

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

Justification for Adding

Direct Certification Improvement Grants

**To the 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 Child Nutrition and WIC Reauthorization Act of 2004, Public Law 108-265, required all local educational agencies (LEAs) to establish, by school year (SY) 2008-2009, a system to directly certify children as eligible for free school meals when they are members of households that receive SNAP benefits. Under direct certification, children are approved for school meal benefits automatically without an application from the child's household. Direct certification normally is accomplished through data matching between school enrollment records and public assistance program eligibility records.

The Food, Conservation, and Energy Act of 2008 (2008 Farm Bill, P.L.110-246) required FNS to assess the effectiveness of State and local efforts to directly certify children for free school meals when they are members of households receiving SNAP,

and to provide annual reports to Congress indicating State progress in this area. Each year since 2008, FNS has computed direct certification rates for each State using estimates of the number of school-age SNAP participants (between ages 5 and 17) and the number of children from SNAP households directly certified as eligible for free school meals. These rates have been published in the annual Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress*. The national average direct certification rate for children in SNAP households for SY 2013-2014 was calculated as 87 percent, a decrease of 2 percentage points from the 89 percent reported for the previous school year. The Reports to Congress for 2008 through 2013 are available at: <http://www.fns.usda.gov/ora/menu/Published/CNP/cnp.htm>.

Section 749(h) of the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2010 (P.L. 111-80) provided \$22 million that the Food and Nutrition Service (FNS) must issue as grants to State agencies that administer the NSLP and have the lowest rates of children directly certified for free meals, for the purpose of improving those rates. State agencies may use grant funds, in accordance with FNS requirements, to pay costs associated with improving their direct certification rates. Under this appropriation, in July 2010, FNS announced an RFA for State agencies to apply for Direct Certification planning and implementation grants. Applications in response to the 2010 RFA were accepted on a quarterly basis from November 2010 through July 2014 and FNS has awarded 44 grants to State agencies. FNS is extending another Direct Certification Improvement Grant opportunity to States to make available the remaining funds.

The purpose of the Direct Certification Improvement Grants described in this RFA is to fund State agency activities in planning and implementing direct certification improvement projects that will help them reach and maintain the direct certification rate benchmarks mandated by the HHFKA.

In addition, the grants are intended to fund improvements in direct certification with other public programs where there is statutory authority for direct certification, such as Temporary Assistance to Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), foster care, migrants, homeless, etc. FNS intends for the grants to assist States in improving access, increasing accuracy, and reducing paperwork in the NSLP and SBP by simplifying the certification process for free school meals.

Grant funds are subject to availability of federal funds. FNS reserves the right to close this RFA at any time that available funds are exhausted. Grant awards under this RFA will not be competitive as long as sufficient funding is available to fund all fully responsive applications with potential to significantly improve direct certification performance. FNS will accept only one grant application from any State agency in response to the RFA. All grant funds must be obligated and all program activities under the grant (other than activities relating to the close out of the grant) must be completed by the end of award period. The Request for Application (RFA) package for the *Direct Certification Improvement Grants* may be downloaded from the USDA FNS website at <http://www.fns.usda.gov/school-meals/grants> 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 systematically review and approve the grant. This process will occur six times during fiscal years 2015 and fiscal year 2016.

The following grants.gov forms are required of grant applicants. They can be obtained at <http://www.grants.gov/web/grants/forms.html>.

- Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF-424)
 2. Budget Information - Non-Construction Programs (SF-424A)
 3. Assurances - Non-Construction Programs (SF-424B)
 4. Federal Financial Report (SF-425)
 5. SF LLL - Disclosure of Lobbying Activities (This form can be obtained at the following website:
<http://www.whitehouse.gov/sites/default/files/omb/grants/sflllin.pdf>.)
- As a condition of award, selected applicants are required to comply with the requirements of 2 CFR Part 421: Requirements for Drug-Free Workplace (Financial Assistance).
- In addition, selected applicants are agree to ensure that all sub-recipients are neither excluded nor disqualified under the Suspension and Debarment rules found at 7 CFR sec. 3017.300 by doing any one of the following:
 1. Checking the System for Awards Management (SAM). This information can be found at www.sam.gov.
 2. Collecting a certification that the entity is neither excluded nor disqualified. Because a Federal certification form is no longer available, the Grantee or sub-Grantee electing this must devise its own.

3. Including a clause to this effect in the sub-recipient agreement and in any procurement contract expected to equal or exceed \$25,000, awarded by the Recipient or a sub-recipient within any agreements.

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 using the SF-425 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 will solely administer the *Direct Certification Improvement Grants*.

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 are limited to State agencies that administer the National School Lunch Program.

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 and to ensure program integrity after grant is awarded. The consequence for not collecting the information is the inability to establish which proposals meet 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 twelve (12) respondents will submit an application for the *Direct Certification Improvement Grants*. It is estimated that the average applicant will spend 40 hours developing their proposal (including submission of the aforementioned forms). There will be four application deadlines in the fiscal year, anticipating three applicants for each .

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Burden

FNS has provided guidance in the RFA on required items for proposals. Pre-award hourly estimates are used as the basis for determining total annual cost burden to respondents of the application.

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
State agencies	12	1	12	40	480
Total Burden	12	1	12	40	480

Pre-Award Burden Summary:

Number of Respondents: 12

Responses per respondent: 1

Total Annual Response: 12

Hours per Response: 40

Total Burden Hours: 480

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

The post-award burden hours are based on the production of quarterly progress reports, quarterly financial reports (using the SF-425), and a final report.

The 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 use the SF-425 for reporting financial status for the previous period with the final 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. FNS estimates that up to 12 grants will be awarded under this RFA. The total estimated reporting burden is reflected in the following table:

Affected Public	Instrument	Number Respondents	Number Annual Response	Total Annual Response	Hours per Response	Total Annual Burden
State agencies	SF-424 Application	12	1	12	1	12
	SF-424A Budget	12	1	12	10	120
	SF-424B Assurances	12	1	12	.25	3
	Disclosure of Lobbying Activities SF-LLL	12	1	12	.50	6
	SF-425 Financial Reporting (Quarterly)	12	4	48	1.50	72
	SF-425 Final Report	12	1	12	10	120
	Total		12	9	9108	3.08

Post Award Reporting Burden Summary:

Number of Respondents: 12

Responses per respondent: 9

Total Annual Response: 108

Hours per Response: 3.083

Total Burden Hours: 333

Pre-and Post Award Reporting Burden Summary:

Number of Respondents: 12

Responses per respondent: 10

Total Annual Response: 120

| Hours per Response: 4.2756.775

| Total Burden Hours: 513813

A.12.3 Post-Awardees Recordkeeping Burden Estimates Estimate of Hours Burden on Respondents for Application (Affected Public: State agencies)

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cx)	(f) Hours Per Recordkeeper	(g) Total Burden (ex)
State Agencies	RECORDKEEPING					
	SF-425 Final Report	12	1	12	0.05	0.6
	SF-424	12	1	12	0.05	0.6
	SF-424 A	12	1	12	0.05	0.6
	SF-424 B	12	1	12	0.075	0.9
	SF-LLL	12	1	12	0.10	1.2
	SF-425 Quarterly Financial Reporting	12	4	48	0.125	6.0
Post Award Recordkeeping Total Burden Estimates		12	-	108	-	9.9

Post Award Recordkeeping Burden Summary:

Number of Respondents: 12

Responses per respondent: 9

Total Annual Response: 108

Hours per Response: 0.09167

Total Burden Hours: 9.9

The total estimated burden hours for pre & post-award reporting and post award recordkeeping is 822.9 hours rounded up to 823 (pre-award 480 burden hours + 333 post-award + 9.9 recordkeeping burden hours). The total estimated number of responses for pre & post reporting and recordkeeping is 228 total annual responses (pre-award 12 responses +

post-award responses 108 and post award recordkeeping response 108).

A.12.4 Estimates of 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
State agencies	Pre-Award Reporting	12	1	12	40	480	\$31.61	\$15,172.80
	Post-Award Reporting	12	9	108	3.083	333	\$31.61	\$10,526.13
	Post-Award Recordkeeping	12	9	108	0.09167	9.9	\$31.61	\$312.94
Total Burden		12	-	228	-	822.9	\$31.61	\$26,011.87

The total estimated annual cost to respondents is \$26,011.87. FNS estimates that most respondents will utilize at least one full time member at a cost of \$31.61 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 and Community Service Managers - Occupation Code 11-9151 (according to the Bureau of Labor Statistics, Occupational Employment

Wages May 2013). Wage rates were determined using <http://www.bls.gov/bls/wages.htm> website.

- 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 total annualized cost to the Federal Government is \$23,438.40.

The estimated pre-award cost to process and review applications is \$11,719.20. This is based on an estimate of 20 hours of labor to process and review *each* application package. Twelve applications are estimated to be received resulting in 240 hours needed to process and review these applications. The estimate assumes an hourly cost per staff person of \$48.83 per hour (wage rate determined based on the Office of Personnel management salary table for FY 2014 for a GS-13, step 5 employee in the Washington, DC area). The 20 hours of 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.

The estimated post-award cost is \$11,719.20. This was determined by anticipating that 12 proposals will be awarded with 5 hours providing technical assistance and 15 hours reviewing the program and financial reports produced by each grantee, for a total of 20 hours (12 grantees x 20 hours x \$48.83 per hour = \$11,719.20). Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2014, for a GS 13, Step 5 employee in the Washington, DC area.

Total Annualized Pre-Award Cost to the Government	\$11,719.20
Total Annualized Post Award Cost to the Government	\$11,719.20
Total Annualized Cost to the Federal Government	\$23,438.40

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

This request will reduce the available burden on generic 0584-0512 by 823 burden hours and 228 total annual responses.

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

There are no plans for tabulation and publication of this information collection.

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.