

## 2010 SUPPORTING STATEMENT

### Rural Development Operations and Management – Faith-Based and Community Initiatives – Non-Profit Customer Voluntary Survey on the Equal Treatment Rule

OMB No. 0575-0192

#### A. Justification

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

The Faith-Based and Community Initiative (FBCI) was implemented in the U.S. Department of Agriculture (USDA) by Executive Order 13280-Responsibilities of the Department of Agriculture and the Agency for International Development With Respect to Faith-Based and Community Initiatives, December 12, 2002. On July 9, 2004, USDA published 7 CFR Part 16, also known as the Equal Treatment Rule, ensuring a level playing field for all organizations in the federal grants process. In particular, this rule ensures that faith-based organizations will receive equal treatment when competing for federal funding opportunities within the framework of Constitutional church-state guidelines. This policy applies the standards of equal treatment to all federal, state, and local agencies whose activities and programs are federally funded.

In 2004, the USDA Rural Development agency started to conduct a variety of outreach and technical assistance activities to help promote funding opportunities for faith-based and community organizations (FBCOs) and strengthen their capacity to serve those in need. One important component of many of these activities is to educate FBCOs on their rights and responsibilities in applying for and accepting Federal funds under the Equal Treatment Rule and related regulations. Likewise, USDA Rural Development is also educating its employees on the rights of FBCOs during the application process and their responsibilities when managing Federal funds. This collection of information will assist USDA Rural Development in measuring how effective these efforts have been, especially in relation to how well faith-based and community organizations understand the Equal Treatment Rule.

The survey results will enable USDA Rural Development to assess and improve upon its outreach and technical assistance activities as they relate to the Equal Treatment Rule and related regulations.

Please note that in addition to the questions regarding the application process itself, the survey also contains questions regarding the characteristics of the respondent's organization (e.g., size of budget, faith-based or secular). We anticipate that these organizational questions will help us to learn more about our education efforts to date and how to possibly better target those efforts in the future.

##### 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.

This survey is designed to measure how well faith-based and community organizations understand the principles of the Equal Treatment Rule as implemented during the application process. The results of this survey will allow USDA Rural Development to determine the effectiveness of its outreach and technical assistance activity in this regard. By identifying areas of those educational services that need improvement, the agency will be able to better target its efforts in the future to faith-based and community organizations. Based on the previous survey

results, the Equal Treatment PowerPoint used for training of nonprofits was revised. The Agency also did some additional training and providing of resources on the Equal Treatment Rule, 7 CFR part 16, for Rural Development staff

USDA Rural Development Faith-Based and Community Initiatives staff will collect responses to this survey. Responses are voluntary and anonymous.

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.

Varied notification methods will be used. Many of the faith-based and community organizations to be surveyed are located in rural areas; they may not have access to computers for electronic submission of responses. The applicant list will receive a letter and a paper hard copy of the survey distributed through the United States Postal Service. The survey will include a postage paid envelope for the responses. In addition, so that rural communities are aware of the survey, notices will be sent to state and field offices to publicize the survey during meetings. Information regarding the upcoming survey will be posted on the Rural Development Faith-Based and Community Initiatives web site only for notification purposes.

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.

Currently, there is no formal mechanism available for measuring understanding of the Equal Treatment Rule on the part of faith-based and community organizations. No such survey has been conducted in USDA or in any of the 11 other Federal entities involved in the Faith-Based and Community Initiative.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The collection of this information will not have a significant economic impact on small entities. The survey will not require a significant amount of time to complete and will not involve any significant financial costs.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.

One aspect of the Faith-Based and Community Initiative is public outreach and education surrounding the Equal Treatment rule. Information collected in this survey will allow USDA Rural Development to ascertain the effectiveness of its outreach and technical assistance activities to support these purposes.

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

a. Requiring respondents to report information more than quarterly.  
Respondents will only need to report information once.

b. Requiring written responses in less than 30 days. Based on previous experience with other surveys, USDA has found that if customers are given 30 days to respond to a survey,

they are more likely to postpone their response and ultimately forget to answer the survey. A request of a response within two weeks usually motivates the customer to respond more quickly and improves the overall response rate.

c. Requiring more than an original and two copies. Only the original survey needs to be completed and returned to USDA Rural Development.

d. Requiring respondents to retain records for more than 3 years. The survey does not require the respondents to retain information.

e. Not designed to produce valid and reliable results. Not applicable.

g. Requiring use of statistical data classification, which has not been reviewed and approved by OMB. All statistical data classification will be reviewed and approved by OMB.

f. Requiring a pledge of confidentiality. Response to the survey is voluntary and anonymous.

h. Requiring submission of proprietary trade secrets. No requirement for submission of proprietary trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. 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, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

A notice was published in the Federal Register on June 16, 2010, vol 75, number 115, page 34093. No public comments were received.

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

Customers will not receive a payment, gift, or incentive to respond.

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

The survey is voluntary and anonymous.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

There are questions of a sensitive nature dealing with religion on the survey, but the questions are directed to an organization rather than an individual. Questions 9 and 10 of the survey deal with hiring practices based on religious affiliation and the display of religious symbols. Responses to these questions will help USDA Rural Development to further understand if faith-based organizations in particular have knowledge about their rights and responsibilities as set forth in 7 CFR Part 16-Equal Treatment of Religious Organizations.

12. Provide estimates of the hour burden of the collection of information.

The Rural Development Voluntary Survey on the Equal Treatment Rule will be sent to approximately 4,000 organizations and is estimated to take on average 5 minutes per response.

Anticipated 20% response rate yields a total hour burden to respondents of approximately 66 hours (800 respondents x .083 hours/response).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information

There are no capital and start-up costs or operation and maintenance costs. Respondents are provided with postage-paid return envelopes for the survey.

14. Provide estimates of annualized cost to the Federal Government.

The estimated annualized cost to the Federal Government for this survey is referenced below. A more detailed breakout is included as Attachment A.

Administrative Costs	\$	900.00
Analysis		900.00
Labor (Processing)		5,736.20
Postage		5,601.28
Printing		<u>1,600.00</u>
Total Cost to Government	\$	14,737.48

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

There are no changes or adjustments to originally submitted request.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

Not applicable, results will not be published.

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 will display the OMB expiration date on the survey associated with this information collection.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-I.

There are no exceptions noted.

19. How is this information collection related to the Service Center Initiative (SCI)? Will the information collection be part of the one stop shopping concept?

Not applicable.