

Supporting Statement for Paperwork Reduction Act

Emergency Food Program Infrastructure Grant

**List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512**

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**Supporting Statement for Paperwork Reduction Act
The Emergency Food Assistance Program (TEFAP)**

**Justification for Adding
Emergency Food Program Infrastructure Grant
To the List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512**

1. Circumstances making the collection of information necessary.

Public Law 110-246, the Food, Conservation, and Energy Act of 2008, enacted on June 18, 2008, authorized the USDA Food and Nutrition Service (FNS) to make grants to eligible entities to carry out activities that support, improve, and/or expand the infrastructure of the emergency food network. Under the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010 (Public Law 111-80), Congress appropriated \$6 million for these grants.

FNS intends to release two Request for Applications (RFA), one for emergency feeding organizations (EFO) serving primarily rural areas, and one for all other EFOs. Other than the applicant eligibility, both RFAs are the same. This separation was done to facilitate and manage the application process. The hours reflected in this package are for both application packages. FNS intends to competitively award grants to approximately 35 emergency feeding organizations, such as food banks, food pantries, and soup kitchens, under the two solicitations. Each applicant will be required to submit a proposal to FNS describing the project, the proposed activities, and associated budget. A panel of experts from FNS will evaluate and score each proposal received, and make a final determination of the best proposals for the award. The information to be collected is not mandated by law or regulation.

FNS will post the RFA package for the Emergency Food Program Infrastructure Grants on its website on or about March 31, 2010. The RFA will also be posted on www.grants.gov.

2. Purpose and Use of the Information.

The primary users of the information collected from the applicants are FNS staff who will serve on a panel to systematically review, evaluate and approve the grant/cooperative agreement applications and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The selection criteria are contained in the RFA package. This process will occur only once this year.

3. Use of Information Technology and Burden Reduction.

In compliance with E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the application from the www.grants.gov website. Additionally, applicants may apply for this opportunity directly through www.grants.gov. Applicants may also submit their applications via e-mail. FNS will not accept faxed applications or applications submitted via mail or courier. FNS will require each grantee to submit semi-annual and final Financial Status Report using SF using SF- 425 and SF-425A. The Recipient is required to enter the SF-425 reporting information into the Food Program Reporting System (FPRS) at www.fprs.fns.usda.gov. Standard forms required SF-424, SF-424A, SF-424B, SF-424C, SF-424D and SF LLL are fillable and can be submitted online at www.grants.gov. FNS anticipates that approximately 80 percent of applications will be submitted electronically, or 80 out of 100 organizations.

USDA Grant Certification Forms:

1. AD-1047 Certification Regarding Debarment, Suspension, and Other Responsibility Matters;
2. AD-1048 Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction (Must submit with application only if a Sole Source Contractor is identified); and
3. AD-1049 Certification Regarding Drug-Free Workplace Requirements.

In addition a final report will be required.

4. Effort to Identify Duplication and Use of Similar Information.

There is no similar data collection effort available. This program solicitation is new and unique.

5. Impacts Small Businesses or Other Small Entities.

The information request is held to the minimum amount required.

6. Consequences for Collecting the Information Less Frequently.

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. The consequence for not collecting the information is the inability to award grant funds to emergency food providers for use in strengthening the infrastructure of food pantries, soup kitchens, and food banks as requested by Congress in The Food, Conservation, and Energy Act of 2008.

7. Special Circumstances Relating to the Guideline of 5 CFR 1320.5.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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

A 60-day notice was published in the Federal Register on August 20, 2008, (Volume 73, Number 162, page 49159-49160) soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package. FNS received one public comment in response to the Federal Register notice.

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

9. Explanation of Any Payment or Gift to Respondents.

There are no plans to provide cash payments or gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents.

Provision of the information requested is entirely voluntarily. The collection of this information is for the purpose of aiding in the review of applications prior to grant award decisions and for management of grants. This information will be used within FNS and may also be disclosed outside FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement respect the existing policy with regard to confidentiality. FNS will work with the Grantee(s) and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act which requires that Grantee provides release permission and are informed of the use of the information.

11. Justification for Sensitive Questions.

There are no questions of a sensitive nature included in this data collection.

12. Estimate of Hours Burden Including Annualized Hourly Costs.

FNS estimates that approximately one hundred respondents will submit an application for the

infrastructure grant. It is estimated that the average applicant will spend 10 hours designing and constructing their proposals. This is based on the general fact that applicants will have about forty-five days to complete their proposals.

A.12.1 Estimate of Hours Burden on Respondents for Application Pre-Award

Type of Respondent	Estimated No. of Grant Applications (Responses)	Frequency of Response	Total Annual Responses	Estimated Time to Complete each Application	Total Estimated Burden Hours
Grantee (Not-for-Profit agencies)	100	1	100	10	1,000

Respondents have a full range of discretion in how they design and develop a proposal. FNS has provided guidance in the RFA on the information that is needed to evaluate the proposals and select the most promising grantee(s). Hourly estimates identified above are used as the basis for determining total annual cost burden to respondents of the application.

Post-award burden hours are based on the production of the quarterly, annual, and final progress reports and financial reports that are submitted to FNS by the grantees selected for the project. FNS estimates that 35 emergency food providers will be selected for funding.

These reports will ask for a description of the activities that took place during the previous quarter and report any deviations and difficulties. The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant.

For the purpose of this burden estimate, FNS assumes that 35 grantees will be awarded funds. The total estimated burden on the 35 winning grantees of post award burden is reflected in the following table:

A.12.2 Estimate of Hours Burden on Respondents for Application Post Award

Action	Number Respondents	No. Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Semi-annual Financial Reports	35 Grantees selected	2	70	2	140
Final Report (progress and financial)	35	1	35	80	2,800
Total Hours	-	-	-	-	2,940

Pre-award burden 1,000
Post-award burden + 2,940
Total burden = 3,940

Total Pre-award cost to the public is 1,000 hours x \$20.09 hourly wage = \$20,090.
Pre-award costs are one-time only costs.

Total Post-award annual costs for routine reporting are 2,940 hours x \$20.09 = \$59,065. Post award costs are annual costs for the duration of the project for a total of \$79,155.

FNS estimates that each respondent will utilize at least one full time member at a cost of \$20.09 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable. Wage rates were determined using the <http://www.bls.gov/bls/wages.htm> website, and reflects mean average hourly rate for occupation code 21-0000, Community and Social Service occupations in the May 2008 National Occupational Employment and Wage Estimates.

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

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Annualized Cost to the Federal Government.

Costs are estimated for two categories:

- (1) Grant costs are expected to total about \$6 million based on the assumption of 35 awards. Actual awards will depend on how many grants are funded on a competitive basis and the merits of the proposals received.
- (2) FNS staffing costs, which are identified below.

The processing and reviewing the applications is estimated to cost \$113,520. This is based on an estimate of a total of 22 hours of labor to process *each* application package. The estimate assumes an hourly cost per staff persons of \$51.60 per hour (the average salary for GS-13 grade level including overhead and benefits). This labor estimate includes 6 hours by grants management staff to process an application, 8 hours total by 4 FNS staff to conduct a thorough technical review of each application, and 8 hours by the panel chairperson to document the technical reviews and prepare the recommendations for award. Assuming 100 applications will be received, it is anticipated that 2,200 hours will be needed to process and review these applications. Costs other than salary costs are negligible.

Total hours:	2,200 hours
Total Annualized Cost to the Federal Government:	\$113,520

15. Explanation for Program Changes or Adjustments.

There are no changes of the information collection since the last OMB approval.

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

FNS will publicize summary information of the applicants that receive grant funding on the FNS website.

17. Reason(s) Display of OMB Expiration Date Is Inappropriate.

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

18. Exception to Certification for paperwork Reduction Act Submissions.

There are no exceptions to the certification statement.