**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0639:**

**SNAP-Ed Toolkit Submission Form and Scoring Tool**

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7 CFR § 272.2(2)(d)

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# 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. 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 150 interventions are available in the interactive online version of the Toolkit. This revision to the currently approved information collection includes updates to the Toolkit Submission Form (FNS-886) and Scoring Tool (FNS-885) to allow for additional interventions to be reviewed for inclusion in the Toolkit. These revisions are 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.
* Improve efficiency and reduce burden by streamlining forms based on experience and use feedback.

# 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.**

Under 7 CFR § 272.2(d)(2), 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 are intervention developers, who may be members of State, Local and Tribal agencies, non-profit businesses or for-profit businesses.
* **Data collection procedures:** Respondents 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.
* **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 are 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.

FNS conducted a small-scale pilot test of the FNS-886 with three stakeholders. For the FNS-886, the following updates are projected:

* In Section I, the replacement of a fill-in-the blank space with “Yes or No”, and an additional sentence encouraging submitters to reference the materials they attach in the appendices.
* In Section II, new questions casking the submitter to list the approaches used in their intervention, and definitions to accompany a question requiring submitters to identify their intervention from a series of approaches listed in checkboxes.
* In Section III, a renumbering of questions due to the insertion of new questions in Section II.
* In Section IV, a new question asking submitters to identify tools they used to evaluate their intervention, a simplified question on which outcomes the intervention achieved, and an increased character limit on a question on evidence findings included in the submission. This section also includes minor updates for readability, and renumbering to reflect the newly inserted questions.
* In Section V, renumbering to reflect newly inserted questions.
* In Section VI, a clarification of what training is required to implement the intervention, as well as renumbering to reflect newly inserted questions.
* In Section VII, new instructions clarifying that submitters should describe how evaluation and modification addressed intervention sustainability concerns, and renumbering to reflect newly inserted questions.
* In Section VIII, additional instructions to help developers name and reference their attachments throughout the submission form.
* In Section IX, additional instructions to help developers name and reference their attachments throughout the submission form.

**Scoring Tool (FNS-885)**

* **Respondents:** Scoring Tool (FNS-885) respondents are 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 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 are 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.
* **Frequency of use:** The review period occurs 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.

For the FNS-885, the following updates are projected:

* In Section I, the addition of one scoring factor and the modification of another to encourage reviewers to reflect on aspects of equity.
* In Section II, the removal of two scoring factors to reduce options and the modification or insertion of eight existing or new prompts for clarity and to give reviewers the opportunity to reflect more fully on the effectiveness of the submitted intervention.
* In Section III, the removal of one question to reduce burden, and minor edits throughout to streamline and improve readability.
* In Section IV, the removal of one question to reduce burden, the modification of one prompt to explicitly reference intervention cost, and minor edits for readability.
* In Section V, the removal of a scoring factor not requested in FNS-886 (Submission Form), the inclusion of cost as a factor in keeping with Section IV, and the removal of a reviewer comments section to reduce burden.
* In the Bonus Questions, an updated list of underrepresented settings, reflecting the current body of SNAP-Ed Toolkit resources, for which interventions can be awarded bonus points, and the insertion of a new question to allow reviewers to reflect on the quality of materials submitted throughout the review process.

# 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. Both forms in this information collection are distributed to submitters and evaluators digitally, and instructions and other supporting information for submitters is available at <https://snapedtoolkit.org/interventions/submit-an-intervention>.

The SNAP-Ed Toolkit provides respondents to the Intervention Submission Form (FNS-886) with a unique link to an online version of the form, which they can complete as their time allows. The online FNS-886 temporarily saves completion progress in Qualtrics online software, allowing respondents to return to partially completed forms, as needed. Once complete, respondents to the FNS-886 submit the form for review online. Respondents to the Scoring Tool (FNS-885) complete scores offline, which are then emailed to the Toolkit for determination of review results. The Toolkit website hosts training webinars and examples of completed forms online at <https://snapedtoolkit.org/interventions/submit-an-intervention/> so that respondents can refer to training materials as needed during completion. Although 100 percent of the forms for the FNS 886 are submitted electronically, FNS estimates approximately 40 percent of this information collection is electronic due to the mix-modes of data collection taking place either offline, online and through webinar training.

# 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.**

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. The Toolkit operates through a cooperative agreement between FNS and the University of North Carolina at Chapel Hill, and is the only resource for the program which updates the selection of evidence-based interventions through a peer-review process on a regular basis. Although alternative databases of evidence-based interventions exist, the interventions and activities listed within these sites are not reviewed specifically for appropriateness for the SNAP-Ed program.

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, , ASNNA, and SNAP-Ed State and local implementing agencies. No other data collection for the SNAP-Ed program specifically requests detailed information about the evidence base for, or to help others evaluate the evidence base for, interventions used in SNAP-Ed. All interventions must be appropriate for SNAP-Ed in that they are suitable for use with low-income audiences, have sufficient evidence to support their effectiveness when used with low-income audiences, and include activities which are allowable within statutory and regulatory requirements for the SNAP-Ed grant program.

# 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 6 percent (6%) of all respondents, will be small businesses.

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 are 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) will likely 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 becomes 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.**

**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 April 27, 2021, Volume 86, Number 79, pages 22132 – 22134; FNS received a total of two public comments, 1 germane comment which provided general support for the necessity and practical utility of the information collection but did not provide any specific feedback for FNS consideration. No clear contact information for the commenter was received for the germane comment. FNS received 1 comment that was not germane to this information collection. Because the germane comment FNS received was purely supportive of this information collection, FNS has not made any changes to as a result of commenter feedback.

As part of a continuous improvement process, FNS consulted with the SNAP-Ed National Office Team and the SNAP-Ed Toolkit team at the University of North Carolina, Chapel Hill’s Center for Health Promotion and Disease Prevention, with which FNS has a cooperative agreement. In fall and winter of 2020, the Toolkit team used FNS feedback, internal evaluations, and user feedback from past review cycles to generate a list of proposed updates for the FNS-885 and FNS-886. Updates were pilot tested and evaluated by program partners from federal government agencies, universities, and non-profit and for-profit entities prior to finalization and renewal.

The following staff at SNAP-Ed Toolkit Cooperative Agreement Partner University of North Carolina at Chapel Hill were involved in the update process:

1. Molly Demarco, Research Scientist – molly\_demarco@unc.edu
2. Tracy Wesley, Research Scientist – twesley@email.unc.edu
3. Claire Sadeghzadeh, Program Manager and Evaluator - jonsade@live.unc.edu
4. Justine Macfarlane, Research Assistant – justinem@live.unc.edu

In addition to the FNS Staff and cooperative agreement partners listed above, eight external stakeholders identified below consulted directly on this information collection. Suggestions to improve the form FNS-885 and FNS-886 were incorporated to improve the submission process.

The below individuals reviewed and provided comments on the revised FNS-885:

1. Kakul Joshi

PhD Candidate

Department of Population and Quantitative Health Sciences

Case Western Reserve University

Email: kxj106@case.du

1. Judith Dodd

University of Pittsburgh

Email: jdodd@pitt.edu

1. Jenna Seymour

Senior Policy Advisor

Division of Nutrition, Physical Activity, and Obesity

CDC

Email: jseymour1@cdc.gov

1. Marcy Kelly Scott

Vice President of Programs

Michigan Fitness Foundation

Email: mscott@michiganfitness.org

1. Deborah Young-Hyman, PhD

Health Scientist Administrator

Office of Behavioral and Social Science Research

NIH

Email: deborah.young-hyman@nih.gov

The below individuals pilot-tested and provided comments on the revised FNS-886 the pretesting estimates are included in the burden estimates:

1. Amanda S. Hege, MPH, RDN

Project Manager, Sustainable Food Systems

Academy of Nutrition and Dietetics Foundation

Email: ahege@eatright.org

1. Erin Croom

Co-Founder

Small Bites Adventure Club

Email: erin@smallbites.club

1. Staci K. Emm

Extension Educator

Mineral County Cooperative Extension, University of Nevada, Reno

Email: emms@unr.edu

# 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. This Information Collection was approved and cleared by the acting FNS Privacy Officer on June 29, 2021.

**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 are published. Prior to publishing, the respondent is asked to confirm contact information that they wish to be publicly shared. FNS staff use the individual contact information of respondents only to contact the respondent for necessary information, such as preferred organizational contact information. Only FNS staff have access to the respondents individual contact information and this information is not shared with others or posted online.

**Scoring Tool (FNS-885):** Scoring Tool (FNS-886) respondents do 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 may 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 is also 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) respondentcomments from the final three comment boxes on page five (5) of the Scoring Tool (FNS-885) are 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 are not provided with the names of associated Scoring Tool (FNS-885) respondents of their intervention upon request.

A Federal Register Notice was published on April 25, 1991 (56 FR Page19078 Volume Number 80) a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports. Names and phone numbers are not 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]](#footnote-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.**

There are a few topics people may consider sensitive in nature in this data collection; however, the 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 any individuals nor will individuals/households be ask to respond to this data collection or submit this form. This information is collected for the sole purpose of understanding the target audience for the interventions submitted and the educational topics covered.

#

# 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 institutions, and business or other for-profit institutions. The total number of respondents to this burden collection is estimated to be 190 annually, with a total of 231 annual responses, for total burden hours for this data collection estimated at 550 hours annually. This new estimation, based on recent reporting data, represents a decrease of 118 total burden hours compared to the initial estimate provided when this collection was submitted in 2018. This estimate also differs by 27 total burden hours from the estimate provided in the 60 day notice for this information collection. While small-scale pilot testing showed that the proposed revisions reduced burden, FNS has here chosen to use past completion data from a much larger sample in order to make a representative estimate. Since small-scale testing suggests the proposed revisions streamline the completion process, the FNS estimate here errs on the high side, and it is possible that real-world burden will be less than estimated below. Additional details of the pilot testing are available in Appendix 6 – Burden Narrative. 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.

**Scoring Tool (FNS-885) Burden Estimation:**

In 2019, 66 respondents completed the Scoring Tool (FNS-885). 20 respondents completed FNS-885 in 2020. For the Burden Table, the average number of respondents in 2019 and 2020 was used, or a total of 43 respondents. Responses reflected a larger number of respondents from non-profit businesses and a smaller number of respondents from State, local, and Tribal governments than initially expected, which is reflected in the Burden Table. Three respondents from non-profit businesses, and two respondents who are employees of the Federal government pilot-tested the revised FNS-885 and spent an average of two hours to complete the revised form. The three respondents from non-profit businesses are reflected in the Burden Table. The Burden Table for the Scoring Tool (FNS-885) reflects two hours for each completion of the form. Each respondent to FNS-885 also completes a one-hour training webinar, which has been included in the Burden Table. FNS predicts that the total annual burden hours for the Scoring Tool (FNS-885) will be 235 hours per year.

**Intervention Submission Form (FNS-886) Burden Estimation:**

In 2019, 75 respondents completed the FNS-886, or Intervention Submission Form. 22 respondents completed FNS-886 in 2020. For the Burden Table, the average number of respondents in 2019 and 2020 was used, or 49 total respondents. Responses reflected a larger number of respondents from non-profit businesses and a smaller number of respondents from State, local, and Tribal governments than initially expected, which is reflected in the Burden Table. Three respondents from non-profit businesses pilot-tested the revised FNS-886 and reported an average of six hours to complete the revised form. The Burden Table for the Intervention Submission Form (FNS-886) reflects six hours for each completion of the form. Each respondent to the FNS-886 also completes a one-hour training webinar, which has been included in the Burden Table. FNS predicts that the total annual burden hours for the Intervention Submission Form (FNS-886) will be 315 hours per year. The names, titles, and organizations of employment for pilot-testers the pretesting estimates are in section A12 of the Intervention Submission Form (FNS-886) are listed in section A8.

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

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Respondent Category** | **Type of Respondents**  | **CFR Citation** | **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 | 7 CFR 272.2(d)(2) | Intervention Submission Form | FNS-886 | 13 | 1 | 13 | 6 | 78.0 |
| 7 CFR 272.2(d)(2) | Intervention Submission Form (Training) | FNS-886 | 13 | 1 | 13 | 1 | 13.0 |
| 7 CFR 272.2(d)(2) | Scoring Tool | FNS-885 | 9 | 2 | 18 | 2 | 36.0 |
| 7 CFR 272.2(d)(2) | Scoring Tool (Training) | FNS-885 | 9 | 1 | 9 | 1 | 9.0 |
| **SUBTOTAL: State/Local/Tribal Government**    | 44 |   | 53 |   | 136.0 |
| Business, Non-Profit | Biological Sciences Teachers, Postsecondary | 7 CFR 272.2(d)(2) | Intervention Submission Form | FNS-886 | 29 | 1 | 29 | 6 | 174.0 |
| 7 CFR 272.2(d)(2) | Intervention Submission Form (Pretesting) | FNS-886 | 3 | 1 | 0 | 6 | 0.0 |
| 7 CFR 272.2(d)(2) | Intervention Submission Form (Training) | FNS-886 | 29 | 1 | 29 | 1 | 29.0 |
| 7 CFR 272.2(d)(2) | Scoring Tool | FNS-885 | 33 | 2 | 66 | 2 | 132.0 |
| 7 CFR 272.2(d)(2) | Scoring Tool (Pretesting) | FNS-885 | 3 | 1 | 0 | 2 | 0.0 |
| 7 CFR 272.2(d)(2) | Scoring Tool (Training) | FNS-885 | 33 | 1 | 33 | 1 | 33.0 |
| **SUBTOTAL: Business, Non-Profit**    | 130 |   | 157 |   | 368.0 |
| Business, Profit | Dietitians and Nutritionists | 7 CFR 272.2(d)(2) | Intervention Submission Form | FNS-886 | 3 | 1 | 3 | 6 | 18.0 |
| 7 CFR 272.2(d)(2) | Intervention Submission Form (Training) | FNS-886 | 3 | 1 | 3 | 1 | 3.0 |
| 7 CFR 272.2(d)(2) | Scoring Tool | FNS-885 | 5 | 2 | 10 | 2 | 20.0 |
|  | Scoring Tool (Training) | FNS-885 | 5 | 1 | 5 | 1 | 5.0 |
| **SUBTOTAL: Business, Profit**    | 16 |   | 21 |   | 46.0 |
| **GRAND TOTAL** | **190** | **1.2158** | **231** | **2.3810** | **550.0** |

**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. Fully loaded annual respondent cost prior to federal cost sharing is estimated at $27,605.59. While the Federal government reimburses allowable SNAP-Ed costs at 100%, it is difficult to estimate the Federal cost share for the purposes of this ICR. This difficulty stems from the large variance in the extent to which a respondent FTE may be funded by Federal SNAP-Ed funds; some respondent FTEs may not be funded at all (such as academics or for-profit employees), while other FTEs may have varying percentages of SNAP-Ed funding based on State agency allocations and other considerations. Based on the Bureau of Labor Statistics May 2020 Occupational and Wage Statistics – 29-1031 (https://www.bls.gov/oes/current/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 $30.84 per staff hour. Hourly mean wage for biological sciences teachers in postsecondary education institutions is $41.15 per staff hour based on the Bureau of Labor Statistics May 2020 Occupational and Wage Statistics – 25-1042 (<https://www.bls.gov/oes/current/oes251042.htm#(4))>, divided by an estimated 2,080 working hours per year. Costs are summarized in table B.12-1.

**Table B.12-1 Cost Summary**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **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** |
| FNS-886 | 13 | 1 | 13 | 6 | 78.0 | $30.84 | $2,405.52 |
| FNS-886 | 13 | 1 | 13 | 1 | 13.0 | $30.84 | $400.92 |
| FNS-885 | 9 | 2 | 18 | 2 | 36.0 | $30.84 | $1,110.24 |
| FNS-885 | 9 | 1 | 9 | 1 | 9.0 | $30.84 | $277.56 |
|   | 44 |   | 53 |   | 136.0 |   | $4,194.24 |
| FNS-886 | 29 | 1 | 29 | 6 | 174.0 | $41.15 | $7,160.10 |
| FNS-886 | 3 | 1 | 0 | 6 | 0.0 | $41.15 | $0.00 |
| FNS-886 | 29 | 1 | 29 | 1 | 29.0 | $41.15 | $1,193.35 |
| FNS-885 | 33 | 2 | 66 | 2 | 132.0 | $41.15 | $5,431.80 |
| FNS-885 | 3 | 1 | 0 | 2 | 0.0 | $41.15 | $0.00 |
| FNS-885 | 33 | 1 | 33 | 1 | 33.0 | $41.15 | $1,357.95 |
|   | 130 |   | 157 |   | 368.0 |   | $15,143.20 |
| FNS-886 | 3 | 1 | 3 | 6 | 18.0 | $30.84 | $555.12 |
| FNS-886 | 3 | 1 | 3 | 1 | 3.0 | $30.84 | $92.52 |
| FNS-885 | 5 | 2 | 10 | 2 | 20.0 | $30.84 | $616.80 |
| FNS-885 | 5 | 1 | 5 | 1 | 5.0 | $30.84 | $154.20 |
|   | 16 |   | 21 |   | 46.0 |   | $1,418.64 |
|  | **190** | **1.2158** | **231** | **2.3810** | **550.0** |   | **$19,954.24** |

# 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 $18,644.64 including fully-loaded wages. This includes cooperative agreement/contractor cost of $10,706 and fully-loaded Federal employee staff cost of $7,938.64.

This information collection assumes that a total of 244 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 loaded average hourly rate for the cooperative agreement partner staff performing this work is $43.88. The total cost for this work will be $10,706. $43.88 hourly rate x 244 hours = $10,706. Time estimate and hourly rates were calculated and provided to FNS by email on June 1, 2021. A full table of work tasks, hours, and costs from the cooperative agreement team at the University of North Carolina at Chapel Hill is available as Appendix 9.

Using the 2021 Federal General Schedule (GS) grade 13 step 05 (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/GS_h.aspx>), it is estimated that federal employees receiving an average wage take approximately 114 hours to complete this information collection. Using the same table for 2021 Federal General Schedule (GS) grade 14 step 06, it is estimated that Branch Chief and Senior Technical Staff review of this information collection will take an additional ten hours each. $40.50 x 114 hours = $4,919.10. $4,919.10 x .33 (fully loaded wages) = $6,542.40. $52.49 x 10 hours = $524.90. $524.90 x .33 (fully loaded wages) = $698.12. $698.12 x 2 staff = $1,396.24. $6,542.40 + 1,396.24 = $7,938.64.

**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 | $43.15 | $6,542.40 (includes 33% for fully loaded wages) |
| Branch Chief (GS 14 Step 6) | 1 | 10 | $52.49 | $698.12 (fully loaded wages) |
| Senior Technical Staff (GS 14 Step 6) | 1 | 10 | $52.49 | $698.12 (fully loaded wages) |
| Contractor Labor | 6 | 244 | $43.88 | $10,706 (fully loaded wages) |
| Total | 20 | 378 |  | $18,644.64 |

# 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 current inventory for this data collection is 127 respondents, 668 total annual burden hours and 160 total annual responses. There are 190 total annual respondents for this data collection this adjustment reflects an increase of 63 respondents. FNS is requesting 550 total annual burden hours and 231 total annual responses, an increase of 71 responses but a decrease of -118 total annual burden hours due to adjustments to the total number of respondents and program changes due to the modified instruments. These updated estimates have been developed based on data from real-world use of these forms, combined with reports from the pilot testing of the proposed revisions detailed in this information collection request.

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# 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 are 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 are 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 are 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  |
| 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.

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