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**Supporting Statement for Paperwork Reduction Act
Special Nutrition Programs (SNP)**

**Justification for Adding
Home Delivery and Food Backpack Demonstration Projects
to List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512**

- 1. Explain the 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.**

The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriation Act of 2010 (P.L. 118-80), enacted on October 21, 2009, allocated \$85 million to the USDA Food and Nutrition Service (FNS) to carry out demonstration projects to develop and test methods of providing access to food for children in urban and rural areas during the summer months when schools are not in regular session to reduce or eliminate the food insecurity and hunger of children and to improve the nutritional status of children. The Home Delivery and Food Backpack demonstration projects will test modifications to the traditional Summer Food Service Program (SFSP): the Home Delivery demonstration will waive the congregate meal service requirement for SFSP service, and the Food Backpacks demonstration will provide children with take home food (Food Backpacks) on days that SFSP meals are not available, typically on the weekends. Demonstration funds may be used by selected States and service institutions to pay for food, supplies, securing or modifying transportation resources to deliver meals to children (Home Delivery demonstration only),

added administrative expenses incurred by participating in the demonstration, and costs associated with outreach to potential participants and potential sponsoring organizations.

FNS intends to competitively award demonstration project funds to State Agencies that have agreements with FNS to administer the Summer Food Service Program (SFSP). The State agency in turn will pass through the funds to selected service institutions. Each applicant will be required to submit a proposal to FNS describing the demonstration project proposal 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 demonstration. As part of the review and subsequent award process, FNS will seek information from the applicants that includes a description of their proposed approach to the proposal, budget projections, and staffing levels and capabilities. The information to be collected is not mandated by law or regulation.

FNS will post the Request for Application (RFA) package for the *Home Delivery and Food Backpacks Demonstration Projects* on its website on or about October 2010 at www.grants.gov and <http://www.fns.usda.gov/ora/menu/DemoProjects/SummerFood/Announcement.htm>.

- 2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

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 demonstration project/cooperative agreement applications and recommend the State Agencies most likely to meet program objectives and most responsive to the solicitation. FNS staff will use the following forms to evaluate applications: SF-424, SF-424A, SF-424B, SF-LLL, AD-1047, and AD-1052. The selection criteria are contained in the RFA package. This process will occur only once this year.

Once grantees are selected, they will be required to report financial data using the SF-425 (Federal Financial Report) and the SF-425A (Federal Financial Report Attachment).

Grantees will be required to obtain an eAuthentication login and password to enter financial information into the Food Programs Reporting System (FPRS) at www.fprs.fns.usda.gov.

- 3. 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.**

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 www.grants.gov or from

<http://www.fns.usda.gov/ora/menu/DemoProjects/SummerFood/Announcement.htm>.

Additionally, applicants may apply for this opportunity directly through www.grants.gov.

FNS anticipates that approximately 50 percent of applications will be submitted electronically, or 15 out of 30 States. State agencies that send in their applications via mail or courier are required to submit an original hard copy and two copies of their proposals to the address listed on the RFA. FNS will not accept emailed or faxed applications. FNS will require each grantee to submit quarterly and final Financial Status Report using SF- 425 and SF-425A. The Recipient is required to enter the SF-425 and SF-425A reporting information into the FPRS at www.fprs.fns.usda.gov.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

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

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information request is held to the minimum amount required.

- 6. 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.

FNS will seek minimal information that will be critical in selecting the most promising grantees. Reduced frequency is not possible. The consequence for not collecting the information is the inability to award demonstration project funds as requested by Congress in The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriation Act of 2010 (P.L. 118-80).

7. 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;**

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

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

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

- **requiring respondents to submit more than an original and two copies of any document;**

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

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

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

- **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;**

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

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

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

- **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**

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

- **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.

- 8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.**

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.

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 form, and on the data elements to be recorded, disclosed, or reported.

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. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

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 demonstration project selection decisions and for management of the demonstrations. 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 demonstration project selectees 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 selectees provide release permissions and are informed of the use of the information.

- 11. 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 data collection.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**
 - 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.**
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

FNS estimates that approximately thirty (30) respondents will submit an application for the demonstration projects. It is estimated that the average applicant will spend 100 hours designing and constructing their proposals for a total of 3,000 burden hours pre-award. This is based on the general fact that applicants will have about two months to complete their proposals.

A.12.1 Estimate of Burden Hours on Respondents for Application

Type of Respondent	Estimated No. of Grant/CA Applications (Responses)	Frequency of Response	Total Annual Responses	Estimated Time to Complete each Application	Total Estimated Burden Hours
Grantee (State Agencies) <i>Pre-Award</i>	30	1	30	100	3,000

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 grantees. Hourly estimates identified above are used as the basis for determining total annual cost burden to respondents of the application.

For the purpose of this burden estimate, FNS assumes that four (4) grantees will be awarded funds to implement the Home Delivery and Food Backpacks Demonstration Projects. The 301 total estimated burden hours on the four selected States of post award burden is broken down in the following table:

Action	Number Respondents	No. Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Quarterly Progress and Financial Reports (<i>Post-Award</i>)	4 Grantees selected	4	16	10	160
Annual Report	4	1	4	15	60
Final Report (progress and financial)	4	1	4	20	80
SF-LLL	4	1	4	.167	0.668

Total Hours	4	-	28	-	300.668
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A.12.2 Estimates of Annualized Cost to Respondents for Application

Type of Respondent	Number of Respondents	Average Time per Response (hours)	Frequency of Response	Hourly Wage Rate	Total Respondent Cost
Grantee	30	100	1	\$40	\$120,000

FNS estimates that each respondent will utilize at least one full time member at a cost of \$40 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 occupational code 11-303 from the <http://www.bls.gov/bls/wages.htm> website.

Total Pre-award cost to the public is 3000 hours x \$40 hourly wage = \$120,000

Pre-award costs are one time only costs.

Total Post-award costs for routine reporting are 301 hours x \$40 = \$ 12,040

Post award costs are annual costs for the duration of the project, for a one-time total annual cost of \$132,000.

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 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.

14. Provide estimates of annualized cost to the Federal government. Also, 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.

Costs are estimated for two categories:

(1) Grant costs are expected to total about \$2 million based on the assumption of two to four 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 \$103,230. This is based on an estimate of a total of 62 hours of labor to process *each* application package. The estimate assumes an hourly cost per staff person of \$55.50 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, 48 hours total by 5 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 30 applications will be received, it is anticipated that 1,860 hours will be needed to process and review these applications. Costs other than salary costs are negligible.

Total hours:	1,860 hours
Total Annualized Cost to the Federal Government:	\$103,230

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

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

- 16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans for statistical analysis. FNS will publicize summary information of the applicants that receive demonstration project funding at

<http://www.fns.usda.gov/ora/menu/DemoProjects/SummerFood/Announcement.htm>.

- 17. 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.

18. Explain each exception to the certification statement identified in Item 19

"Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.

19. How is this Information collection related to the Customer Service Center?