

Supporting Statement for Paperwork Reduction Act
Office of Research and Analysis (ORA) Grants/Cooperative Agreements to Meet Food,
Nutrition and Health Needs of Program Eligible Participants

Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512

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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 Office of Research and Analysis (ORA) is funding a grants program to support the needs of Food and Nutrition Service (FNS) and to meet the food, nutrition and health needs of program eligible participants. It is anticipated that ORA will award approximately 3 grants/cooperative agreements per year with each grant having an estimated 5 sub-grantees. In FY 2011, FNS is funding 3 grant/cooperative agreement opportunities that are presented in Attachments 1 through 3:

- Attachment 1 – Establish University-Based Grants to Assess WIC Impacts on Periconceptional Nutrition
- Attachment 2 – Establish USDA Center for Collaborative Research on WIC Nutrition Education Innovations
- Attachment 3 – The WIC Research Information Network

The Authority for this program is contained in the Child Nutrition Act of 1966 Section 17 (g) (5) as amended (http://www.fns.usda.gov/cnd/governance/Legislation/CNA_1966_12-13-10.pdf) and Section 1472 of the National Agriculture Research, Extension, and Teaching Policy Act of 1977, 7 U.S.C. 3318, codified at 7 CFR 2.19(a)(3)(x) in January 2009 Under this program, subject to the availability of funds, the Secretary of Agriculture may award competitive grants and cooperative agreements for the support of research projects to further USDA food and nutrition assistance programs.

The above grant/cooperative agreements being offered in FY 2011 involve researcher-initiated projects to demonstrate creative approaches to evaluate or develop aspects of The Special Supplemental Nutrition Program for Women, Infants and Children (WIC), coordinate activities among researchers and widely disseminate findings.

WIC was established to counteract the negative effects of poverty and nutritional risk on prenatal and pediatric health and provides a combination of direct nutritional supplementation, nutrition education and counseling, and increased access to health care and social service providers for pregnant, breastfeeding, and postpartum women; infants; and children up to the age of five years. Low-income is defined in terms of a household income at or below 185 percent of poverty. States, U.S. territories and Indian Tribal Organizations receive Federal grants which are used to cover the cost of foods purchased with WIC benefits, along with specified nutrition services and administrative costs.

Average WIC monthly participation in 2010 was 9.2 million, up from 8.0 million in 2005. Children ages 1 to 4 years comprise about 1/2 of WIC participants, while women and infants

each are about 1/4 of participants. Currently, WIC serves half of the infants in the United States and roughly one third of mothers in their prenatal period. Over half of the pregnant women participating in WIC enroll in their first trimester.

The substances of the 3 WIC-related grant opportunities for FY 2011 are described in Attachments 1 through 3. Institutions can bid on more than one of the attachments if desired.

The grantees and recipients will work cooperatively with FNS to:

- Support researcher-initiated projects that use a common approach to reporting findings to ensure transparency and facilitate a meta-analysis of all projects;
- Coordinate activities among researchers;
- Effectively use technology and digital media to achieve desired outcomes; and
- Advance communication and coordination to improve target behaviors.

The recipients of the grants and cooperative agreements will be required to demonstrate a thorough understanding of FNS programs and the food, nutrition and health issues facing eligible participants of FNS nutrition assistance programs.

FNS will post a Request for Application (RFA) package for the "Administer Researcher-Initiated Grants for Research on the WIC Program" on its website on or about **June 1, 2011**. The RFA will also be posted on www.grants.gov.

2. Indicate how, by whom, how frequently, 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 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. In addition, the findings and outcomes would assist WIC agencies by coordinating activities among researchers and widely disseminate findings, which would ultimately result in assisting the WIC participants. The selection criteria are contained in the RFA package. This process will occur only once this year. How data will be collected:

In preparing the proposal, applicants are urged to ensure that the name of the Principal Investigator and the name of the submitting institution are included on the Application for Federal Assistance SF-424 (R&R Family) forms.

The following grants.gov forms are required of grant applicants, which are located at http://www.grants.gov/agencies/aforms_repository_information.jsp: Grants.gov Forms:

- SF424 (R&R) Form
- Research and Related Other Project
- Research and Related Senior/Key Person Profile (Expanded)
- Research & Related Budget
- Research & Related Senior/Key Person Profile

- Research & Related Personal Data
- Project/Performance Site Location(s)
- HHS Checklist (08-2007) [E.O. 12372, only applicable to participating states]
- Assurances for Non-Construction Programs (SF-424B)
- AD-1047 Certification Regarding Debarment, Suspension
- AD-1048 Certification Regarding Debarment, Suspension (Lower Tier contractual budget line)
- SF-LLL Disclosure of Lobbying Activities

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.**

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 must apply for this opportunity directly through www.grants.gov. FNS will not accept e-mailed, faxed or paper-delivered applications.

FNS estimates approximately, 100% of these responses will report electronically Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There is no similar data collection effort available. This program solicitation is new and unique. There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS is in search for innovated research projects to assist the WIC population.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information request is held to the minimum amount required. Information being requested or required has been held to the minimum required for the intended use. Circumstances limit the flexibility in modifying the reporting requirements. FNS estimates that one percent of our respondents are small entities.

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.

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 support FNS programs and the food, nutrition and health needs of program eligible participants.

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

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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**
- **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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

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, or reporting form, and on the data elements to be recorded, disclosed, or reported

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.

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 cash payments or gifts to respondents.

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

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 the grants after award. 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. 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 this data collection.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

FNS estimates 4 applicants will annually apply for each grant/cooperative agreement specified in Attachment 1 through 3 with a total estimate of 12 respondents. It is estimated that the average applicant will spend 50 hours designing and constructing their proposals. This is based on the general fact that applicants will have about thirty days to complete their proposals.

FNS estimates 15 applicants will yearly submit an application for a sub-grantee award for each of the 3 grant/cooperative agreements awarded for a total estimate of 45 respondents as sub-grantees. It is estimated that the average sub-grantee applicant will spend 40 hours designing and constructing their proposals. This is based on the general fact that applicants will have about forty-five days to complete their proposals.

A.12.1 Estimate of Hours Burden on Applicants for the Recipient Grantee and Sub-Grantees.

| Type of Respondent | Estimated No. of Grant Applications (Respondents) | Frequency of Response | Total Annual Responses | Estimated Time to Complete each Application | Total Estimated Burden Hours |
|---|---|------------------------------|-------------------------------|--|-------------------------------------|
| Recipient Grantee (Not-for-Profit agencies) | 12 | 1 | 12 | 50 Hr. | 600 |
| Sub-Grantees (Not-for-Profit agencies) | 45 | 1 | 45 | 40 Hr. | 1,800 |
| Total | 57 | 1 | 57 | | 2,400 |

Hourly estimates identified above are used as the basis for determining total annual cost burden to applicants for the recipient grantee to be awarded by FNS and the sub-grantees to be awarded.

A.12.3 Estimates of Annualized Cost to Recipient Grantee and Sub-Grantees for Application.

| Type of Respondent | Number of Respondents | Average Time per Response (hours) | Frequency of Response | Hourly Wage Rate | Total Respondent Cost |
|---------------------------|------------------------------|--|------------------------------|-------------------------|------------------------------|
| Recipient Grantee | 12 | 50 | 1 | \$23.81 | \$14,286 |
| Sub-Grantees | 45 | 40 | 1 | \$23.81 | \$42,858 |
| Total | 57 | | 1 | | \$57,144 |

FNS estimates that each respondent will utilize at least one full time member at a cost of \$23.81 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 <http://www.bls.gov/bls/wages.htm> website, and reflects mean average hourly rate for occupation code 25-0000, Education, Training and Library occupations in the May 2008 National Occupational Employment and Wage Estimates.

A.12.4

Post-award burden hours are based on the production of the quarterly, annual, and final progress reports and financial reports that are anticipated to be submitted to FNS by the Recipient grantee and the sub-grantees selected for the project. FNS estimates for each grant/cooperative agreement awarded that 1 recipient grantee will be selected to establish and manage a center and 5 sub-grantees will be selected.

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. 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.

For the purpose of this burden estimate, FNS assumes that a total of 6 grantees (1 - recipient grantee and 5 sub-grantees) per Attachment will be awarded funds.

The total estimated post award burden for 3 grant/cooperative agreements awarded per year and 5 sub-grantees (total of 18 respondents - 3 recipient grantees and 15 sub-grantees) is reflected in the following table:

A.12.5 Estimates of Other Total Annual Cost Burden to Respondents.

| Action | Number Respondents | Number Annual Response | Total Annual Response | Hours per Response | Total Annual Burden |
|--|--------------------|------------------------|-----------------------|--------------------|---------------------|
| Quarterly Progress and Financial Reports | 18 | 4 | 72 | 2 | 144 |
| Annual Report | 18 | 1 | 18 | 40 | 720 |
| Final Report (progress and financial) | 18 | 1 | 18 | 20 | 360 |
| Total Hours | 18 | - | 108 | - | 1,224 |

| Total | # of Hours | Rate | Cost |
|----------------------|------------|---------|-------------|
| Pre-Award | 2,400 | \$23.81 | \$57,144.00 |
| Post-Award Reporting | 1,224 | \$23.81 | \$29,143.44 |
| Total | 3,624 | | \$86,287.44 |

Total Pre-award cost to the public is 2,400 hours x \$23.81 hourly wage for a total of \$57,144. Pre-award costs are one-time only costs.

Total Post-award annual costs for routine reporting are 1,224 hours x \$23.81 for a total of \$29,143.44. Post award costs are annual costs for the duration of the project.

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. Also, 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.**

Costs are estimated for two categories:

- (1) Grant costs are expected to total \$3 million. Actual awards will be equal to or less, depending on how many grants are funded on a competitive basis and the merits of the proposals received.

(2) FNS staffing costs, which are identified below.

The processing and reviewing the applications is estimated to cost \$13,003.20. This is based on an estimate of a total of 21 hours of labor to process *each* Recipient grantee application package. The estimate assumes an hourly cost per staff persons of \$51.60 per hour (the average salary for GS-13 grade level including overhead and benefits). This labor estimate includes 8 hours (2 hours/application package) by grants management staff to process all applications in an application package, 18 hours total by 3 FNS staff to conduct a thorough technical review for each of the 4 anticipated applications, and 4 hours by the panel chairperson to document the technical reviews and prepare the recommendations for award (1 hour per application). Assuming 4 applications will be received, it is anticipated that 252 hours will be needed to process and review all applications. Costs other than salary costs are negligible.

| # of Grants | # of Applicants | TEP Members (3) | TEP Chairman Summary | Grants | Total |
|-------------|-----------------|------------------|----------------------|-----------------|-------------|
| 3 | 4 | 18 Hrs. /Applic. | 1 Hr. /Applic. | 2 Hrs. /Applic. | 252 Hrs. |
| Cost | | | | x \$51.60/Hr. | \$13,003.20 |

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is the first OMB submission for this program. This is a revision of a currently approved collection as a result of program changes FNS will add 3,624 burden hours to our inventory.

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

FNS will publicize summary information of the applicants that receive grant funding on the FNS website. www.fns.usda.gov

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 plans to display the expiration date for OMB approval of the information collection on all instruments.

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

There are no exceptions to the certification statement.