

UNITED STATES DEPARTMENT OF AGRICULTURE
Risk Management Education and Community Outreach Partnerships:
Request for Applications
OMB NUMBER: 0563-0067

PURPOSE:

The purpose of this request to the Office of Management and Budget (OMB) is for approval of a revised Information Collection Burden package submitted by the Federal Crop Insurance Corporation (FCIC), operating through the Risk Management Agency (RMA). The package concerns specific information that interested parties are to provide RMA when responding to a Request for Applications (RFA) for Risk Management Education and Community Outreach Partnerships. The RFA announces the availability of funding to parties willing to assist RMA in carrying out local and regional risk management and crop insurance education programs. The information collected from applicants would be used to review, evaluate, and select those applications for funding that would best support the objectives of RMA's risk management, community outreach and crop insurance education programs.

- 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 Federal Crop Insurance Corporation, operating through the Risk Management Agency (RMA) has two application programs to carry out certain risk management education provisions of the Federal Crop Insurance Act. The two educational programs requiring applications are a) to establish crop insurance education and information programs in States that have been historically underserved by the Federal Crop Insurance Program [7 U.S. C. 1524(a)(2)]; and b) to provide agricultural producers with training opportunities in risk management, with a priority given to producers of specialty crops and underserved commodities [7 U.S.C. 1522(d)(3)(F)].

The proposed information collection consists of an application package usable by interested parties in applying for funding under any of RMA's two educational programs identified above. The information from this application package is needed by RMA and review panel members to evaluate and rank applicants. The information is also needed by RMA to properly document and protect the integrity of the process used to select applications for funding.

- 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.**

RMA will collect the information covered by this data collection request from applicants for the two educational programs through completed forms and narratives. RMA anticipates that this information will be collected annually in response to a Request for Application notice to be published in the Federal Register

The application package available to applicants will include general information and instructions; the requirements for the proposal narrative statement and Statement of Work (SOW) describing how the applicant will address the program objectives; a description of the budget; Standard Forms (SF) 424, 424A, 424B, LLL, and AD-1049 which requests basic information, budget information and assurances; and certifications. OMB has separately approved the information collection burdens for SF-424, 424A, 424B, LLL, and AD-1049.

The proposed information collection is related to the requirements for the program narrative statement and the budget narrative. The requirements for the program narrative statement and budget narrative are based on the requirements described in section 1.c (5) of OMB Circular A-102 and OMB Circular A-110 (as implemented at USDA 7 CFR Parts 3015.3016 and 3019), and will apply to all types of applicants—States and local governments, non-profit organizations, for-profit organizations, and institutions for higher learning. Section 1.c (5) of these two OMB circulars is attached for reference.

The sole use of the information provided by the applicants is in application processing and evaluation. The sole users of the information are RMA staff and confidential review panel members. The narrative statement provided by the applicant will allow the confidential review panel to evaluate and compare applicants and to select those applicants most likely to meet program objectives. The budget narrative will allow the confidential review panel and RMA staff to determine that costs associated with the application are reasonable and permitted under the program. For those applications that are selected for funding, the information in the narrative statement and the budget narrative will be used to create the terms of cooperative agreements between the applicant and the agency. Information will not be shared outside of RMA or outside of the confidential evaluation panel.

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 adapting this means of collection. Also describe any consideration of using information technology to reduce burden.

All application must be submitted electronically on Grants.gov. Potential respondents will be able to receive the application package at Grants.gov or by downloading the application from the RMA web site.

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.

Applications are given a unique number and are reviewed to avoid duplication to current or prior projects. The award is for one (1) year only and there are no renewals or add-ons to awarded projects that extend beyond the project end date or change the SOW. The information requested cited in the Request for Application is not available elsewhere. Information submitted by an applicant in a prior program year would not be relevant to a later year because program needs

change, agency priorities change, and the characteristics and capacity of the applicant can change.

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

The information requested is the minimum amount needed to meet program requirements. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate applicants against program criteria.

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.

If the information is not collected, RMA program officials will not have adequate data to select appropriate projects. RMA will seek the minimum information needed to select the applicants most likely to achieve program goals. Reduced frequency is not possible as the annual frequency of applications coincides with the annual appropriation of funds.

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

- a) requiring respondents to report information to the agency more often than quarterly;
- b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c) requiring respondents to submit more than an original and two copies of any document;
- d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- e) 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;
- f) requiring the use of a statistical data classification that has not been reviewed and approved by OBM;
- g) 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
- h) 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 that require the collection to be conducted in a manner stated above.

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. Specifically address comments received on cost and hour burden.

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A notice was published in the Federal Register on February 27, 2012, Volume 77, Number 38, page 11483 soliciting comments on RMA's intent to request OMB approval for an information collection regarding Agricultural Risk Management Education and Information programs. No comments were received.

RMA headquarters' staff and personnel in RMA's Regional Offices often discuss the application processes for educational programs with agreement holders during the course of administering cooperative agreements. A discussion on these issues between RMA and potential applicants also occurs often at national and regional meetings of agricultural professionals.

The following persons outside of the agency were consulted on their views of the information being collected:

Dr. Russell Tronstad, University of Arizona, (520) 621-2425
Mr. Tom McConnell, West Virginia University Extension Service, (304) 293-6131
Ms. Karen Powell, Pennsylvania Department of Agriculture, (717) 705-9511

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

Applicants for RMA cooperative agreements are not paid for submitting applications nor are they compensated for their time spent in preparing proposals.

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

RMA is requesting the information pursuant to its statutory authority to award cooperative agreements. Submission of applications is entirely voluntary. The collection of information is for the purpose of aiding in the review of applications prior to the awarding of cooperative agreements. This information will be used within RMA and may also be disclosed outside of

RMA as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act.

- 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 the cooperative agreement application package.

- 12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

Please see the separate spreadsheet, RMA-71, for a breakout of hours.

Total annual cost of burden to respondent

In estimating the annual cost burden to applicants, hourly rate estimates from the Bureau of Labor Statistics National Compensation Survey have been used. A blended rate for level 11 economists (\$43.00/hour) and level 9 social scientists (\$35.00/hour) has been used with a weight of 0.5 applied to each category. A blended rate of \$39.00/hour in 2011 was derived by inflating wage data collected in 2009 and 2011, respectively, by 2.5 percent per year. Applying this hourly rate to the burden hour estimate yields a total annual cost of \$158, 739.75.

- 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. 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.**

RMA estimates the average time required for RMA, or designated review panel members to process and evaluate an application under both the Risk Management Education and Community Outreach Partnerships and Targeted States of RMA's risk management education programs is 20 hours. This estimate includes time spent by RMA staff to process an application (2 hours) and

time spent by review panel members to conduct a thorough technical review (3 persons x 6 hours). Assuming 250 applications will be received and approximately 2/3 will be forwarded as qualified (165 applications) in FY 2012, RMA estimates that 3,300 hours will be needed to process and review all applications. Assuming that the hourly cost of staff and reviewers is \$30.00 per hour (grade 12 AG specialist – Labor Bureau), then the annual cost to the Federal Government is \$99,000 (3,300 hours x \$30.00).

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

There is a program change decrease of -2,173 hours attributed to discontinuation of a program for lack of funding and discontinuation of two forms. Information from the forms is no longer necessary because they report the information in a validation system developed by NIFA.

There is an adjustment increase of 4,105 hours attributed to merging the burden of 0563-0066 into this revision renewal, an increase in applicants, and re-evaluating the per response time for the application. The final total of these two actions is an overall increase of 1,932 hours. See the separate spreadsheet for breakdown.

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

Information collected from agreement applications will not be published. Disclosure of information contained in the application package is subject to the Freedom of Information Act and the Privacy Act. RMA will publicize summary information of the applicants that receive funding.

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.

Not Applicable.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

18. B. Collection of Information Employing Statistical Methods:

Statistical methods will not be used since there will be no attempt to draw inferences about a population from the applications received.