

Supporting Statement for
Uniform Grant Application for Non-Entitlement Discretionary Grants
(OMB Control Number 0584-0512)

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1. Explain the circumstances that make the collection of information necessary.

The Food and Nutrition Service (FNS) has a number of non-entitlement discretionary grant programs. The term “grant” in this submission refers only to non-entitlement discretionary grants or cooperative agreements. Discretionary grant announcements include a number of information collections, including a “project description” (program narrative), budget information, and an anti-lobbying certification. An optional survey form may also be included for the purpose of helping the Federal government determine the organizational nature of the applicant population, specifically when dealing with Non-Profit organizations. The budgetary information, the anti-lobbying and the optional survey forms are pre-approved by the Office of Management and Budget (OMB) and therefore, do not require a separate approval.

The information collection is a revision of a currently approved package for all non-entitlement discretionary grant programs to collect information from grant applicants. This information is needed to evaluate and rank applicants and protect the integrity of the grantee selection process. All FNS discretionary grant programs would be eligible, but not required, to use this uniform grant application package. If FNS decides to use the uniform grant application package, FNS will note in the grant solicitation that applicants must use the uniform grant application package and that the information collection has already been approved by OMB. If FNS decides not to use the uniform grant application package or determines that it needs grant applicants to provide additional information not contained in the uniform package, then FNS will publish a notice soliciting comments on its proposal to collect different or additional information before making the grant solicitation.

The uniform grant application package will include: general information and instructions; requirements for the program narrative statement describing how the grant objectives will be reached as well as a description of the budget; the Standard Form, SF-424 series, that requests basic information, budget information, anti-lobbying certification, and the optional survey form to ensure equal opportunity for applicants. The proposed information collection covered in this request is related to the requirements for the program narrative statement which is described in section 1c(5) of OMB Circular A-102 and OMB Circular A-110 (as implemented at USDA 7CFR Parts 3015, 3016, and 3019), and will apply to all types of grantees-States and local governments, Indian Tribal Organizations, Non-Profit organizations, For-Profit organizations, and Institutions of Higher Education. The information collection burdens related to the SF-424 series of forms, the anti-lobbying certification and the optional survey form to ensure equal opportunity for applicants have been separately approved by OMB.

The authorities for these grants vary. The legal or administrative authorities for the potential programs requesting use of this uniform grant application package are listed below:

Annual Competitive Grants/Cooperative Agreements	Program Authorization
Team Nutrition Training Grants	Child Nutrition Act 1996 [42 U.S.C. 1771 19(d)(1)]
WIC Electronic Benefits Transfer Grants	Child Nutrition Act of 1996 [42 U.S.C. 1771 17(h)(10)(B)]
WIC Infrastructure Grants	Child Nutrition Act of 1966 [42 U.S.C. 1771 17(h)(10)(B)]
WIC Special Project Grants	Child Nutrition Act of 1996 [42 U.S.C. 1771 17(h)(10)(B)]
Food Stamp Obesity Grants	Food, Conservation, and Energy Act of 2008 Section 4141
Food Stamp Program Outreach Grants	Section 17 of the Food Stamp Act (7 U.S.C. 2011 <i>et seq.</i>)
Food Stamp Program Participation Grants	Farm Security and Rural Investment Act of 2002 (Public Law 107-171)

Child Nutrition Program Direct Certification & Verification Grants	Child Nutrition and WIC Reauthorization Act of 2004 Public Law 108-265
Child Nutrition Program Administrative Review and Training Grants	Child Nutrition and WIC Reauthorization Act of 2004 Public Law 108-265

2. Purpose and Use of the Information.

The primary users of the information collected from the applicants are FNS staff that review, evaluate and approve grant and cooperative agreement applications and recommend the applicants most likely to meet program objectives.

3. Use of Information Technology and Burden Reduction.

FNS permits respondents and grantees to receive and provide information electronically at their option in accordance with the E-Grants Initiative, a part of the President’s Management Agenda, using the Grants.gov website. Grants.gov is a Federal government-wide website portal for the announcement of Federal funding opportunities and the receipt and disbursement of applications from interested parties to these opportunities to the applicable Federal agency. This web site was developed as part of the Federal Financial Assistance Management Improvement Act of 1999 (P.L. 106-107). Potential respondents will be able to learn about and receive the application package as well as apply on-line by accessing the www.grants.gov. FNS will also continue to allow respondents to download the application from the FNS web site or by contacting FNS and requesting a hard copy by mail. Eligible entities are mailed grant application packages directly.

4. Describe Efforts to Identify Duplication and Use of Similar.

There are no similar data collection efforts.

5. Impact on Small Businesses or Other Small Entities.

The information requested is held to the minimum amount required to meet program requirements. FNS collects the information required to evaluate these unique program criteria.

6. Consequence for conducting this Information Less Frequently.

If the information is not collected, the programs will not have adequate data to select appropriate grantees or evaluate which grants should be continued. FNS will seek minimal information that will be critical in selecting the most promising grantees. Reduced frequency is not possible as the annual frequency of applications coincides with the annual appropriation of funds.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.6.

There are no special circumstances that require the collection to be conducted in the manner stated above.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.

A notice was placed in the Federal Register on August 20, 2008, (Volume 73, Number 162, page 49159-49160) soliciting comments on FNS's intent to request OMB approval for a uniform grant application package for FNS discretionary grant programs. FNS received one public comment in response to the Federal Register notice where online details on FNS grant recipients, grant purpose, accomplishments and period of performance were requested by the writer. FNS prepared a written response to the commenting party.

FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings. For example, FNS staff

discussed the WIC Special Grants application process at the National Association of WIC Directors' May 2008. Grants Management staff have discussed the EBT grant application with potential applicants at various regional EBT meetings.

9. Explain Any Payment or Gift to Respondents.

There are no plans to provide payment or gifts to respondents.

10. Assurance of Confidentially Provided to Respondents.

FNS is requesting the information called for in this application package pursuant to its statutory authority to award grants. Provision of the information requested is entirely voluntary. The collection of this information is for the purpose of aiding in the review of applicants prior to grant award decisions and for management of grants. No personal identifiable information is requested from potential applicants. This information will be used within FNS and may also be disclosed outside of FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act.

11. Justification for Sensitive Questions.

There are no questions of a sensitive nature included in the uniform grant application package for discretionary grant programs.

12. Estimates of the hour burden Including Annualized Hourly Costs.

The table below provides estimates of number grants/cooperative agreements expected in FY-2008, the estimate time required to complete the application (program narrative statements) and the estimated total

burden hours for each type of annual competitive grant/cooperative agreements. These estimates reflect numbers of grant/cooperative agreement applications received in the past and the average length of the applications submitted.

The total annual estimated burden is 31,340 hours based on an estimated 572 application submissions taking between 20 to 80 hours to complete depending on the specific grant/cooperative agreement applications in table A.12-1 Estimates of Burden Hours.

A.12-1 Estimates of Burden Hours

Annual Competitive Grants/Cooperative Agreements (CA)

Type of Respondent	Type of Instrument/Grant Application Used	Est. no. of Grant/CA Applications (Responses)	Est. Time (hours) to complete each Application*	Total Estimated Burden Hours
Grantees	Team Nutrition Training Grants	30	40.00	1,200.00
	Child Nutrition Administrative Review and Training	5	60.00	300.00
	Child Nutrition Direct Certification and Verification	8	60.00	480.00
	WIC EBT Competitive Grants	6	40.00	240.00
	WIC EBT Limited Grants	5	40.00	200.00
	WIC Infrastructure Grants	60	40.00	2,400.00
	WIC Special Project Grants (<i>Full Applications</i>)	6	80.00	480.00
	WIC Special Project Grants (<i>Concept Only</i>)	2	20.00	40.00
	Food Stamp - Outreach Grants	300	60.00	18,000.00
	Food Stamp - Participation Grants	20	60.00	1,200.00
	Food Stamp Obesity Grants - 2008 Farm Bill	30	60.00	1,800.00
	Miscellaneous Grants Expected to be authorized by Congress	100	50.00	5,000.00
Total Annualized Burden Estimates		572		31,340.00

Assuming a staff person with a salary of about \$50,000 per year (or \$24 per hour) is needed to complete the applications, the totals annualize dollars spent on respondent burden is \$761,217.60 depicted in table A.12-2 Estimates of Annualized Cost to Respondents. Wage rates were determined using <http://www.bls.gov/bls/wages.htm> website.

A.12-2 Estimates of Annualized Cost to Respondents

Type of Respondent	No. of Respondents	Average Time per Response	Frequency of Response	Hourly Wage Rate	Respondent Cost
Grantee	572	55.45	1	\$24.00	\$761,217.60

13. Estimates of Other Total Annual Cost Burden to Respondents or Record keepers.

There are no capital costs, operating costs, or maintenance to report.

14. Annualized cost to the Federal Government.

It is estimated that within FNS there is an average of about 20 hours of labor required to process an application package for this data collection. This labor estimate includes time spent by grants management staff to process an application (2 hours) and time spent by Agency staff to conduct a thorough technical review of each application (3 staff x 6 hours). Assuming 472 applications will be received in FY 2008, it is anticipated that 9,440 hours will be needed to process and review these applications. Assuming that the Agency staff participating in the processing and review of these applications make about \$38 per hour, the estimated annual cost to the Federal Government is \$358,720 (9,440 hours X \$38). In addition, the grants themselves are expected to total about \$35 million depending on how many grants are funded on a competitive basis and the merits of the proposals received. Wage rates were determined using <http://www.bls.gov/bls/wages.htm> website.

15. Explanation for Program Changes or Adjustments.

This is a revision to the currently approved information collection. The number of respondents increased from 353 to 572 an increase of 219 respondents. While there were additional grant programs added to the collection activities, overall there was no significant change to the total burden hours previously estimated by FNS. The change for this revision is from 32,380 to hours 31,340 hours, or a reduction of 1,040 hours. This is mainly attributed to several discretionary grant programs being made permanent and no longer being competitive and several new discretionary grant programs were added from the 2006 Child Nutrition/WIC Reauthorization Act and the 2008 Farm Bill.

16. Plans for Tabulation and Publication and Project Time Schedule.

Information in the grant applications will not be published. Disclosure of information contained in the grant application package is subject to the Freedom of Information Act and The Privacy Act. FNS will publicize summary information of the applicants that receive funding at the FNS website – <http://www.fns.usda.gov>.

17. Reason(s) that Display of OMB Date is Inappropriate.

There will be no request for an exception to the practice of displaying the expiration date for OMB approval.

18. Exception to Certification for Paperwork Reduction Act Submissions.

There will be no exception to the certification statement.