

**Supporting Statement for Paperwork Reduction Act
Special Nutrition Programs**

Justification for Adding

FARM TO SCHOOL GRANT PROGRAM

**List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512**

- 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 Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended Section 18 of the Richard B. Russell National School Lunch Act (NSLA) to establish a Farm to School program in order to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve access to local foods in eligible schools.

To fulfill the farm to school mandate in the HHFKA, effective October 1, 2012, \$5 million will be provided to the United States Department of Agriculture (USDA) on an annual basis to support grants, technical assistance, and the Federal administrative costs related to USDA's farm to school program. The USDA Food & Nutrition Service (FNS) is charged with implementing this new competitive grants program and intends to solicit applications for farm to school Planning grants and Implementation grants. In order to select the most

appropriate grantees, a competitive request for applications is necessary. Eligible entities will prepare an application.

FNS will post the Request for Application (RFA) package for the *Farm to School Grant Program* on its website on or about April 16, 2012 at <http://www.fns.usda.gov/cnd/f2s/> and on www.grants.gov.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

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 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.

The following grants.gov forms are required of grant applicants. They are located at http://www.grants.gov/agencies/aforms_repository_information.jsp: Click Active Forms.

Non-Construction Grant Projects Forms: SF-424 Family

1. Application and Instruction for Federal Assistance (SF424)
2. Budget Information and Instruction (SF-424A)
3. Assurance-Non-Construction Programs (SF-424B)

The following required OMB form can be obtained at:

<http://www.whitehouse.gov/sites/default/files/omb/grants/sflllin.pdf>

SF LLL (Disclosure of Lobbying Activities): Indicate on the form whether your organization intends to conduct lobbying activities. If your organization does not intend to lobby, write **“Not Applicable.”**

In addition, applicants awarded a grant will be required to submit either on a quarterly or semi-annual basis, depending on the type of award (planning or implementation) the following form (http://www.whitehouse.gov/omb/grants_forms/):

SF-425, Federal Financial Report

- 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. 100% of applicants will apply for this opportunity directly through www.grants.gov. FNS will not accept emailed faxed, or hand delivered applications.

FNS estimates that approximately 75% of the grant awardees will report financial data electronically through FNS' 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 purposes described in Question 2.

There is no similar data collection effort available. This program solicitation is new and unique. 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 solely administers the school meal programs. The information required for this study is not currently reported to State Agencies on a regular basis in a standardized form.

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 information request is held to the minimum amount required. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Circumstances limit the flexibility in modifying the reporting and recordkeeping requirements. FNS estimates that 25 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 grantees. The consequence for not collecting the information is the inability to establish the Farm to School Grant Program as mandated by Congress in the HHFKA.

- 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, 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**

recordkeeping, 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 years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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. Explain any decision to provide any payment or gift to respondents, other than re-
enumeration 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 application 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.

Grantees who are awarded an Implementation Grant will be required to submit the SF 425 forms. The grantees awarded Planning Grants will submit the SF-425 in a hard copy. All of the SF-425 forms are stored in a secured database. Therefore, Implementation grant awardees must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business with the Food and Nutrition Service. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases.

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. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A) 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.

B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

FNS estimates that approximately seven hundred (700) respondents will submit an application for the Farm to School Grant Program. It is estimated that the average applicant will spend 60 hours developing their proposals. This is based on the general fact that applicants will have about six weeks to complete their proposals. We expect school district and schools will represent the vast majority of submissions, while other eligible entities, noted below, will constitute the remaining submissions.

A.12.1 Estimate of Hours Burden on Respondents for Application (Affected Public: State, Local, and Tribal Agencies; Business – non-profit and for-profit) Pre-Award Burden

Affect Public	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
State, Local & Tribal Organizations	School or School District	500	1	500	60	30000
	State or local agency	75	1	75	60	4500
	Indian Tribal Organization	25	1	25	60	1500
Business: non-profit &	Non- profit organization	50	1	50	60	3000
	Producer Group	50	1	50	60	3000
Total Burden		700		700		42,000

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. Pre-Award hourly estimates identified above are used as the basis for determining total annual cost burden to respondents of the application.

In the case of Planning grants, post-award burden hours are based on the production of one time semi-annual progress and financial report, and in the case of Implementation grants, post-award burden hours are based on the production of quarterly progress and financial reports that are submitted to FNS by the grantee selected for the project. Financial reports submitted use the SF-425. Implementation grants may range from 1 – 2 years as determined by individual grantees. For the purposes of this estimate, we assume the average Implementation grant will be 18 months in duration and thus the grantee will submit 5 quarterly progress and financial reports.

These progress reports will ask for a description of the activities that took place during the previous period 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 period, 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 or cooperative agreement.

For the purpose of this burden estimate, FNS assumes that awardees will spend 2 hours in preparing reports and .25 hours per instance in recordkeeping burden to maintain the documents necessary to support the reports.

No more than 25 Planning grant proposals and 40 Implementation grant proposals will be selected for funding. The total estimated burden on awardees in both categories is reflected in the following table:

A.12.2 Estimate of Hours Burden on Respondents for Application (Affected Public: State, Local and Tribal Agencies; Business-for-not-for-profit) Post-Awardee Burden Estimates

Action	Number Respondents	No. Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Planning Grants					
Semi-Annual Progress and Financial Report (1) and Annual/Final Report (1)	25	2	50	2.25	112.50
Implementation Grants					

Quarterly Progress and Financial Reports (5) and Annual/Final Report (1)	40	6	240	2.25	540.00
Total	65	-	-	-	652.50

A.12.3 Estimates of Annualized Cost to Respondents for Application

Affected Public	Type of Respondent	Number of Respondents	Average Time per Response (hours)	Frequency of Response	Hourly Wage Rate	Total Respondent Cost
State, Local & Tribal Agencies	School or School District	500	60	1	\$26.44	\$793,200
	Indian Tribal Organization	25	60	1	\$26.44	\$39,660
	State or local agency	75	60	1	\$26.44	\$118,980
Business-for-not-for-profit	Producer Group	50	60	1	\$26.44	\$79,320

	Non-profit organization	50	60	1	\$26.44	\$79,320
Total Burden	TOTAL	700				\$1,110,480

FNS estimates that each respondent will utilize at least one full time member at a cost of \$26.44 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable. Total Pre-award cost to the public was calculated by estimating 700 applicants will spend approximately 60 hours each at \$26.44 hourly wage = \$1,110,480. Pre-award costs are one time only costs. Wage rates were determined using <http://www.bls.gov/bls/wages.htm> website.

Total Post-award costs for routine reporting are 652.50 hours x \$26.44 = \$17,252.10.

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 questions 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.

Costs are estimated for two categories:

- (1) The annualized costs for awarding and managing this grant program are expected to total about \$679,280 based on the assumption that we will award 65 grants.
- (2) FNS staffing costs, which are identified below.

The estimated cost to process and review applications is \$679,280. This is based on an estimate of a total of 20 hours of labor to process and review *each* application package. The estimate assumes an hourly cost per staff person of \$48.52 per hour (the average salary for GS-13 grade level including overhead and benefits). This labor estimate includes 2 hours by grants management and program staff to process an application, 15 hours total by 3 employees (including both Federal and non-Federal employees) to conduct a thorough technical review of each application, and 3 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award. Assuming 700 applications will be received, it is anticipated that 14,000 hours will be needed to process and review these applications. Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2012, for a GS 13, Step 5 employee.

Total hours:	14,000 hours
Total Annualized Cost to the Federal Government:	\$679,280

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

There are no changes in the information collection since the last OMB approval.

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 applicant that receives grant funding at

<http://www.fns.usda.gov/cnd/f2s/>.

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 of the OMB
83-I" Certification for Paperwork Reduction Act."**

There are no exceptions to the certification statement.