

**National Institute of Food and Agriculture
Department of Agriculture
Information Collection OMB No. 0524-0042**

SUBJECT: Supporting Statement for Paperwork Reduction Act Submission to extend OMB 0524-0042, a Currently Approved Information Collection for NIFA's Current Information System (CRIS).

A. Justification

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 United States Department of Agriculture (USDA), National Institute of Food and Agriculture (NIFA) administers several competitive, peer-reviewed research, education and extension programs, under which awards of a high-priority are made. These programs are authorized pursuant to the authorities contained in the National Agricultural Research, Extension, and Teaching Policy Act of 1977, as amended (7 U.S.C. 3101); the Smith-Lever Act of 1914, as amended (P.L. 107-293, 2002); and other legislative authorities.

NIFA also administers several formula funded research programs. The programs are authorized pursuant to the authorities contained in the McIntire-Stennis Cooperative Forestry Research Act of October 10, 1962 (16 U.S.C. 582a-582a-7) (McIntire-Stennis Act); the Hatch Act of 1887, as amended (7 U.S.C. 361a-i) (Hatch Act); Section 1445 of Public Law 95-113, the Food and Agriculture Act of 1977, as amended (7 U.S.C. 3222) (Pub. L. No. 95-113); Section 1433 of Subtitle E (Sections 1429-1439); Title XIV of Public Law 95-113, as amended (7 U.S.C. 3191-3201) (Pub. L. No. 95-113); the Smith-Lever Act; and the Renewable Resources Extension Act. Each formula funded program is also subject to requirements, which were revised in March 2000, and set forth in the *Administrative Manual for the McIntire-Stennis Cooperative Forestry Research Program*, the *Administrative Manual for the Hatch Research Program*, the *Administrative Manual for the Evans-Allen Cooperative Agricultural Research Program*, and the *Administrative Manual for the Continuing Animal Health and Disease Research Program*. NIFA is developing administrative regulations for the formula funded programs it administers.

The Current Research Information System (CRIS) is the U. S. Department of Agriculture's documentation and reporting system for ongoing research and education activities in agriculture, food science, human nutrition, and forestry. CRIS forms AD-416, AD-417, AD-419 and AD-421 constitute a necessary information collection for publicly-supported research and education projects as set forth in requirements established in 7 CFR Parts 3400-3419 pertaining to the aforementioned authorities. This information collection is necessary in order to provide descriptive information regarding individual research, education, and integrated activities, to document expenditures and staff support for the activities, and to monitor the progress and impact of such activities.

NIFA is planning to transition from the collection of the CRIS AD-416, AD-417, AD-419, and the AD-421 through its phased implementation of the REEPort system. There is a pending submission to request approval for that collection of information under a new OMB clearance. Prior to and during the transition NIFA will require the approval to continue to collect this CRIS forms. Once transition to REEPort is fully implanted and phased in NIFA anticipates being able to expire the CRIS collection instrument.

2. Indicate how, by whom, 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 Current Research Information System (CRIS) operates administratively under the NIFA, but is a cooperative endeavor whereby information is collected on a project by project basis from many participant organizations, both federal and non-federal. Information is received from USDA agencies, State Agricultural Experiment Stations, the state land-grant colleges and universities, the institutions of 1890, state schools of forestry, cooperating schools of veterinary medicine, USDA grant recipients, and other cooperating institutions.

The information is collected primarily via the Internet through a web site that may be accessed from the CRIS home page (<http://cris.csrees.usda.gov>). The URL for the web site, entitled Forms Assistance/Data Management, is <http://cwf.uvm.edu/cris/>. This site provides access to CRIS Web Forms. Electronic submission via the Internet is encouraged, however when necessary, submissions are accepted via electronic mail attachments. One United States Department of Agriculture agency, the Agricultural Research Service, submits research project information electronically by direct transfer to the Web Forms server.

The CRIS Web Forms interface provides an intuitive, electronic means to submit required information to the CRIS collection. Screen shots of this interface may be found in the information collection list. Grant recipients who are required to submit CRIS forms receive preliminary information via a letter sent by the awarding NIFA program office. Online manuals for preparing CRIS forms are available through the CRIS Forms Assistance web page at <http://cwf.uvm.edu/cris/manuals.htm>. Guidance and supplemental information are further provided through hyperlinks embedded in the data entry screens. Further assistance can be obtained by directly contacting the CRIS staff. Contact information is also available for technical issues pertaining to the Web Forms site.

The information collection process is driven by the information associated with four forms developed and implemented specifically for this purpose in the late 1960s. The data associated with these forms are currently being collected by electronic processes and actual AD forms are not used as such. References to the AD numbers are maintained for identification and organization of the data in the collection process.

Form AD-416, *Work Unit/Project Description*, provides descriptive information pertaining to a research or integrated activity project. This information includes data items such as title, investigator, project number, performing organization, project type, objectives, approach, non-technical summary, keywords, need area, discipline, start date and termination date. This

information is required at the onset of a project and need only be resubmitted upon revision of the project.

The AD-417, *Work Unit/Project Description - Classification*, provides a predefined classification system to categorize the project with assignments of knowledge area, subject of investigation and field of science categories providing descriptive classification for each project. In addition to the three primary elements, a percentage of effort value associated with each set of assigned classification codes is also specified. Additionally, separate designations are made regarding the percent of the project pertaining to basic versus applied versus developmental research. Projects are also assigned percentage values for animal health or forestry related research activities when appropriate. The AD-417 form accompanies the AD-416 to comprise the two basic elements of a project description, and therefore, conforms to the same frequency requirements for submission as the AD-416.

The AD-421 is the progress/termination report form providing progress and impact information as well as publication citations relating to the project. The AD-421 *Progress Report* is required on an annual basis and reflects progress for a 12-month period. A termination report is required within 90 days following the termination of a project and reflects the progress over the entire life of the project.

The AD-419 form, *Funds and Staff Support*, provides data on annual expenditures for support of the project, identified by funding source. NIFA administered funds, other federal funds, and non-federal funds are the primary categories of funding. The AD-419 form also provides information on staff support allocated to the project based on years of effort in one-tenth increments. This information is requested annually and reported on a fiscal year basis.

Form NIFA–2008, *Assurance Statement(s)*: This form is used in formula grant programs and provides required assurances of compliance with regulations involving the protection of human subjects, animal welfare, and recombinant DNA research. The burden for this form is currently approved under OMB approval number 0525-0039.

The historical mission of CRIS, broadly stated, is to document the research activities of the USDA and the State agricultural research system partners, to satisfy a variety of reporting requirements, and to provide access to research information. This mission supports one of the NIFA's primary functions, stated in the agency strategic plan, of providing program leadership to identify, develop, and manage programs to support university-based and other institutional research. The boundaries and scope of the CRIS mission are being expanded each year toward a more comprehensive purpose and now include documentation of agency activities in education and extension. As such, the information collected for CRIS is utilized in an essentially unlimited number of ways for a wide array of purposes. Generally, CRIS provides ready access to information through public web accessible data as well as individually requested, customized reports and services for agency officials, program leaders, administrators and managers. The information provided helps users to keep abreast of the latest developments in agricultural, food science, human nutrition and forestry research and education; track resource utilization in specific target areas, plan for future activities; plan for resource allocation to research and education programs; avoid costly duplication of effort; aid in coordination of research and

education efforts addressing similar problems in different locations; and aid researchers and project directors in establishing valuable contacts within the agricultural community.

Descriptive information pertaining to documented projects is available to the general public as well as the research and education community contributing to CRIS. Limited financial information is available on individual grant projects and cooperative agreements as well as summary financial information through the CRIS web site. Cooperating institutions, including the state agricultural experiment stations, state forestry schools, and land grant institutions (1862, 1890, and 1994), have access to all the data pertaining to their institution. Many institutions take advantage of this access utilizing CRIS system facilities to manage the research programs at their institution. In addition, NIFA staff members can request specialized reports directly from the CRIS staff. These requests can include financial disclosure pertaining to a particular subject area or targeted program. The nature of this type of request characterizes one of the strengths of the CRIS information collection. The system collects obligations and expenditures on individual projects, however, information can be retrieved and aggregated based on subject areas or targeted programs, and corresponding financial information can be tabulated accordingly. The inclusion of subject-based classifications and subject specific descriptive fields supports a unique retrieval capability in this system. The information can be utilized nationally, regionally, or at more detailed levels, by program leaders, budget officials, and administrators to identify resource utilization, monitor research and education activity in specific target areas, and support decision making and resource allocation, not just on individual projects, but also for specific program areas. Combining system capabilities facilitates the program evaluation, accountability, and decision making processes.

Collection requirements are essentially static and have been modified very little over the course of this ongoing collection. A significant change occurred when the *Manual of Classification of Agricultural and Forestry Research, Revision VI* was implemented in 1998 for the AD-417 categories. The implementation of the new classification version simplified the process of completing the AD-417 submission and reduced the burden hours on the respondent. A more recent revision of the Manual of Classification, Revision VII changed the name of Research Problem Area to Knowledge Area and modified all Knowledge Area descriptions to enable easier classification of non-research activities. Other modifications were relatively minor and include general characteristics concerning items such as character limitations, number of allowable values in an item, and the addition of an impact statement and a non-technical summary to permit additional narrative description.

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.

This information collection permits electronic submission of responses. Through the use of a web-based interface known as CRIS Web Forms, respondents are able to enter information and submit that information to NIFA electronically. While this is the preferred method of submission, and the majority of the information collection is obtained through Web Forms, some information is accepted in various other electronic formats at the request of the respondent. The

Web Forms facility has been shown to be a more efficient mode of data submission than paper-based processes and has been readily adopted and accepted by respondents. Respondents have acknowledged the efficiency of the web-based input process and their preference for this mode of submission.

4. 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 Item 2 above.

The structure of the CRIS information collection, periodic reviews within NIFA of reporting requirements and the cooperative interactions with the contributing institutions, help assure that duplication does not occur in this process. Other units within NIFA have adopted the input derived from the CRIS information collection as the vehicle for satisfying reporting requirements under their program conditions, eliminating collection activities that were overlapping. This has increased the critical nature and importance of the CRIS information collection. The elements associated with the CRIS information collection are essentially unique but are reviewed on a regular basis for consideration of the occurrence of overlap or duplication with other collection processes. In general, the collection of project descriptions and associated information documented by the AD-416, AD-417, AD-419 and AD-421 have no parallel or corresponding items in other collection efforts. As such, there is no recognized duplication of effort with respect to this collection of information.

As stated previously, NIFA is transitioning to the REEPort system and the progress report will be modeled based on the Research Performance Progress Report (RPPR), which is to be by all Federal research agencies.

5. 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.

NIFA awards approximately 130 Small Business Innovation Research (SBIR) grants each year. All of the awardees are required to submit AD-416, AD-417, and AD-421 forms to document their activities. Approximately 35 of the awardees receive Phase II grants and are also required to submit AD-419 forms to report their annual accomplishments and expenditures. The awarding unit within NIFA provides additional guidance to awardees to reduce their burden to the extent possible.

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.

The information obtained through the collection process for CRIS furnishes unique data that is not available from any other source. Interruption in the collection process, or failure to collect this information, would severely compromise one of NIFA's primary functions stated in the agency's strategic plan of "providing program leadership to identify, develop, and manage programs to support university-based and other institutional research." Information in the collection is critical to other NIFA programs in meeting their mandated obligations and responsibilities. Additionally, the information stored in CRIS is utilized by state institutions in

administering their individual research programs and in their planning processes for the allocation of resources in critical research areas. The information gap created by a failure to collect CRIS information would have serious negative impacts on the administration and management of agricultural research and education on a national level. CRIS is an electronic system providing the capability of storing and retrieving program information on USDA-supported research, education, and extension activities. Failure to provide the system to the participating agencies and institutions would result in a significant increase in the burden on those organizations to meet their information requirements and accomplish program management.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances that would cause an information collection to be conducted in a manner that would require a respondent to report information more often than quarterly.

There are no special circumstances that would cause an information collection to be conducted in a manner that would require 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 that would cause an information collection to be conducted in a manner that would require respondents to submit more than an original and two copies of any document.

In order for an institution to participate as a state cooperator in the electronic submission of project documents, the institution must agree to observe certain procedures. One stipulation for audit purposes agreed to by the cooperator requires the institution to retain original signed documents in their files for at least three years after the conclusion or termination of the authorized effort. This special requirement could result in the necessity to retain records for more than three years.

There are no special circumstances that would cause an information collection to be conducted in a manner 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 that would cause an information collection to be conducted in a manner requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no special circumstances that would cause an information collection to be conducted in a manner 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.

There are no special circumstances that would cause an information collection to be conducted in a manner requiring respondents to submit proprietary trade secrets 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.

8. 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.

A notice of intent to extend the information collection was published in the Federal Register on March 30, 2010 (75 FR 15669). The agency has received one public comment in response to the notice, but it did not address the accuracy of the burden, or the use of the information.

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

There are no plans to provide any payment or gift to respondents, other than reenumeration of cooperators or grantees.

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

There is no specific assurance of confidentiality provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

NIFA does not request information of a sensitive nature through CRIS.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Costs associated with the burden hours were calculated by applying average salary figures for scientific/professional hours and the administrative hours. The dollar amounts were then summed to arrive at the average cost associated with the collection process associated with each form on an annual basis. These figures were increased by 3% from the previous approval amount to account for increased salary. The estimates are summarized in a table on the following page.

Table Reference for Item 12

Current Research Information System -- Data Collection

| Description | Form | Number of Respondents | Responses / Respondent | Total Annual Responses | Estimated Hours/Response | Annual Burden Hrs. | Estimated Cost/Response | Annual Cost |
|--|---------------|-----------------------|------------------------|------------------------|--------------------------|--------------------|-------------------------|--------------------|
| Research Work Unit Description - Research Resume | AD-416 | 4,096 | 1 | 4,096 | 3.9 | 15,974 | \$140.53 | \$543,955 |
| Research Work Unit Description - Classification of Research | AD-417 | 4,096 | 1 | 4,096 | 0.7 | 2,867 | \$23.08 | \$89,337 |
| Research Funds and Staff Support | AD-419 | 15,199 | 1 | 15,199 | 1.4 | 21,279 | \$22.97 | \$290,226 |
| Progress Report and Termination Report | AD-421 | 12,584 | 1 | 12,584 | 2.7 | 33,977 | \$93.09 | \$1,213,683 |
| Totals | | | | | | 74,097 | | \$2,137,202 |

13. Provide an estimate for the total annual cost burden to respondents or record-keeper resulting from the collection of information, (Do not include the cost of any hour burden shown in Items 12 and 14). The cost estimate 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 the CRIS information collection.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

For fiscal year 2010, CRIS is supported by 8 FTE positions (two vacant) devoted exclusively to system maintenance, data management, retrieval and reporting services for this data collection. This effort is supported by a budget of \$1,275,709. Approximately 65% of the budget is expended on direct personnel costs and other human resources in support of the collection. The remaining 35% supports all other costs of program operation, including maintenance, operation, upgrading of equipment (hardware & software), materials and supplies, travel, training, etc. This is the only identifiable cost to the federal government for the CRIS data collection that would not be incurred without this collection effort.

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

There is a minor overall increase in the total annual burden as a result of recalculating the number of forms received. This adjustment does not correlate directly to any specific program changes, but simply represent an adjustment in the volume of the various transactions NIFA has received. NIFA also adjusted for a double counting error in the number of respondents in the previous submission.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no planned or scheduled publications generated from CRIS information in the traditional concept. However, information in the CRIS data collection is organized in a searchable database of elements supported through the AD-416, AD-417 and AD-421 input processes. The primary database is available on the Internet and can be accessed by

the public. Various options and formats are available for selection and output of the information stored in CRIS. The elements from the AD-419 are stored in restricted fields, and therefore, are not on the web site nor available to the public. Tables summarizing AD-419 data are generated for each new fiscal year collected. The tables are overall summaries, approved by the contributors for general release. The summaries are available through the CRIS web site for access by the public. The CRIS staff can provide other types of summaries, standard reports and custom reports of more detailed levels of CRIS information by special request, but only to agency authorized individuals, not to the public.

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.

There is no effort underway to seek approval not to display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83- I.

There are no exceptions to the certification statement and hence, no explanation is required.