

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-0625:

SNAP-Ed Connection Resource Sharing Form

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Attachments

Attachment 1: SNAP-Ed Connection Resource Sharing Library Submission Form FNS

889 Screenshots

Attachment 2: Excel Burden Estimate

Attachment 3: Legal Authority the Food and Nutrition Act of 2008

Attachment 4: Legal Authority 7 CFR 272.(2)(d)

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 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.

This is a voluntary information collection. Food and Nutrition Service encourages, but does not require or mandate, state/local SNAP-Ed programs to submit nutrition education resource materials items using the FNS-889 to the 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 (FNS 889) 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 include nutrition education instructors in State, Local, Tribal government and Business.

FNS consulted on relevant modifications on the information collection prior to submission to OMB. On December 4, 2020, FNS had a conference call to discuss the submission from and any necessary modifications. Once we received recommendations, FNS developed the final version.

Thirteen (13) revisions made to the FNS-889 are as follows:

- Removal of the question on Race and Ethnicity
- Addition of Data element: Addition of the terms “Required Field” to the *Year the material was developed* section
- Addition of Data element: Adding the term “Website” to clarify instructions for multiple links in the *website* section
- Addition of Data element: Addition of language “please add any additional information

- about cost” to the *Cost* section
- Addition of Data element: Addition of a Yes/No question: Is this resource part of the SNAP-Ed Toolkit? to the *Toolkit* section
 - Addition of Data element: Addition of two fields – “Emerging” and “N/A” to the *Evidence* section
 - Addition of Data element: Addition of language “ summarize evaluation efforts and results here” to the *Evaluation text box* section
 - Addition of Data element: Addition of the word “Related” to the *Research Article field* section
 - Addition of Data element: Addition of the word “Article” to the “Add Another” button section
 - Addition of Data element: Addition of “Select all that apply” to the *Audience, Settings and Format* Sections
 - Addition of Data element: Addition of a field “Remote/at-home/virtual” to the *Setting* section
 - Addition of Data element: Addition of a field “Remote/Virtual Learning” to the *Format* section
 - Addition of Data element: Addition of “Adding option for “other” with write in box” in the *Language* section

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 900 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 FNS 889 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 [www.https://snaped.fns.usda.gov](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.

The effort to provide updated resources to the SNAP-Ed community is on-going. The attached submission form FNS 889 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. FNS anticipate most respondents are members of academic institutions that develop nutrition education materials or SNAP-Ed State and Implementing Agencies. Out of 25 respondents, approximately 10% (or 2.5 rounded to 3) 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 published in the Federal Register on February 16, 2021, Volume 86, Number 29, pages 9477 - 9478. FNS has not received any public comments.

As part of a continuous improvement process, FNS consulted with the SNAP-Ed National Office Team and the SNAP-Ed Connection Contractors on relevant modifications on the information collection prior to submission to OMB. On December 2 2020, FNS Contractor staff Janice Schneider and Mary Rooks had a conference call with FNS National Office SNAP-Ed Staff Lisa Mays and Usha Kalro to discuss the submission form and any necessary modifications. Once we received recommendations, FNS Contractor staff developed the final version. The list of names and phone numbers of FNS and Contractor staff is below:

1. Lisa Mays, Nutritionist, FNS National Office – 703-457-7762
2. Usha Kalro, Nutritionist, FNS National Office – 703-305 -2397
3. Janice Schneider, Consulting Nutritionist, FNS Contractor – 443-812-6956
4. Mary Rooks, Consulting Nutritionist, FNS Contractor – 703- 801-1076

In addition to the FNS Staff and contractors listed above, three external stakeholders identified below consulted directly on this information collection: Suggestions to

improve the form FNS-889 were incorporated to improve the submission process.

Changes to the form are outlined on Page 5.

1. Laryessa Worthington MS RD LDN
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SNAP-Ed Maryland
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2. Sara Beckwith MS, RDN, LD
WIC State Director
Nutrition and Physical Fitness Bureau DC Health
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3. Sara Wilson Wolfe MS, RD
SNAP-Ed Program, Stakeholder Relations
Oregon State University
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Telephone number: 971-361-9622

**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 of 1974 requirements. No private information is associated with this collection of information. On December 4, 2020, Miguel Marling, the FNS Privacy Officer stated in an email that “the link to the Departmental Privacy Page at the bottom of the website meets the standard, and no particular, additional Privacy concerns exist for the FNS-899. Neither a Privacy Act Statement nor Privacy Act Advisory is necessary in this case”.

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. The FNS-889 is not requesting information of a sensitive nature.

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 requested burden hours associated with this collection are shown in the burden charts below. Based on the number of SNAP-Ed programs, it is estimated that there will be 25 (15 Business-for-Profit and 10 State, Local & Tribal Government) who will respond approximately 4 times per Business-for-Profit respondents and 5 times per State, Local & Tribal Government respondents. The estimated total annual responses is 110 (60 total annual responses from Business-for-Profit and 50 total annual responses from State, Local & Tribal Government). The estimated hours per response for each affected public are based on the length of time to log in to the website, read instructions and respond to

the survey. FNS anticipates it will take approximately 10 minutes (0.167) to complete the form for each group, for a total burden of 18 hours.

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

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

SNAP-Ed Personnel will complete the survey. The total estimated cost to respondents. (with fully loaded wages is \$741.02 (557.16 annual base cost + \$183.86 fringe benefits. We used 0.33 percent to account for fully-loaded wages). The cost to both our respondents (Business-for-Profit and State, Local & Tribal) is based on the mean hourly wage of \$30.33 per hour (Bureau of Labor and Statistics Occupational Employment and Wages, January 2021, 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 \$24,870.96. This includes contract cost of \$23,446.72. The contract cost is a fixed rate cost therefore, fringe benefits are already added into the contract cost. Additionally, this information collection assumes a total of 20 hours of Federal employee time to draft this information collection for a GS-13 step 5 at \$57.39 per hour of fully loaded wages (\$ 43.15+ 14.24) for 20 hours, for a total of \$1,147.79, for two hours to review and sign by the Branch Chief , GS-14, step 5 at \$135.66 per hour of fully loaded wages (\$ 51.00 + 16.83) for a total of \$135.66, for two hours to review and sign by the Division Director, GS-15, Step 1 at \$70.39 per hour of fully loaded wages (\$52.93+17.46) for a total of \$140.79. The table Federal General Schedule is available at [Salaries & Wages \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salaries/) was used for all cost calculations.

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 \$133.22. The total cost for this

work will be \$21,315.36. (\$133.22 hourly rate x 176 hours = \$23, 446.72) Hourly rate was confirmed via phone call to contractor on April 22, 2021.

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

Source of Cost	Number of Respondents	Number of Hours	Hourly Rate	Sub-Total Cost	Fully-loaded Wages Adjusted Hourly Wages	Grand Total Cost w/Fully-loaded Wages
Federal Employees (GS grade 13, step 5)	1	20	\$43.15	\$863.00	\$57.39	\$1,147.79
Federal Employees (GS grade 14, step 1) Branch Chief	1	2	\$51.00	\$102.00	\$67.83	\$135.66
Federal Employ Division Director (GS15, Step 1)	1	2	\$52.93	\$105.86	\$70.39	\$140.79
Subtotal cost for Federal Gov't Fringe Benefits						\$1,424.24
Contractor Labor		176	\$133.22	\$23,446.72	Fringe included in cost	
Subtotal cost for Contractors w/ Fringe Benefits already included						\$23,446.72
Grand Total Annual Cost for Federal and Contractor Cost						\$24,870.96

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. There was a change in the instrument however the change did not affect the respondents, responses or burden hours. There are 25 total annual respondents for this data collection. The current inventory for this data collection is 18 total annual burden hours and 110 total annual responses. FNS is requesting 18.37 total annual burden hours (rounded down to 18) and 110 total annual responses.

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.