## Supporting Statement for Paperwork Reduction Act People's Garden School Pilot Program Grant

Justification for Adding
People's Garden School Pilot Program Grant
To the 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.

The Richard B. Russell National School Lunch Act (42 U.S.C. 1769(g) (3)) authorized the Secretary of Agriculture to make grants to eligible entities to develop and run, through eligible programs, community gardens at public schools where students qualifying for free and reduced price meals comprise at least 50 percent of school enrollment, and evaluate the impact of the program. Under the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010 (Public Law 111-080), Congress appropriated \$1 million for a pilot program in no more than five States.

FNS intends to competitively award one grant to a public entity and/or nonprofit organization to develop school gardens and evaluate the impact of the school garden pilot program. Each applicant will be required to submit a proposal to FNS describing the project, the proposed activities, 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 award. The information to be collected is not mandated by law or regulation.

FNS will post the Request for Application (RFA) package for the People's Garden School Pilot Program Grant on its website on or about (date contingent upon OMB approval). The RFA will also be posted on <a href="https://www.grants.gov">www.grants.gov</a>.

## 2. Purpose and Use of the Information.

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 grant/cooperative agreement applications and recommend the applicants 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.

#### 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 <a href="www.grants.gov">www.grants.gov</a> website. Additionally, applicants may apply for this opportunity directly through <a href="www.grants.gov">www.grants.gov</a>. Applicants may also submit their applications via e-mail. Applicants 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 faxed applications. Applicants may also submit their applications via e-mail.

FNS will require each grantee to submit semi-annual and final Financial Status Report using SF- 425 and SF-425A. The Recipient is required to enter the SF-425 reporting information into the Food Program Reporting System (FPRS) at <a href="www.fprs.fns.usda.gov">www.fprs.fns.usda.gov</a>. Standard forms required SF-424, SF-424A, SF-424B, SF-424C, SF-424D and SF LLL are fillable and can be submitted online at <a href="www.grants.gov">www.grants.gov</a>. All applications will be submitted electronically, either through <a href="www.grants.gov">www.grants.gov</a> or by email to FNS according to the instructions set out in the RFA. USDA Grant Certification Forms:

- 1. AD-1047 Certification Regarding Debarment, Suspension, and Other Responsibility Matters;
- 2. 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
- 3. AD-1049 Certification Regarding Drug-Free Workplace Requirements.

In addition a final report will be required.

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

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

#### 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. Reduced frequency is not possible as the annual frequency of applications coincides with the annual appropriation of funds. The consequence for not collecting the information is the inability to award grant funds for the development of school community gardens as stipulated in the Richard B. Russell National School Lunch Act.

## 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(s) 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 Grantee provides release permission and are 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 five respondents will submit an application for the school gardens pilot program grant. It is estimated that the average applicant will spend 40 hours designing and constructing their proposals. This is based on the general fact that applicants

will have about sixty days to complete their proposals.

A.12.1 Pre and Post-Award Estimate of Hours Burden on Respondents.

Type of Respondent and Activity	Estimated No. of Grant Applications (Responses)	Frequency of Response	Total Annual Responses	Estimated Time to Complete each Application	Total Estimated Burden Hours
Grantee (Not- for-Profit and Public agencies <i>Pre-award</i> )	5	1	5	40	200

Quarterly					
Progress and	1	4	4	6	24
Financial	Grantee selected				
Reports					
Final Report	1	1	1	160	160
(progress and					
financial Post-					
award)					
Total Hours			10		<u>384</u>

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

FNS intends to fund one eligible project with the \$1 million appropriated. The total estimated burden on the winning grantee of post award burden is reflected in the table above.

Total Pre-award cost to the public is 200 hours x \$38.33 hourly wage = \$7,966. Pre-award costs are one-time only costs.

Total Post-award annual costs for routine reporting are 184 hours x \$38.33 = \$7,052.72. Post award costs are annual costs for the duration of the project. (200 +184 = 384 total annual burden for this grant and the first year annual cost of \$14,865.40.

A.12.2 Estimates of Annualized Cost to Respondents for Application.

	Number of Respondents	Burden Hours	Frequency	Hourly	Total
Type of			of	Wage	Respondent
Respondent	Respondents		Response	Rate	Cost

Grantee	5	384	1	\$38.33	\$14,718.72

FNS estimates that each respondent (5) will utilize at least one full time member (for 40 hours at \$38.33 per hour) for a total cost of \$7,966. 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 <a href="http://www.bls.gov/bls/wages.htm">http://www.bls.gov/bls/wages.htm</a> website, and reflects average hourly wage for occupational code 19-3099, Social Scientists and Related Workers in the May 2008 National Occupational Employment and Wage Estimates.

Post-award burden hours are based on the production of the quarterly and final progress reports and financial reports that are submitted to FNS by the grantees selected for the project.

The progress 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. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant.

### 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 \$1 million based on the assumption that enough qualified applications will be received to use all of the appropriated funding. Actual award will depend on how many proposals are received and the merits of the proposals received.
- (2) FNS staffing costs, which are identified below.

The processing and reviewing of the applications is estimated to cost \$16,150.80. 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) and assumes that 5 applications will be received. It is estimated that a total of 313 hours including 11 hours of labor to process *each* application package will be needed. This labor estimate also includes 250 hours total by 10 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. Costs other than salary costs are negligible.

Total hours:	313 hours
Total Annualized Cost to	
the Federal Government:	\$16,150.80

## 15. Explanation for Program Changes or Adjustments.

There are no changes of 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 applicants that receive grant funding on the FNS website.

# 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.