Supporting Statement for Paperwork Reduction ActOffice of Emergency Management and Food Safety

Justification for Adding
CENTER OF EXCELLENCE FOR SCHOOL FOOD SAFETY RESEARCH
to 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.

On March 4, 2010, Secretary of Agriculture Thomas Vilsack announced that FNS will establish a Center of Excellence devoted to research on school food safety issues in FNS child nutrition programs. Research is needed in areas such as produce safety, proper cooling practices, evaluation of in-school food safety programs, and the containment of norovirus, which is the leading cause of foodborne illness in schools.

FNS is seeking a University to establish a Center of Excellence for School Food Safety Research. In order to find the university with the best capacity and interest in working with FNS, a competitive request for applications is necessary. Interested universities will prepare an application.

Legislative authority for this Center comes from Section 6(a)(3) of the Richard B. Russell National School Lunch Act, 42 U.S.C. 1755(a)(3); Section 1472(b) of the National Agriculture Research, Extension, and Teaching Policy Act of 1977, 7 U.S.C. 3318(b); P.L. 110-80, Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010.

FNS will post the Request for Application (RFA) package for the *Center of Excellence for School Food Safety* on its website on or about <u>April 1, 2010</u> at www.fns.usda.gov/fns/food_safety.htm and on www.grants.gov.

2. Purpose and Use of the Information.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant/cooperative agreement applications and recommend the University 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.

FNS will require each grantee to submit semi-annual and final Financial Status Report using SF- 425. The Recipient is required to enter the SF-425 reporting information into the Food Program Reporting System (FPRS) at www.fprs.fns.usda.gov. 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 quarter, with the last SF-425 serving as the final financial status report. There reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the cooperative agreement. Other Standard forms required SF-424, SF-424A, SF-424B, SF LLL are fillable and can be submitted online at www.grants.gov.

Other USDA Grant Certification Forms:

- AD-1047 Certification Regarding Debarment, Suspension, and Other Responsibility Matters;
- 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
- AD-1049 Certification Regarding Drug-Free Workplace Requirements.

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. Universities that choose to 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 anticipates that approximately 80 percent of applications will be submitted electronically, or 8 out of 10 universities.

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

There is no similar data collection effort available.

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 grantee. The consequence for not collecting the information is the inability to establish the Center of Excellence for School Food Safety Research, which will provide the scientific support for FNS educational programs.

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 and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act that requires that the Grantee provides release permission and is 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 ten (10) respondents will submit an application for the Center of Excellence. It is estimated that the average applicant will spend 80 hours developing their proposals. This is based on the general fact that applicants will have about two months to complete their proposals.

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

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
University	10	1	10	80	800

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

For the purpose of this burden estimate, FNS assumes that one (1) University will be awarded funds to establish the Center of Excellence. Post-award burden hours are based on the production of the quarterly and annual progress reports and financial reports that are submitted to FNS by the grantee selected for the project. FNS estimates that one University proposal will be selected for funding.

Action	Number Respondents	No. Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Quarterly					
Progress and	1	4	4	4	16
Financial	University				
Reports	selected				
Annual/Final	1	1	1	24	24
Report					
Total Hours	_	-	_	_	40

Pre-award burden 800 Post-award burden + $\underline{40}$ Total burden = 840

Respondents have a full range of discretion in how they design and develop their proposal.

FNS has provided guidance in the RFA on the evaluation criteria for proposals. 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 and annual progress reports and financial reports that are submitted to FNS by the grantee selected for the project. FNS estimates that one University proposal will be selected for funding.

A.12.3 Estimates of Annualized Cost to Respondents for Application

Type of Respondent	Number of Respondents	Burden Hours	Hourly Wage Rate	Total Respondent Cost
University	10	840	\$54	\$45,360

FNS estimates that each respondent will utilize at least one full time member at a cost of \$54 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 mean salary for an agricultural sciences post-secondary education teacher (http://www.bls.gov/oes/2008/may/oes_nat.htm#b25-0000), which was \$77,770. Post-secondary (college or university) faculty typically have 9 month appointments, making the mean hourly salary. Total Pre-award cost to the public is 800 hours x \$54 hourly wage = \$43,200. Pre-award costs are one time only costs. Total Post-award costs for routine reporting for the duration of the project for are 40 hours x \$54 = \$2,160. One time total annual cost is \$45,360.

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 \$800,000 based on the assumption of one (1) award.
- (2) FNS staffing costs, which are identified below.

The estimated cost to process and review applications is \$22,704. This is based on an estimate of a total of 44 hours of labor to process *each* application package. The estimate assumes an hourly cost per staff person 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, 30 hours total by 5 federal government scientists 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 10 applications will be received, it is anticipated that 440 hours will be needed to process and review these applications. Costs other than salary costs are negligible.

Total hours:	440 hours
Total Annualized Cost to the Federal Government:	
	\$22,704

15. Explanation for Program Changes or Adjustments

There are no changes in 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 applicant that receives grant funding at www.fns.usda.gov/fns/food_safety.htm.

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.