**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-0639:**

**SNAP-Ed Intervention Scoring Tool FNS-885 and Intervention Submission Form FNS-886**

Divyani Pendleton, Nutritionist

Brenda Wolford, Nutritionist

Nutrition Education Branch

Program Administration and Nutrition Division

Supplemental Nutrition Assistance Program

USDA, Food and Nutrition Service

1320 Braddock Place

Alexandria, Virginia 22314

**Table of Contents**

[A1. Circumstances that make the collection of information necessary. 3](#_Toc170391128)

[A2. Purpose and Use of the Information. 4](#_Toc170391129)

[A3. Use of information technology and burden reduction. 8](#_Toc170391130)

[A4. Efforts to identify duplication. 9](#_Toc170391131)

[A5. Impacts on small businesses or other small entities. 9](#_Toc170391132)

[A6. Consequences of collecting the information less frequently. 10](#_Toc170391133)

[A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5. 11](#_Toc170391134)

[A8. Comments to the Federal Register Notice and efforts for consultation. 11](#_Toc170391135)

[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. 17](#_Toc170391136)

[A10. Assurances of confidentiality provided to respondents. 18](#_Toc170391137)

[A11. Justification for any questions of a sensitive nature. 18](#_Toc170391138)

[A12. Estimates of the hour burden of the collection of information. 18](#_Toc170391139)

[A13. Estimates of other total annual cost burden. 22](#_Toc170391140)

[A14. Provide estimates of annualized cost to the Federal government. 22](#_Toc170391141)

[A15. Explanation of program changes or adjustments. 23](#_Toc170391142)

[A16. Plans for tabulation, and publication and project time schedule. 24](#_Toc170391143)

[A17. Displaying the OMB Approval Expiration Date. 24](#_Toc170391144)

[A18. Exceptions to the certification statement identified in Item 19. 25](#_Toc170391145)

**Appendices**

Appendix A: Food and Nutrition Act (FNA), Section 28, as amended by the Agriculture Improvement Act of 2018 (7 U.S.C. 2036a)

Appendix B: 7 CFR 272.2(d)(2) – Nutrition Education Plan

Appendix C: FNS-886 Intervention Submission Form

Appendix C1: Intervention Submission Form Online Survey Screenshot

Appendix D: FNS-885 Intervention Scoring Tool

Appendix E: Excel Burden Estimate Table

Appendix F: Public Comment on Federal Register Notice

Appendix F1: Public Comment ASNNA

Appendix F1a: FNS Response to ASNNA

Appendix F2: Public Comment CalFresh Healthy Living Program

Appendix F2a: FNS Response to CalFresh Healthy Living Program

Appendix F3: Public Comment Susan Foerster

Appendix F3a: FNS Response to Susan Foerster

# 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. Section 28 of the Food and Nutrition Act (FNA) of 2008, as amended (7 U.S.C. 2036a), states that “The Secretary shall establish an online clearinghouse that makes available to State agencies, local agencies, institutions of higher education, and community organizations, best practices for planning, implementing, and evaluating nutrition education and obesity prevention services to ensure that projects carried out with funds received under this section are appropriate for the target population.” (Appendix A). 7 CFR 272.2(d)(2)(vii)(D) states “SNAP-Ed activities must include evidence-based activities using two 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 and physical activity.” (Appendix B).

The *SNAP-Ed Strategies and Interventions: An Obesity Prevention Toolkit for States* (SNAP-Ed 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). The SNAP-Ed Toolkit website and resources were recently moved to the SNAP-Ed Connection website to establish SNAP-Ed’s online Clearinghouse, which includes evidence-based SNAP-Ed interventions. State agencies can use the evidence-based interventions in the SNAP-Ed Clearinghouse (formerly the SNAP-Ed Toolkit) to locate interventions for their implementation of SNAP-Ed programming. Currently, more than 150 interventions are available on the website <https://snaped.fns.usda.gov/>.

The SNAP-Ed Intervention Submission Form, FNS-886 (Appendix C), and the SNAP-Ed Intervention Scoring Tool, FNS-885 (Appendix D), provide a uniform and transparent method for submission, review, and scoring of nutrition education, physical activity promotion, and obesity prevention interventions for inclusion in the SNAP-Ed Clearinghouse. SNAP-Ed State and implementing agencies, nutrition education and public health agencies, and other organizations use these voluntary forms to submit interventions for consideration. The SNAP-Ed Intervention Submission Form and Scoring Tool allows SNAP-Ed implementers and the review committee to determine if the intervention submitted for the SNAP-Ed Clearinghouse is evidence-based and uses one or more of the required approaches. These forms support FNS efforts to increase the selection of interventions available in the SNAP-Ed Clearinghouse, improve innovation in service delivery using interventions which reflect the latest research, and respond directly to agencies submitting interventions (submitters) for the SNAP-Ed Clearinghouse.

# 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.**

Intervention submitters use the SNAP-Ed Intervention Submission Form, FNS-886, to provide information about the intervention they are submitting for inclusion in the SNAP-Ed Clearinghouse. This information includes intervention materials (such as materials used to develop and test the intervention, evaluation materials, or reports), the intended audience, and the evidence base which illustrates their effectiveness. The FNS-886 captures this information through a combination of multiple-choice boxes and text response areas.

Submitters include members of SNAP-Ed State and implementing agencies, researchers from academic institutions and Federal agencies, and non-profit or private sector nutrition education and physical activity intervention developers.

FNS collects the SNAP-Ed Intervention Submission Forms and attachments and provides them to intervention reviewers. Reviewers include FNS staff, staff from other Federal agencies, such as the Centers for Disease Control and Prevention (CDC), researchers from academic institutions, and SNAP-Ed State and implementing agency staff. They use the FNS-885 to assess and rate each submission. The reviewers’ assessments are collected through a combination of numerical and text entry fields.

FNS will accept interventions to the SNAP-Ed Clearinghouse in FY 2025. The intervention submission and review period occurs biennially.

FNS updated the forms and burden estimates based on consultations with SNAP-Ed State and implementing agency partners, other Federal agencies, and users of the forms. FNS has refined and streamlined the forms, and included additional instructions, questions, or opportunities for response where users, trainers, and FNS partners indicated areas for improvement. FNS has also made wording changes to fix typographical errors and improve readability. Overall, the changes to the forms are focused on form improvements for the end user.

The following updates were made to the FNS-886:

1. Renamed section headers as follows:

a. Changed Section I from *Intervention Name, Contact Information, and Cost* to *Intervention Name and Contact Information*.

b. Changed Section III from *Reach* to *Intervention Development.*

c. Changed Section IV from *Effectiveness* to *Evaluation and Outcomes.*

d. Changed Section V from *Adoption* to *Implementation.*

e. Changed Section VI from *Implementation* to *Training, Materials, and Resources*.

f. Changed Section VII from *Maintenance* to *Intervention Attachments*.

g. Changed Section VIII from *Intervention Attachments* to *Evaluation Attachments.*

2. Restructured, added, and edited wording as follows:

a. Renumbered questions due to the insertion and removal of questions throughout. Spelled out all acronyms the first time they are mentioned in the text (such as Policy, Systems, and Environmental Changes), followed by the acronym in parentheses.

b. In Section I, *Intervention Name and Contact Information*, moved three questions (10, 11, and 12) related to costs and materials to Section VI, *Training, Materials and Resources*.

c. In Section II, *Intervention Overview*, changed “intervention approach” to “intervention strategies” and removed “Breastfeeding” and “Food Insecurity” and added “Food Resource Management” as a Target Behavior category. Aligned race and ethnicity categories with those included in the National Program Evaluation and Reporting System (N-PEARS). Added additional age and population groups, including people with intellectual and developmental disabilities, refugees/asylees and immigrants, and veterans.

Moved question 35 on core intervention components under Section II. Moved questions 15 and 16 on evidence-based approach and type of evaluation conducted to Section IV, *Evaluation and Outcomes*. Moved question 18 on intervention materials available to Section VI.

d. In Section III, *Intervention Development*, changed “target audience” to “intended audience.” Moved questions 22-24 to this section.

e. In Section IV, *Evaluation and Outcomes*, removed the “emerging” option for evidence-based approaches, added a new question on behavior change theories used in the development of the intervention, and added a new question asking submitters to identify tools they used to evaluate their intervention. Moved questions 15, 16, and 25 to this section*.*

f. In Section V, *Implementation*, changed “target audience” to “intended audience.” Clarified question 41 on adaptations or modifications made to the intervention by removing language about process evaluation and adding a new sub-question to ask about feasibility of adapting the intervention to other settings/communities. Clarified question 43 on sustainability by asking how the intervention will be sustained in the future. Moved questions 29 and 30 on primary settings of the intervention to this section*.*

g. In Section VI, *Training, Materials, and Resources,* clarified training that is required to implement the intervention.

h. In Section VII, *Intervention Attachments*, added instructions to clarify that submitters should describe how evaluation and modification addressed intervention sustainability concerns.

i. In Section VIII, *Evaluation Attachments,* added instructions to help submitters name and reference their attachments throughout the submission form.

The following changes were made to the FNS-885:

1. Updated and clarified instructions.

2. Renamed section headers as follows:

a. Changed Section I from *Reach* to *Intervention Overview and Development*.

b. Changed Section II from *Effectiveness* to *Evaluation and Outcomes.*

c.Changed Section III from *‘Were the required activities of your intervention successfully implemented?’* to *Implementation.*

d. Changed Section IV from *Maintenance* to *Training, Materials and Resources*.

3. Changed “target audience” to “intended audience” throughout.

4. Restructured, formatted, added, and edited wording as follows:

a. Restructured all sections to align with the changes to FNS-886.

b. In Section I, *Intervention Overview and Development*, added three questions on (1) the intervention’s ability to address the needs of the intended audience, (2) the intended audience and community partner involvement in the intervention development, and (3) SNAP-Ed educators, participant, and/or partner involvement in testing the acceptability of the intervention.

c. In Section II, *Evaluation and Outcomes*, removed “emerging” as an evidence-based category from the scoring tool, added a question on the use of behavior change theories in the intervention development, and clarified the scoring of intended outcomes and alignment with the SNAP-Ed Evaluation Framework.

d. In Section III, *Implementation*, made minor wording clarifications across questions, and added a question on adaptability of the interventions.

e. In Section IV, *Training, Materials and Resources*, edited questions for clarity and removed one question on interventions adopted by partners in settings not directly supported by SNAP-Ed.

f. In the Bonus Questions, changed reference of the *SNAP-Ed Toolkit* to the *Clearinghouse of Evidence-Based Interventions* and updated the list of populations and settings that are currently underrepresented in the SNAP-Ed Clearinghouse. Added “multi-sector initiatives” to the list of underrepresented interventions in bonus question #2.

# 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 makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. Currently, SNAP-Ed personnel, nutrition education intervention developers, and other interested parties submit intervention materials to FNS electronically using an externally managed online survey platform (a link to the survey is not yet available; however, see Appendix C1 for a screenshot of the survey introduction). The former SNAP-Ed Toolkit website was recently moved to the SNAP-Ed Connection website to establish SNAP-Ed’s online Clearinghouse. Going forward, respondents will access the FNS-886 (Appendix C) via a link to an internally managed online survey platform available on the SNAP-Ed Connection website (Appendix C1), and reviewers will complete the FNS-885 using a Microsoft Excel file (Appendix D) and submit to FNS via email.

FNS decreased the estimated total annual burden from 550 hours to 320 hours based on historical submission data and the expectation that partners may submit fewer interventions to the SNAP-Ed Clearinghouse on a biennial basis (Appendix E). FNS further reduced burden by refining and streamlining questions in the FNS-885 and FNS-886 and enhancing the FNS-885 scoring tool for ease of the user. FNS included additional instructions, questions, or opportunities for response where users, trainers, and FNS partners indicated areas for improvement in both forms. FNS also made wording changes to fix typographical errors and improve readability. Overall, the changes to the forms are focused on form improvements for the end user. The information collected is submitted 100% electronically.

# 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 information collection. 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. FNS monitors State performance to ensure that the Program is being efficiently and economically operated.

# 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.**

Information being requested has been held to the minimum required for the intended use. The impact to small businesses and other small entities should be minimal, due to the voluntary nature of this data collection. FNS anticipates most respondents are State SNAP-Ed agencies and members of collegiate academic institutions that develop SNAP-Ed-related interventions. Smaller SNAP-Ed entities (e.g., SNAP-Ed implementing agencies) or affiliated agencies may be involved in this data collection (to the extent that States engage with small not-for-profit and for-profit institutions to deliver SNAP-Ed activities). These entities provide similar activities and functions as larger SNAP-Ed entities and are therefore able to complete this form without modifications.

The potential respondent types include State, local, and Tribal Governments (37), Not-For-Profit and For-Profit Businesses (10), and For-Profit Organizations (3). FNS estimates that 3 of the 50 total respondents or approximately 6 percent (3 divided by 50), are small entities.

#

# 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. Respondents may voluntarily complete the FNS-886 and FNS-885 and submit materials on a biennial basis, thus providing flexibility and reducing burden. This also allows respondents to share up-to-date evidence-based SNAP-Ed-interventions for adoption by other SNAP-Ed Programs and providers.

Failure to collect this information would inhibit FNS from meeting the FNA requirement to have a Clearinghouse that makes resources and best practices available to SNAP-Ed implementers.[[1]](#footnote-3) Without the ability to easily share interventions and Program outcomes, agencies may duplicate existing materials.

# 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 60-day notice was published in the Federal Register on February 2, 2024 (89 FR 7356). The public comment period ended on April 2, 2024. FNS received 4 comments, three that related to the information collection (see Appendix F).

The comments that pertained to the FNS-886 focused primarily on retaining elements of the current form, such as the “emerging” category for describing the type of evidence-based approach, the alignment of section headers with the *Reach Effectiveness Adoption Implementation Maintenance* (RE-AIM) Framework, and the food assistance category for intervention target behaviors. Comments that pertained to the FNS-885 focused primarily on aligning with the proposed changes for FNS-886, opposing the removal of the “emerging” category for evidence-based approaches, and providing additional considerations for reaching smaller, historically underserved groups and settings. Summaries of these comments are shown below along with FNS’ responses.

**RE-AIM headers**:

One commenter encouraged FNS to continue to align section headers with the RE-AIM Framework in both the FNS-885 and FNS-886. While FNS encourages States to apply the RE-AIM framework when selecting SNAP-Ed interventions, for the ease of completing this form, FNS is using headings that clearly describe what is being requested in each section.

**Removal of the “emerging” category**:

Commenters encouraged FNS to retain the “emerging” category for describing the type of evidence-based approach in both the FNS-885 and FNS-886. FNS agrees with the commenters that “emerging” is a vital category along the continuum of evidence-based strategies and interventions. Per 7 CFR §272.2(d)(2)(vii)(B), emerging strategies or interventions are community- or practitioner-driven activities that have the potential for obesity prevention but have not yet been formally evaluated for obesity prevention outcomes. Because “emerging” strategies or interventions have not yet been evaluated for effectiveness, they will no longer be included in SNAP-Ed’s Clearinghouse of Evidence-Based Interventions. States and implementing agencies may continue to submit “emerging” interventions in their annual SNAP-Ed State plans as “Other Previously Developed Interventions" or "New Interventions," with the goal of evaluating these interventions for potential future submission to SNAP-Ed’s Clearinghouse of Evidence-Based Interventions.

**Intervention Strategies**:

In the FNS-886, commenters recommended adding multi-sector partnerships as an intervention strategy. Coordination and partnership with programs and organizations from multiple sectors is an important indicator of work at the Sectors of Influence level of the SNAP-Ed Evaluation Framework, and FNS encourages States to implement and evaluate multisector partnerships. However, on its own, multi-sector partnerships are not considered a SNAP-Ed intervention strategy.

**Target behaviors**:

While commenters were in favor of adding food resource management as a new category for target behaviors in the FNS-886, they recommended retaining a separate category for food assistance use. FNS believes a category for food assistance use is not needed because food resource management encompasses broader target behaviors that would address food assistance use. According to the [SNAP-Ed Evaluation Framework and Interpretive Guide](https://snaped.fns.usda.gov/administration/evaluation-framework), “food resource management is the handling of all foods, and resources that may be used to acquire foods, by an individual or family.” Additionally, food resource management is among the core indicators of change in the SNAP-Ed Evaluation Framework.

**Modification of Interventions**:

One commenter recommended modifying FNS-886 question 41 to ask about feasibility of adapting the intervention to other settings or communities. FNS agrees with this recommendation and added a separate question on adapting to other settings/communities.

**Reach of underserved groups**:

One commenter recommended adjusting scoring criteria to award more points to interventions that reach smaller, chronically underserved groups and settings. FNS agrees with this comment and addressed it in the bonus section.

**Behavior Change Theory**:

One commenter inquired about the inclusion of a question on behavior change theory described in the FNS-885 and advised against including it in the FNS-886. FNS included a question on behavior change theory due to the need to evaluate interventions for their evidence-base. Behavior change theory is an important component that can help guide the development, implementation, and evaluation of SNAP-Ed interventions.

**Include a question on “adaptability”**:

One commenter suggested adding a question on adaptability of the intervention in the FNS-886 and to clarify scoring criteria in the FNS-885. FNS agrees with this comment and incorporated a question on adaptability of the intervention in the FNS-886 (question 32 b) and clarified scoring criteria in the FNS-885.

**Sustainability**:

One commenter voiced concern about the addition of a question on sustainability in the FNS-885 indicating that the sustainability standard would not be assessed consistently and equitably. FNS will retain the question on sustainability as it is an important component of SNAP-Ed interventions. FNS adjusted the question in the FNS-886 to help ensure consistent and equitable scoring.

**Bonus questions**:

One commenter encouraged FNS to adjust the bonus questions in the FNS-885 to help fill gaps in evidence-based interventions for under-represented populations and settings and under-represented outcomes in the SNAP-Ed Evaluation Framework; to align with the five pillars in the National Strategy on Hunger, Nutrition, and Health; and to address high priority geographic areas, such as rural and Tribal communities. FNS agrees and has included some of this suggested language in the bonus questions.

**General Feedback:**

Commenters suggested aligning with SNAP-Ed’s National Program Evaluation and Reporting System (N-PEARS), using inclusive language throughout (e.g., replace the word “target audience” with “intended audience”), and emphasizing reach of underserved groups. FNS agrees with these recommendations and adjusted the FNS-886 and FNS-885.

FNS’ responses to the germane comments are provided in Appendix F. FNS thanks all commenters for their suggestions and feedback.

Consultations with SNAP-Ed Affiliated Representatives

FNS requested feedback on the forms from nine SNAP-Ed affiliated representatives that submitted interventions to the SNAP-Ed Clearinghouse or have an interest in such resources. These nine SNAP-Ed affiliated representatives provided feedback on the content, clarity and burden estimate of this information collection. FNS held a meeting with the consultation group on September 13, 2023, prior to submitting the FNS-885 and FNS-886 forms for 60-day notice and comment. FNS updated the forms based on the comments and edits from the consultation group.

The individuals and organizations consulted about the information collection are listed in Table A.8.

**Table A.8 Non-Federal Consultation Group**

| **Contact** | **Organization** | **Email** |
| --- | --- | --- |
| Jean B. | University of Hawaii (SNAP-Ed implementing agency (IA)) | jbutel@hawaii.edu |
| Jennie Q. | University of Colorado, School of Public Health (SNAP-Ed IA) | jennie.quinlan@cuanschutz.edu |
| Suzanne K. | Vermont Department of Health | suzanne.kelley@vermont.gov |
| Tracy D. | University of North Carolina at Chapel Hill | twesley@email.unc.edu  |
| Kamaljeet K. | University of California Davis | kjkhaira@ucdavis.edu |
| Laurel J. | University of Arizona | jacobsl@arizona.edu |
| Lauren S. | South Dakota State University | Lauren.Sweeney@sdstate.edu  |
| Elena S. | Virginia Polytechnic Institute and State University | serrano@vt.edu |
| Hyunjun K. | Association of SNAP Nutrition Education Administrators (ASNNA)  | info@asnna.us.org |

Based on feedback provided by these representatives, FNS has refined and streamlined the forms and included additional instructions, questions, or opportunities for response. In addition, FNS updated the forms and burden estimates based on consultations with SNAP-Ed State and implementing agency partners, other Federal agencies, and users of the form.

# 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 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. No confidential information is associated with this collection of information. This information collection request was reviewed and cleared by FNS Privacy Officer, Deea Coleman, on September 4, 2024.

# 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 no questions of a sensitive nature included in this information collection. This information collection request was reviewed and cleared by FNS Privacy Officer, Deea Coleman, on September 4, 2024.

# 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 estimated burden for this information collection including the number of respondents, frequency of response, average time to respond, and annual hour burden are shown in the attached Burden Table (Appendix E). A summary of the burden appears in Table A.12-1 Summary of Burden Hours and Costs.

*Number of Respondents*

The estimated number of respondents is 50. The estimated number of respondents for the FNS-886 is 28 respondents (22 State/Local/Tribal Government, 5 non-profit organizations, and 1 for-profit organization). The estimated number of respondents for the FNS-885 is 22 respondents (15 State/Local/Tribal Government, 5 non-profit organizations, and 2 for-profit organizations). This estimate is a decrease based on historical submission data.

*Frequency of Response*

The revised total annual responses is 94, which is a reduction to the current estimated total annual responses of 231 responses. This estimate is a decrease based on historical submission data. The estimated number of responses per respondent is 1.88 responses, based on the estimate of 94 responses from 50 respondents. For the FNS-886, FNS expects to receive one response from each respondent. For the FNS-885, FNS expects to receive two responses and one required training from each respondent. This estimate is unchanged from the previous OMB approval.

*Annual Hour Burden*

The revised estimated time per response for this voluntary collection is 5.5 hours for the FNS-886, 3 hours for the FNS-885, and 1.5 hours for training and receiving access to the FNS-885 (Appendix E). FNS calculated this estimate based on feedback from the consultation group. FNS used an average estimate based on this feedback; any data outliers were not included in this estimate. This reflects an increase from the current estimate of 2 hours for the FNS-886 and a decrease from the current estimate of 6 hours for the FNS-885.

The revised estimated total burden on respondents for this voluntary collection is 320 hours. This revised estimate is a reduction from the current estimated total annual burden of 550 hours. This revised estimate is a decrease based on historical submission data.

There are no recordkeeping or third-party/disclosure requirements associated with this information collection.

**Table A.12-1 Summary of Burden Hours and Costs**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Respondent Category** | **Burden Activity** | **Form** | **Estimated Number of Respondents** | **Responses per Respondent** | **Total Annual Responses** | **Estimated Hours per Response** | **Estimated Total Burden Hours** | **Base Hourly Wage Rate** | **Fully-Loaded Wage Rate** | **Total Annualized Cost of Respondent Burden** |
| State/ Local/ Tribal Government | Completing intervention submission form | FNS-886 | 22 | 1 | 22 | 5.5 | 121.0 | $34.27 | $45.58 | $5,515.07 |
| Completing intervention scoring tool | FNS-885 | 15 | 2 | 30 | 3 | 90.0 | $34.27 | $45.58 | $4,102.12 |
| Scoring Tool (training/access) | FNS-885 | 15 | 1 | 15 | 1.5 | 22.5 | $34.27 | $45.58 | $1,025.53 |
| **SUBTOTAL: State /Local/ Tribal Government** |   |   | **37** |   | **67** |   | **233.5** |   |   | **$10,642.72** |
| Business, Non-Profit | Intervention Submission Form | FNS-886 | 5 | 1 | 5 | 5.5 | 27.5 | $49.17 | $65.40 | $1,798.39 |
| Scoring Tool | FNS-885 | 5 | 2 | 10 | 3 | 30.0 | $49.17 | $65.40 | $1,961.88 |
| Scoring Tool (training/access) | FNS-885 | 5 | 1 | 5 | 1.5 | 7.5 | $49.17 | $65.40 | $490.47 |
| **SUBTOTAL: Business, Non-Profit** |   |   | **10** |  | **20** |  | **65.0** |  |  | **$4,250.75** |
| Business, Profit | Intervention Submission Form | FNS-886 | 1 | 1 | 1 | 5.5 | 5.5 | $34.27 | $45.58 | $250.69 |
| Scoring Tool | FNS-885 | 2 | 2 | 4 | 3 | 12.0 | $34.27 | $45.58 | $546.95 |
| Scoring Tool (training/access) | FNS-885 | 2 | 1 | 2 | 1.5 | 3.0 | $34.27 | $45.58 | $136.74 |
| **SUBTOTAL: Business, Profit** |   |   | **3** |  | **7** |  | **20.5** |  |  | **$934.37** |
| **TOTAL** |  |  | **50** | **1.8800** | **94** | **3.3936** | **320** |   |   | **$15,827.84** |

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

The total annual cost to respondents is $15,827.84, which includes fully loaded wages (see *Total Annual Cost of Respondent Burden* in Table A.12-1 above). The information collection requirements described herein are imposed on State, local and Tribal Governments, and Not-For-Profit and For-Profit Businesses. A summary of the of annualized cost to respondents appears in Table A.12-2 Summary of Labor Rates.

In determining the public burden costs associated with this voluntary collection, FNS used Bureau of Labor and Statistics (BLS) Occupational Employment Statistics estimates. For State/Local/Tribal Government (SNAP-Ed State and implementing agency Dietitians and Nutritionists) and For-Profit Organizations (Dietitians and Nutritionists), FNS used the mean hourly wage rates for BLS Occupation Code 29-1031, Dietitians and Nutritionists (<https://www.bls.gov/oes/current/oes291031.htm>). Based on the most recent Occupational Employment and Wage Estimates from May 2023, this category of workers earns a mean hourly wage of $34.27 and a fully loaded wage of $45.58 (FNS used 33 percent of the base hourly wage rate to calculate fully loaded wages). Because SNAP-Ed is a 100 percent Federally funded Program, there are no reimbursed costs to the State, local or Tribal agencies.

For Non-Profit Organizations, FNS used the mean hourly wage rates for BLS Occupation Code 25-1042 Biological Science Teachers, Postsecondary (<https://www.bls.gov/oes/current/oes251042.htm#(4)>). Based on the most recent Occupational Employment and Wage Estimates from May 2023, this category of workers earns a mean annual wage of $102,270. FNS divided the mean annual wage by 2080 hours to arrive at the mean hourly wage of $49.17 and a fully loaded wage of $65.40 (FNS used 33 percent of the base hourly wage rate to calculate fully loaded wages).

**Table A.12-2 Summary of Labor Rates**

|  |
| --- |
| **FNS SNAP-Ed Connection Resource Sharing Form ICR Labor Rates (OMB Control No. 0584-0639)** |
| **Type of Respondent** | **Estimate in Currently Approved ICR** | **Updated Estimate** |
| **Number** | **Data Source** |
| State/Local/Tribal Government | $30.33 | $34.27  | Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data from May 2023; Mean Hourly Wage Rate for Dietitians and Nutritionists = $34.27. Available at https://www.bls.gov/oes/current/oes291031.htm. We have multiplied this wage rate by 1.33 to represent fully loaded wages. Because SNAP-Ed is a 100% Federally funded program, there is no reimbursed cost to the State, Local or Tribal agencies. |
| Business-for-not-for-profit | $30.33 | $49.17  | Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data from May 2023; Mean Hourly Wage Rate for Biological Science Teachers, Postsecondary = $49.17. Available at https://www.bls.gov/oes/current/oes251042.htm#(4). We have multiplied this wage rate by 1.33 to represent fully loaded wages. 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 cost component or ongoing operation, or 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 $33,898.05. This cost includes the fully loaded Federal wages associated with hours to review intervention submissions. A summary of the annualized cost to the Federal government appears in Table A.14-1, Summary of Cost to the Federal Government.

FNS estimates that two SNAP Nutritionists, GS grade 13 step 2 ($51.20/hour) will take approximately 470 hours (5 hours per each of the estimated 94 responses), to analyze data received from this information collection totaling $24,064 ($51.20 multiplied by 470 hours). The fully loaded wage inclusive of fringe benefits (x 1.33) is $32,007.00 ($68.10 multiplied by 470). FNS estimates the SNAP Nutrition Education Branch Chief, General Schedule (GS) grade 14 step 2 ($60.50/hour) will take approximately 23.5 hours (0.25 hours per each of the estimated 94 responses) to analyze data received from this information collection totaling $1,421.75. The fully loaded wage inclusive of fringe benefits (x 1.33) is $1,891.05 ($80.47 x 23.5). Thus, the total estimated annual cost to the Federal government for Federal employees’ time spent on this information collection is $33,898.05. The data used for all salary and cost calculations can be found at [Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx).

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

|  |
| --- |
| **FNS SNAP-Ed Connection Resource Sharing Form ICR Federal Gov't Cost (OMB Control No. 0584-0639)** |
| **Source of Cost** | **Number of Respondents** | **Number of Hours** | **Total 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 2) | 2 | 235 | 470 | $51.20  | $24,064  | $68.10  | $32,007.00  |
| Federal Employees (GS grade 14, step 2) Branch Chief | 1 | 23.5 | 23.5 | $60.50 | $1,421.75  | $80.47  | $1,891.05  |
| Subtotal Cost for Federal Gov't w/ Fringe Benefits  | $33,898.05 |
| Grant Total Annual Cost for Federal and Contractor Cost | $33,898.05 |

# 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 previously approved information collection. This revision reflects an overall lower annual burden estimate of 320 hours, which is a decrease from the current estimate of 550 hours.

This revised collection is estimated to receive a total of 94 responses per year, which is a decrease from the current estimate of 550 responses. This estimate is a decrease based on historical submission data and the expectation that fewer interventions may be submitted to the SNAP-Ed Toolkit on a biennial basis.

The estimated time per response for this voluntary collection is 5.5 hours for the FNS-886, 3 hours for the FNS-885, and 1.5 hours for training and receiving access to FNS-885. This reflects an increase from the current estimate of 2 hours for the FNS-886 and a decrease from the current estimate of 6 hours for the FNS-885. FNS calculated this estimate based on feedback from the consultation group.

# 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.**

This collection does not employ statistical use and there are no plans to publish the results of this collection for statistical analyses.

# 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.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

# 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. The Secretary shall establish an online clearinghouse that makes available to State agencies, local agencies, institutions of higher education, and community organizations best practices for planning, implementing, and evaluating nutrition education and obesity prevention services to ensure that projects carried out with funds received under this section are appropriate for the target population. 7 U.S.C. 2036a(c)(6). [↑](#footnote-ref-3)