

**Supporting Statement for Paperwork Reduction Act
Special Nutrition Programs (SNP)**

**Justification for Adding
School Wellness Policy Cooperative Agreement
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 United States Department of Agriculture Food and Nutrition Service (hereafter USDA FNS) is responsible for providing nutritious meals to children through the National School Lunch Program (NSLP) and the School Breakfast Program (SBP), among others, and for monitoring compliance with 2010's Healthy, Hunger-Free Kids Act (HHFKA) as described in more detail in Section II: Background. USDA FNS hereby announces the availability of funds and opportunities to conduct comprehensive school wellness policy surveillance at multiple levels, including state- and school district-levels. The funds will support public or private, non-governmental research institutions (such as accredited institutions of higher education and/or non-profit organizations) to enter into a cooperative agreement with USDA FNS for school wellness policy surveillance, research, and reporting that complement other national existing school wellness policy

surveillance systems and assist the USDA in fulfilling its Congressional monitoring and surveillance mandate, as delineated in the HHFKA. The purpose of this announcement, therefore, is to describe the new opportunity and solicit proposals to support these aims. 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 *School Wellness Policy Cooperative Agreement* on its website on or about July 1, 2014 at <http://www.fns.usda.gov/cnd> 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 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 during fiscal year 2014.

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.

- (B) Research and Related Forms: R&R Family
 1. Research & Related Application (SF-424)

2. Assurance for Non-Construction Programs (SF-424B)
3. R&R FedNonFed Budget; [R&R Sub-award Budget Attachment(s)Form, if applicable]

- SF LLL (Disclosure of Lobbying Activities)

The required OMB form can be obtained at the following website:

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

In addition, the applicant must submit the following Departmental Forms:

In lieu of submitting AD-1047 and 1048, users will adhere to the Terms and Conditions to follow these regulations.

- AD-1047 Certification Regarding Debarment, Suspension
- AD-1048 Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transactions
- AD-1049 Certificate Regarding Drug Free Workplace Requirements Alternative 1
(Note that there is a version of this form for Individuals: AD-1050 and a version for State Agencies: AD-1052)

These forms are at the USDA Forms site: <http://www.ocio.usda.gov/policy-directives-records-forms/forms-management/approved-computer-generated-forms>.

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 the 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. All applicants will apply for this opportunity directly through www.grants.gov. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% 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.

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

The information requested 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 since eligible applicants for this RFA is limited to public or private, non-governmental research institutions.

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. This includes information of applicant's existing infrastructure and security policies to perform program objectives. The consequence for not collecting the information is the inability to establish which proposal meets program objectives while adhering to data privacy per the Food and Nutrition Act of 2008.

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 July 27, 2012, (Volume 77, Number 145, page 44210-44212) 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 regarding where online details on FNS grant recipients, grant purpose, accomplishments and period of performance were located by requested by the writer. FNS prepared a written response to the commenting party.

FNS staff often discuss 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 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 privacy. 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 the Grantee to release permission and is informed of the use of the information.

Grantees who are awarded a grant under this RFA will be required to submit the SF-425 forms. All of the SF-425 forms are stored in a secured database. Therefore, 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 ten (10) respondents will submit an application for the *School Wellness Policy Cooperative Agreement*. It is estimated that the average applicant will spend 40 hours developing their proposal. This is based on the general fact that applicants will have about four weeks to complete their proposals. However, public or private, non-governmental research institutions are eligible to submit a final proposal for this RFA.

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Burden

Affected Public	Estimated No. of Respondents	Frequency per Respondent	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
Non-governmental research institutions	10	1	10	40	400
Total Burden	10	1	10	40	400

Respondents have a full range of discretion in how they design and develop their proposal. FNS has provided guidance in the RFA on required items and 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.

The post-award burden hours are based on the production of quarterly progress reports that are submitted to FNS by the grantee selected for the project. Grant activities are expected to last for three years. In addition to the quarterly reports, the grantee will submit a final written report and conduct a final briefing at FNS Headquarters in Alexandria, VA.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties.

For the purpose of this burden estimate, FNS assumes that the awardee will spend two (2) hours in preparing reports and .25 hours per instance in recordkeeping burden to maintain the documents necessary to support the reports. One grant will be awarded under this RFA. The total estimated burden is reflected in the following table:

A.12.2 Estimate of Hours Burden on Respondents for Application (Affected Public: State and Local Agencies) Post-Awardees Burden Estimates

Instrument	Number Respondents	Frequency per Respondents	Total Annual Response	Hours per Response	Total Annual Burden
Quarterly Reports	1	4	4	2.25	9
Final Written Report	1	1	1	10	10
Final Briefing	1	1	1	10	10

Total	1	6	6	4.8333	29
--------------	----------	----------	----------	---------------	-----------

Post Award Burden Summary

Number of Respondents: 1

Responses per respondent: 6

Total Annual Response: 6

Hours per Response: 4.8333

Total Burden Hours: 29

Pre-and Post Award Reporting Burden Summary:

Number of Respondents: 10

Responses per respondent: 1.6

Total Annual Response: 16

Hours per Response: 26.8125

Total Burden Hours: 429

A.12.2a. Estimate Post-Award Recordkeeping Burden Hours on Respondents for Application (Affected Public: State and Local Agencies)

Recordkeeping – The Grantee selected in connection with this Request for Applications will be required to maintain quarterly Progress and Financial Status Reports (SF-425).

There is no recordkeeping involved with the final briefing to FNS.

Action	Number Respondents	No. Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
Quarterly Progress and Financial Reports (SF-425)	1	4	4	.1169	0.4676
Annual/Final Report	1	1	1	.1169	0.1169
TOTAL STATE, LOCAL & TRIBAL GOVERNEMENTS	1	N/A	5	N/A	0.5845

Post Award Recordkeeping Burden Summary:

Number of Respondents: 1

Responses per respondent: 5

Total Annual Response: 5

Hours per Response: .1169

Total Recordkeeping Burden Hours: 0.5845

The estimated total annual reporting 429 + total recordkeeping burden hours: 0.5845

=429.5845 (rounded up to 430) total annual burden hours; total annual reporting responses 16 + total recordkeeping responses 5 = 21 total overall annual responses.

A.12.3 Estimates of Pre and Post Annualized Cost to Respondents for Application

Affected Public	Type of Respondent	Number of Respondents	Frequency of Response	Estimated Total Annual Responses	Average Time per Response (hours)	Estimated Total Annual Burden hours	Hourly Wage Rate	Total Respondent Cost
Pre-Award Non-governmental research institutions	University Researcher	10	1	10	40	400	\$28.97	\$11,588.00
Post Award Non-governmental	University Researcher	1	6	6	4.8333	29	\$28.97	\$840.00

research institutions								
Post Award Non-governmental research institutions recordkeeping	University Reseacher	1	5	5	.1169	0.5845	\$28.97	\$16.93
Total Burden		10	-	21	-	429.58	\$28.97	\$12,444.93

The total annual cost to respondents is \$12,444.93. FNS estimates that most respondents will utilize at least one full time member at a cost of \$28.97 per hour. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for Social Scientists and Related Workers, All Others - Occupation Code 19-3099 (according to the Bureau of Labor Statistics, Occupational Employment Wages May 2011).

The total Pre-award costs were determined by adding the total number of applicants times the total number of hours times the total hourly costs or as follows: $10 \text{ (number of applicants)} \times 40 \text{ hours} \times \$28.97 = \$11,588.00$

Pre-award costs are determined to total \$11,588. 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 $29 \text{ hours} \times \$28.97 = \$840.13$.

This amount is based on awarding one grant. Post award costs are annual costs for the duration of the project (3 years).

Total Post-award costs for routine recordkeeping cost for the SF 425 is estimated at \$16.93 annually.

- 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.

The estimated pre-award cost to process and review applications is \$9,670.00. This is based on an estimate of 20 hours of labor to process and review *each* application package.

The estimate assumes an hourly cost per staff person of \$48.35 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 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. It is estimated that 10 applications will be received, and thus 200 hours will be needed to process and review these applications.

For the one proposal anticipated to be awarded, Federal labor costs will total \$1,934.00.

This is based on approximately 25 hours spent providing technical assistance and 15 hours reviewing the 5 program reports (progress reports (4) and final report (1)) for the grantee, for a total of 40 hours.

(25 hours +15 hours= 40 hours X 1 grantee X \$48.35per hour = \$1,934.00). 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 Annualized Pre-Award Cost to the Government	\$9,670.00
Total Annualized Post Award Cost to the Government	\$1,934.00
Total Annualized Cost to the Federal Government	\$11,604.00

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

This Generic Information Collection will reduce the available responses from OMB Control Number 0584-0512; Expiration 10/30/2012 by 21 and the hours by 430.

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/>

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that this 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.