Frequency of response:** Respondents are able to download, complete and submit the form once a year at any time, with an annual deadline for submission for the associated year's review. Download and submission will be through the SNAP-Ed Connection website (https://snaped.fns.usda.gov/). Completion is voluntary.
- **How the data collection will be used:** The Intervention Submission Forms (FNS-886) and attachments will be collected by FNS National Office SNAP-Ed staff and distributed to intervention reviewers. Intervention reviewers are respondents who will use the Scoring Tool (FNS-885) to help them determine if the intervention should be included in the Toolkit.

Scoring Tool (FNS-885)

- **Respondents:** Scoring Tool (FNS-885) respondents will be a panel of subject matter experts comprised of members of FNS National and Regional Office SNAP-Ed staff; nutrition program staff from other federal agencies such as CDC; staff of State, Local and Tribal agencies; non-profit businesses; or for-profit businesses.
- **Data collection procedures:** Respondents will use the Scoring Tool (FNS-885) to rate the intervention according to the quality of materials, usefulness for SNAP-Ed, and effectiveness as demonstrated by the evidence base provided. Numerical scores will be entered by respondents as well as qualitative responses which clarify why an intervention was or was not included in the Toolkit. Information is collected through a combination of numerical and text entry fields.

- **Form pre-testing to determine burden:** A pilot test of the Scoring Tool (FNS-885), using the two Intervention Submission Forms (FNS-886) completed during pre-testing of the Intervention Submission Form (FNS-886). The pre-testing was completed by two future Scoring Tool (FNS-885) respondents. The maximum time for completion of these six reviews was rounded up to the nearest hour to determine the total burden for the Scoring Tool. An additional one hour for training was further added to the burden.
- **Frequency of use:** The review period will occur annually, with respondents completing the Scoring Tool (FNS-885) to determine inclusion in the Toolkit over a three-month review and discussion period. Respondents using the Scoring Tool (FNS-885) participate as part of the panel of subject matter experts voluntarily.

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 is committed to complying with the E-Government Act, 2002 to promote the use of technology.

Intervention Submission Form (FNS-886):

Respondents to the Intervention Submission Form (FNS-886) will be able to download and save a PDF version of the form online at the SNAP-Ed Connection http://snaped.fns.usda.gov. Since respondents are predicted to need to be able to enter data into the form intermittently, rather than in a single session, a downloadable form is used to provide the respondents with the ability to save their responses on their own computers and return to their partially completed document at their convenience. There are currently no plans to create and launch a web-based tool. No

responses will be submitted electronically to FNS.

Scoring Tool (FNS-885):

Respondents to the Scoring Tool (FNS-885) will be able to download and save a PDF version of the form online at the SNAP-Ed Connection http://snaped.fns.usda.gov. Since respondents are predicted to need to be able to enter data into the form intermittently, rather than in a single session, a downloadable form is used to provide the respondents with the ability to save their responses on their own computers and return to their partially completed document at their convenience. There are currently no plans to create and launch a web-based tool. No responses will be submitted electronically to FNS.

A4. Efforts to identify duplication.

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.

The Toolkit is an ongoing collaborative effort of FNS, NCCOR, and the Regional Nutrition Education and Obesity Prevention Centers of Excellence (RNECE). There is no comparable resource for SNAP-Ed providers. Prior intervention submission and review efforts were led by subject matter experts from State, Local, and Tribal Agencies and not-for-profit institutions, and were not part of a federal data collection. For these intervention submission and review efforts, interventions were submitted and scored in a first-level review using tools developed by ASNNA. A second-level review was then completed by members of NCCOR and RNECE using a separate process which included contacting submitters for additional information about their reviews and further scoring and discussion of submissions prior to determination of inclusion or rejection from the Toolkit.

The attached Intervention Submission Form (FNS-886) and Scoring Tool (FNS-885) were

developed by a panel of subject matter experts comprised of FNS National and Regional SNAP-Ed staff, members of NCCOR, RNECE, and ASNNA. All members will use the same form for a single-level review and determination of inclusion in the Toolkit. This single-step process, using one set of publicly shared documents, will reduce duplicative efforts by these collaborating groups and should reduce the amount of follow up with submitters.

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 State, Local or Tribal Agencies or large non-profit and profit businesses. We estimate that approximately eleven (11) respondents, or 9 percent (9%) of all respondents, will be small businesses. Estimates were developed using historical data from the previous intervention review efforts. FNS was able to determine both the number of total responses and the type of respondents from historical data provided by leaders of the previous intervention review. FNS will be adopting best practices from the previous review, while streamlining the review process and increasing transparency for respondents.

For the Intervention Submission Form (FNS-886), four (4) non-profit business respondents are estimated to be small businesses. Two (2) for-profit business respondents are estimated to be small businesses.

For the Scoring Tool (FNS-885), three (3) non-profit business respondents are estimated to be small businesses. Two (2) for-profit business respondents are estimated to be small businesses.

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 a voluntary ongoing information collection.

State Agencies develop SNAP-Ed plans annually, and it is expected that they will be interested in finding up-to-date evidence-based interventions as they develop their plans. If the Intervention Submission Form (FNS-886) is not utilized, the amount of available evidence-based interventions in the Toolkit will not change annually, and SNAP-Ed Agencies may need to spend time looking for novel interventions which fit their specific planning and implementation needs, and determining if an intervention of interest is evidence-based. Agencies often have limited time to devote to this type of search and review. Reduced frequency of data collection using the Intervention Submission Form (FNS-886) could increase the adoption of interventions that are not evidence-based, which prevents SNAP-Ed from providing the highest possible quality of service to its participants. A lack of inclusion of new interventions will limit Agency access to the most current interventions which reflect up-to-date research and techniques.

If the Scoring Tool (FNS-885) is not utilized, there is no standard for intervention review, and the review process could be ineffective or nonexistent. This could cause frustration from intervention developers who work diligently to develop and promote their interventions, which, in turn, may cause fewer interventions to be developed for SNAP-Ed.

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. The collection of information is conducted in a manner consistent with the guidelines in 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.

A 60-day Notice was published in the Federal Register on August 18, 2017, page 39404, Vol. 82, No.159. Three (3) comments were submitted in reference to FNS-885 and FNS-886 and have been summarized below.

Summary of Comments:

Two Implementing Agencies and one private citizen submitted a total of three comments during the 60-day public comment period for the proposed Program Activity Statement information collection request. These comments are available for public inspection online at *www.regulations.gov*. Comments submitted varied in subject matter and a summary of each

document is below. The comment submitted by a private citizen expressed interest in the form and appreciation for its ability to encourage adoption of innovative practices and submission by diverse program stakeholders. One comment from an Implementing Agency provided suggestions for improvement or correction to specific questions on both forms. The second comment from an Implementing Agency provides both specific and general feedback related to both forms. Two commenters submitted comments addressing the burden of this proposed information collection. FNS responded to these comments via the method they were submitted and included them in this submission as attachments.

FNS has estimated one hour of training for the Scoring Tool, which has been incorporated into the total burden hours. No training will be needed for the Intervention Submission Form.

Intervention Submission Form (FNS-886) Comments:

- Introduction: One commenter requested a rewording of this section for clarification. The specific sentence referenced has been reworded.
- Section I. Question 3, 7: One commenter requests pluralization of specific words. These changes have been made
- Section I. Question 8, 12b: One commenter requests additional language for clarification. These changes have been made.
- Section I. Question 11: One commenter asked for clarification if the question refers to cost per participant. Since the question requests a cost for intervention or evaluation materials, rather than intervention implementation, and a following question asks for a description of applicable cost, the wording will remain as is.
- Section II. Question 14: One commenter asked for healthy beverages to be included with healthy eating. This change has been made.

- Section IV. Question 22: One commenter suggested moving instructions guiding participants to the *SNAP-Ed Evaluation Framework* to this question. Additionally, this commenter suggested using the same verbiage for outcome measures as is found in the *SNAP-Ed Evaluation Framework Interpretive Guide*. These changes have been made.
- Section V. Question 28: One commenter suggests adding worksite as a category since this is underrepresented in the existing *Toolkit*. The commenter also suggested including subcategories of "pre, elementary, high" for schools. In order to keep the submission tool categories aligned with those in the *Toolkit*, this question will not be changed.
- Section V. Question 29: One commenter suggests specific verbiage to clarify information requested in the form. This change has been made.
- Section V. Question 32: One commenter asks if this question can be combined with question number nineteen (19). Since this question seeks to understand past use, while question 19 seeks to understand intent, the questions will not be merged. However, clarifying language had been added to this effect.
- Section V. Question 33: One commenter asks if this question can be combined with question thirty (30). Since question 33 specifically asks about unsolicited requests to participate in the intervention, this change will not be made.
- One commenter suggested that separate forms be developed for separate intervention strategies. This would result in separate forms for direct education, social marketing, and policy, systems, and environmental change interventions. Since this would create several forms while not accommodating interventions which use a combination of strategies, this change will not be made. This commenter also suggested a multi-step submission process, which has been determined to be overly burdensome for the *Toolkit* working group. One

commenter suggested consolidating all descriptive response areas and separately consolidating all response areas that would be evaluated using the Scoring Tool. FNS feels that this organization is not likely to reduce reporting burden for submitters, so this change will not be made.

Intervention Scoring Tool (FNS-885) Comments:

- Intervention Submission Form (FNS-886) Questions Referenced on Scoring Tool (FNS-885): The Scoring Tool references specific questions on the Intervention Submission Form to be used to determine scores for each scoring response area. FNS has corrected or added these questions as suggested.
- Scoring Tool Questions, Reach: One commenter asked a question about a specific term definition. This term, among others, will be defined in the Scoring Tool training. The commenter suggested that intervention appropriateness cannot be determined without reviewing intervention materials. This has been included as a material for review for this question. One commenter expressed concern about number of institutions reached as a factor for a high score, as this information is not captured in the SNAP-Ed Education and Administrative Reporting System (EARS) form (FNS-759, OMB No. 0584-0594, Expiration Date; 09/30/2019). Interventions may be developed by submitters who are not familiar with the EARS form (FNS-759, OMB No. 0584-0594, Expiration Date: 09/30/2019). Since PSE interventions with emerging or practice-based evidence may not have been fully evaluated to understand reach to individuals, the use of institutions reached has been included to allow for flexibility in evidence provided.
- Scoring Tool Questions, Effectiveness: One commenter suggests that there should be different overarching questions than reach asked. Several questions are provided that request

reviewers to evaluate effectiveness of the intervention using factors other than individuals/institutions reached in this section. A commenter states that clarification is needed in the Intervention Submission Form Question 27 to specifically request process evaluation materials. Descriptive language requesting these materials has been added to the instructions for this question. One commenter requests that different verbiage is used in the factors for high score related to participant and partner acceptability. Unfortunately, no verbiage has been provided by the commenter to explain what changes would be recommended. One commenter suggested that the strength of evidence should be weighted regarding evidence base for the intervention stage of development. The workgroup expressed significant concern that additional score weight placed on certain forms of evidence, such as randomized control trials, could prevent the use of emerging or practice-based interventions that are not able to be evaluated using such rigorous standards, which may limit innovation in the field. The question will remain as is. One commenter suggests that questions be reordered for improved readability and process flow. This change had been made according to the commenter suggestions. One commenter called out duplication in questions in the form. This error has been corrected.

- Scoring Tool Questions, Adoption: One commenter called out an error in the question number referenced on the Intervention Submission form. This error has been corrected. One commenter suggested that previous use of interventions with a low-income audience should be used as a screening question, rather than an evaluative question. In order to accommodate interventions that have not been used previously with low-income audiences, but are generalizable to this population, the question will remain. However, the commenters recommended “0” score for interventions that have not been previously used with low-

income populations is applied. One commenter suggests that evaluating interventions on their ability to interact with partners who affect multiple levels of the SNAP-Ed Evaluation Framework or SEM will rarely be possible for direct education products. Since the SNAP-Ed program has placed a priority on activities which address multiple levels of the SEM, the question remains.

- Scoring Tool Questions, Implementation: One commenter suggests that availability of training materials and implementation directions do not reflect the quality of an intervention. Since a lack of training materials or implementation directions can reduce the fidelity of intervention implementation and its resulting effectiveness, the question remains. The question is given a small point value of 2 out of 100 points to address this concern. One commenter expressed concern that reviewers will not be able to assess implementation directions without reviewing original intervention materials. This tool has been designed with the expectation that a thorough review of intervention materials is necessary for evaluation of its inclusion in the *Toolkit*, and this expectation will be included in reviewer training. One commenter asks if consideration should be made to the cost of training materials and methods. Questions regarding intervention materials cost and sustainability concerns are included in the Scoring Tool, which FNS believes adequately addresses this concern without placing undue bias against interventions which provide materials at cost.
- Scoring Tool Questions, Maintenance: One commenter stated that the question related to sustainability did not reference an applicable question in the Intervention Submission Form. This reference has been changed. One commenter expressed concerns about evaluating interventions according to resource cost. As other parties have expressed concern about excluding this as an evaluation metric, questions related to cost will remain in the tool.

These questions are assigned a minimal point value.

- One commenter suggested separate scoring criteria for separate intervention strategies. FNS feels that this could result in scores that are not equitable across interventions, and may risk reviews which prioritize some intervention strategies over others. This suggestion will not be utilized.
- One commenter expressed concern about a lack of transparency regarding the review process and review standards. To address this concern, FNS will develop a one-hour reviewer training webinar for respondents using the Scoring Tool (FNS-885) which explicitly describes the review process, including number of reviewers per intervention, scoring thresholds for inclusion, and process of aligning scores. The training will be provided 12 weeks after this form is approved. This training will be made available to the public online at the SNAP-Ed Connection website, within the page which will host the Intervention Submission Form (FNS-886) and Scoring Tool (FNS-885). The total burden for the Scoring Tool (FNS-885) training is estimated to be 33 hours.
- One commenter objects to the use of the RE-AIM framework to evaluate intervention submissions, as this tool was developed for planning and implementation of interventions. FNS recognizes that this is not an ideal use of this tool, but believes that this is a helpful organization of question topics for submitters and reviewers, as the RE-AIM framework examines specific qualities of an intervention such as number of participants reached and adoption by program partners. The panel of subject matter experts which has provided feedback on the design and implementation of the Intervention Submission Form (FNS-886) and Scoring Tool (FNS-885) have not expressed this concern.
- One commenter expressed concern that the Scoring Tool (FNS-885) does not appropriately

evaluate interventions submitted, particularly in relation to intervention material cost and audience appropriateness. Since intervention material cost may prohibit an intervention from being of use to State and Implementing Agencies, this item will continue to be scored, although a minimum amount of points has been assigned. The question related to appropriateness will remain, as interventions which are not evidence-based for use with a low-income audience, or for their intended audience, would not be eligible for implementation for SNAP-Ed.

- One commenter expressed concern about the use of bonus points for interventions which are currently underrepresented in the Toolkit. The workgroup has expressed significant concern that interventions which address an unmet need within the field should be prioritized for inclusion. However, only one point per bonus point category, resulting in a total of 3 out of 100 points, are available for bonus points, so FNS does not believe this will cause undue impact to the scoring of an intervention.

Burden Hours:

Two commenters expressed concern that the estimated burden hours are too low. One commenter suggested using the maximum amount of time indicated by pilot testers to complete the forms. FNS has adjusted the burden hours to reflect the maximum burden time reported for each form, rounded up to the nearest full hour. One additional hour of burden was added to the burden time for the Scoring Tool (FNS-885) to account for training. The total burden for the Scoring Tool (FNS-885) training is estimated to be 33 hours.

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.

The attached Intervention Submission Form (FNS-886) and Scoring Tool (FNS-885) were developed by a panel of subject matter experts comprised of FNS National and Regional SNAP-Ed staff, as well as members of the CDC, NCCOR, RNECE, and ASNNA. Two respondents from non-profit businesses, whose interventions were used in the previous Toolkit review, pilot-tested the Intervention Submission Form (FNS-886) using the same interventions that were submitted previously. Their contact information is available below:

1. Marci Scott, PhD, RDN
   Michigan Fitness Foundation
   Interim Co-President & CEO
   Vice President of Health Programs
   MScott@michiganfitness.org
2. Kimberly J.M. Keller, Ph.D.
   Assistant Research Professor, Dept. Nutrition and Exercise Physiology
   Evaluation Coordinator, Human Environmental Sciences Extension
   KellerKJ@missouri.edu

A pilot test of the Scoring Tool (FNS-885), using the two interventions provided for the Intervention Submission Form (FNS-886), was completed by two future reviewers from non-profit businesses. Their contact information is available below:

1. Tracy Dearth Wesley
   University of North Carolina at Chapel Hill
   twesley@email.unc.edu
2. Susan B. Foerster, MPH, RD (Ret)
   Emeritus Member and Co-Chair, Evaluation Committee
   Association of SNAP Nutrition Education Administrators (ASNNA)
   sfoerster@comcast.net

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 or gift will be offered 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 1974 requirements.

Intervention Submission Form (FNS-886): While respondents to the Intervention Submission Form (FNS-886) are required to provide their name, institution and contact information, only the organization name and organizational contact information will be published. Prior to publishing, the respondent will be asked to confirm contact information that they wish to be publicly shared. FNS staff will use the individual contact information of respondents only to contact the respondent for necessary information, such as preferred organizational contact information. Only FNS staff will have access to the respondents individual contact information and this information will not be shared with others or posted online.

Scoring Tool (FNS-885): Scoring Tool (FNS-886) respondents will not know the identity of the other respondent(s) that are completing the Scoring Tool (FNS-886) for the same intervention unless their scores are disparate by greater than 20 points. At this time, FNS will contact the group of respondents so that they may hold a discussion to align the scores for the intervention. Any comments or additional information provided by the group of respondents will also be de-identified and aggregated prior to sharing among this group of respondents. For any response to the Intervention Submission Form (FNS-886) that has been reviewed, associated Scoring Tool (FNS-885) respondent comments from the final three comment boxes on page five (5) of the Scoring Tool (FNS-885) will be aggregated and de-identified prior to sharing with respondents of the Intervention Submission Form (FNS-886) for that specific reviewed intervention. Intervention Submission Form (FNS-886) respondents will not be provided with the names of associated Scoring Tool (FNS-885) respondents of their intervention upon request.

A Federal Register Notice was published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports. Names and phone numbers will not be linked to participants' responses, tracked mail, or telephone; and will be stored in locked file cabinets or by password. This information is safeguarded at the Supplemental Nutrition Assistance Program, Program Accountability and Administration Division, in FNS Headquarters office in a host computer database. The host computer server which contains the FNS-885 and FNS-886 form information stored in the database is located at FNS' Office of Information Technology in Alexandria, Virginia[1].

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.

No sensitive questions will be asked about individuals in this data collection. Information regarding ethnicity, race and other status such as breastfeeding are referring to populations that may be served by interventions submitted using the Intervention Submission Form (FNS-886). These questions are not used to describe individuals.

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.

The affected public for this information is State, Local, or Tribal Governments, Not-for-profit

[1] Published in the *Federal Register* on April 25, 1991 (56 FR 19078).

institutions, and business or other for-profit institutions. The total number of respondents to this burden collection is estimated to be 127 annually, with a total of 160 annual responses, for total burden hours for this data collection estimated at 668 hours annually. In addition to the pretesting, the total number of expected responses was developed using historical data from the previous intervention review, which included the total number of respondents and type of respondent. The requested burden hours associated with this collection are shown in detail in the burden charts below. There is no recordkeeping burden associated with this data collection.

Intervention Submission Form (FNS-886) Burden Estimation:

The total number of respondents to the Intervention Submission Form (FNS-886) is estimated to be 59 annually, with a total of 59 annual responses, for total burden hours for this data collection estimated at 295 hours annually. Two Intervention Submission Form (FNS-886) respondents whose interventions were used in the previous Toolkit review pilot-tested the Intervention Submission Form using the same interventions that were submitted during the previous NCCOR/ASNNA-led Toolkit review. The maximum time for completion reported by the pilot testers was rounded up to the nearest hour to determine the burden hours. Since instructions for each question are provided on the form, no training will be developed for the Intervention Submission Form (FNS-886).

Scoring Tool (FNS-885) Burden Estimation:

The total number of respondents to the Scoring Tool (FNS-885) is estimated to be 68 annually, with a total of 101 annual responses, for total burden hours for this data collection estimated at 373 hours annually. A pilot test of the Scoring Tool (FNS-885), using the two interventions provided for the Intervention Submission Form (FNS-886), was completed by two reviewers who participated in the NCCOR/ASNNA-led Toolkit review process. The maximum time for

completion of these four reviews was rounded up to the nearest hour to determine the total burden for the Scoring Tool (FNS-885). One additional hour was added to this burden for completion of a one-hour training to help respondents use the Scoring Tool (FNS-885).

Table A.12-1 Reporting estimates of hour burden.

Respondent Category	Type of Respondents	Instruments	Form	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (hours)
State/Local/Tribal Government	SNAP-Ed State and Implementing Agency Dietitians & Nutritionists	Intervention Submission Form	FNS-886	39	1	39	5	195.0
		Scoring Tool	FNS-885	22	2	44	5	220.0
		Scoring Tool (Training)	FNS-885	22	1	22	1	22.0
SUBTOTAL: State/Local/Tribal Government				83	1.2651	105	4.1619	437.0
Business, Non-Profit	Biological Sciences Teachers, Postsecondary	Intervention Submission Form	FNS-886	15	1	15	5	75.0
		Intervention Submission Form (Pretesting)	FNS-886	2	1	2	5	10.0
		Scoring Tool	FNS-885	7	2	14	5	70.0
		Scoring Tool (Pretesting)	FNS-885	2	1	2	5	10.0
		Scoring Tool (Training)	FNS-885	7	1	7	1	7.0
SUBTOTAL: Business, Non-Profit				33	1.2121	40	4.3000	172.0
Business, Profit	Dietitians and Nutritionists	Intervention Submission Form	FNS-886	3	1	3	5	15.0
		Scoring Tool	FNS-885	4	2	8	5	40.0
		Scoring Tool (Training)	FNS-885	4	1	4	1	4.0
SUBTOTAL: Business, Profit				11	1.3636	15	3.9333	59.0
TOTAL				**127**	**1.2598**	**160**	**4.1750**	**668.0**

B.Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The estimate of respondent cost for the Intervention Submission Form is based on the burden estimates developed in 12(A) above. Annual respondent cost prior to federal cost sharing is estimated at $13,273.94. Based on the Bureau of Labor Statistics May 2016 Occupational and Wage Statistics – 29-1031 (https://www.bls.gov/oes/2016/may/oes291031.htm), hourly mean wage for dietitian and nutritionists, who are employed through State and Implementing Agencies and not-for-profit or private entities, are valued at $28.69 per staff hour. Hourly mean wage for biological sciences teachers in postsecondary education institutions is $43.47 per staff hour based on the Bureau of Labor Statistics May 2016 Occupational and Wage Statistics – 25-1042 (https://www.bls.gov/oes/2016/may/oes251042.htm), divided by an estimated 2,080 working hours per year. Costs are summarized in table B.12-1.

Table B.12-1 Cost Summary

Respondent Category	Type of Respondents	Instruments	Form	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
State/Local/Tribal Government	SNAP-Ed State and Implementing Agency Dietitians & Nutritionists	Intervention Submission Form	FNS-886	39	1	39	5	195.0	$28.69	$5,594.55
		Scoring Tool	FNS-885	22	2	44	5	220.0	$28.69	$6,311.80
		Scoring Tool (Training)	FNS-885	22	1	22	1	22.0	$28.69	$631.18
SUBTOTAL: State/Local/Tribal Government				83	1.2651	105	4.1619	437.0		$12,537.53
Business, Non-Profit	Biological Sciences Teachers, Postsecondary	Intervention Submission Form	FNS-886	15	1	15	5	75.0	$43.47	$3,260.25
		Intervention Submission Form (Pretesting)	FNS-886	2	1	2	5	10.0	$43.47	$434.70
		Scoring Tool	FNS-885	7	2	14	5	70.0	$43.47	$3,042.90
		Scoring Tool (Pretesting)	FNS-885	2	1	2	5	10.0	$43.47	$434.70
		Scoring Tool (Training)	FNS-885	7	1	7	1	7.0	$43.47	$304.29
SUBTOTAL: Business, Non-Profit				33	1.2121	40	4.3000	172.0		$7,476.84
Business, Profit	Dietitians and Nutritionists	Intervention Submission Form	FNS-886	3	1	3	5	15.0	$28.69	$430.35
		Scoring Tool	FNS-885	4	2	8	5	40.0	$28.69	$1,147.60
		Scoring Tool (Training)	FNS-885	4	1	4	1	4.0	$28.69	$114.76
SUBTOTAL: Business, Profit				11	1.3636	15	3.9333	59.0	$28.69	$1,692.71
TOTAL				**127**	**1.2598**	**160**	**4.1750**	**668.0**		**$21,161.97**

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/start-up or ongoing operation/maintenance 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 $11,641.38. This includes contract cost of $7,024.38 and Federal employee staff cost of $4,617.00.

This information collection assumes that a total of 58 contractor hours will be needed to upload the Intervention Submission Form (FNS-886) and Scoring Tool (FNS-885) to the SNAP-Ed Connection website and review each intervention submitted for completion. The hourly rate for the contractor performing this work is $121.11. The total cost for this work will be $7,024.38. $121.11 hourly rate x 58 hours = $7,024.38. Hourly rate was confirmed via email by contractor on June 6, 2017.

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 114 hours to complete this information collection. $40.50 x 114 hours = $4,617.00.

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

Source of Cost	Number of Respondents	Number of Hours	Hourly Rate	Total Cost
Federal Employees (GS grade 13, step 5)	12	114	$40.50	$4,617.00
Contractor Labor		58	$121.11	$7,024.38
Total	65	468		$11,641.38

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 new information collection request which will add 668 burden hours and 160 responses to the FNS OMB inventory due to program changes.

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.

Results of review and determination of inclusion will be sent to submitters no less than four months after the submission deadline for the review period. For interventions that are not included in the Toolkit, Intervention Submission Form (FNS-886) respondents will be provided consolidated Scoring Tool (FNS-885) responses which do not include the names or other contact or identifying information of the respondents. This allows Intervention Submission Form (FNS-886) respondents to understand why their interventions were not included, and recommended areas for improvement should they choose to resubmit at a later date.

After review, summary information about interventions which are included in the Toolkit will be publicly available online at https://snapedtoolkit.org/. This information will be available online approximately three months after the results have been sent to submitters.

Table A.16-1 Project Time Schedule

Activity	Time Schedule
Call for intervention submissions using the Intervention Submission Form (FNS-886)	Annually after OMB approval
Review of submitted interventions for completion	1 month after call for submissions
Scoring Tool (FNS-885) respondent training webinar	1 month after call for submissions
Distribution of interventions to reviewers, review of interventions	Immediately following reviewer training
Reviewer team review and scoring as needed	6 weeks after distribution of interventions to reviewers
FNS final disposition, as needed, for irreconcilable scores	1 month after team review and scoring
Response to intervention submitters	2 weeks after FNS final disposition

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.

FNS plans to display the OMB approval number and the expiration date on this information

collection.

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 the certification statement.