
**Supporting Statement for Paperwork Reduction Act
Supplemental Nutrition Assistance Program (SNAP)**

Justification for Adding

**Farmers' Market SNAP Support 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 Food and Nutrition Service (FNS) administers the nutrition assistance programs of the United States Department of Agriculture (USDA). Among these nutrition assistance programs is the Supplemental Nutrition Assistance Program (SNAP).

USDA is committed to supporting local food systems and expanding SNAP participants' access to healthy foods. Therefore, USDA has made it a priority to help more farmers' markets become SNAP-authorized, and to maintain their participation in the program.

The Food and Nutrition Service: 2014, Explanatory Notes, the President's budget for FNS for Fiscal Year (FY) 2014, provided \$4,000,000 to "support the participation of farmers' markets in SNAP by providing equipment and support grants to new markets and those currently participating in the program." The Farmers' Market SNAP Support

Grant (FMSSG) program was developed to connect farmers' markets offering SNAP with this funding opportunity.

The Request For Applications package is necessary to describe the funding opportunity and solicit proposals from entities to participate in FMSSG. In order to select the most qualified grantees, a competitive request for applications is necessary. Interested entities will prepare applications. Grant funds will be made available on a competitive basis, subject to availability of federal funds. FNS will post the Request for Application (RFA) package for FMSSG on or about June XX, 2015 on www.grants.gov, and on its website at www.fns.usda.gov.

After FMSSG funds are awarded, grantees will be required to submit financial reports on a quarterly basis, and narrative progress reports on a semi-annual basis. These reports are necessary to ensure grantees use FMSSG funds appropriately, to further the purposes of the program, and in the manner described in their grant applications.

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 grant applicants through the RFA will be FNS staff, who will serve on review panels, using objective criteria to systematically evaluate and score grant proposals. The highest scoring proposals will be recommended to receive FMSSG funding. Depending on the number of applications received, FNS may seek volunteer reviewers from (in order of preference) other federal agencies, State and local government agencies, academia, and the

farmers' market community. This review process will occur only once during fiscal year 2015.

In addition to the information required by the RFA, the following OMB-approved forms are required of grant applicants:

- Non-Construction Grant Projects Forms: SF-424 Family
 1. Application and Instruction for Federal Assistance (SF-424)
 2. Budget Information and Instruction (SF-424A)
 3. Assurance-Non-Construction Programs (SF-424B)
 4. AD-3030 (only required for corporations)
 5. AD-3031 (only required for corporations)

These forms are located at <http://www.grants.gov/web/grants/forms.html>.

- 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>.

Using the SF 425, Grantees will submit a quarterly financial reporting. The primary users of the quarterly financial reports and semi-annual progress reports will be FNS staff and contractors. The reports will be used to ensure FMSSG funds are expended appropriately, to further the purposes of the program, and in the manner described in grantee applications. Quarterly financial reports will be submitted using SF-425, Financial Status Report, into FNS' Food Program Reporting System (FPRS). A final SF-425 is required no later than 90 days after the termination date of the grant project. In order to access FPRS, the grantee must obtain USDA e-authentication certification and access to FPRS. Semi-annual progress reports, detailing project

activities and performance, will be submitted by grantees using an online portal created by FNS' contractor, the Farmers Market Coalition (FMC), at www.fmctoolbox.org.

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 of 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 www.grants.gov. 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.

For financial reports and progress reports, FNS requires grantees to submit data electronically through FPRS, at <https://fprs.fns.usda.gov/Home/Reminder.aspx>, and the FMC portal, at www.fmctoolbox.org, respectively.

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.

FMSSG is a new program, with a unique universe of potential applicants and requirements. As such, there is no similar data collection available. Every effort has been made to avoid duplication in the information being required of FMSSG applicants.

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.

Small businesses and entities that could be affected include farmers' markets, farmers' market associations, and non-profit organizations. The FNS staff and contractors who drafted the FMSSG RFA and reporting requirements have experience drafting such documents, and, acutely aware of the burden unnecessary paperwork imposes on small entities, made conscious efforts to minimize the information collection burden associated with this funding opportunity.

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 expects this to be a one-time grant opportunity. The grants will be funded for the period June 1, 2015, through September 30, 2018. Once approved and before this collection expires in 2016, the program plans to work with Grant Management Division to ensure the remaining burden is accounted for in the remaining award period.

The consequence for not collecting the information required by the RFA would be that FNS would be unable to describe the FMSSG funding opportunity to, and solicit proposals from, potential applicants, or to select the most qualified grantees. The consequence of not collecting information required by the quarterly financial reports and semi-annual progress reports is that FNS would be unable to monitor grantees to ensure they use FMSSG funds appropriately, to further the purposes of the program, and in the manner described in their grant applications.

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. FNS prepared a written response to the commenting party.

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.

The RFA indicates that “when an application results in an award, it becomes a part of the record of FNS transactions, available to the public upon specific request. Information that the Secretary determines to be of a private, privileged, or proprietary nature will be held in confidence to the extent permitted by law. Therefore, any information that the applicant wishes to have considered as private, privileged, or proprietary should be clearly marked within the application. The original copy of an application that does not result in an award will be not released to the public. An application may be withdrawn at any time prior to the final action thereon.”

Moreover, grantees will be required to electronically submit the SF-425 form, which is stored in a secured database, FPRS. Therefore, grant awardees must obtain authorization to submit the form in FPRS. The applications for authorization contain personal identifying information on individuals doing business with FNS. Therefore, FNS 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 anticipates that respondents to this RFA are from different the affected public.

We estimate approximately 20 farmers' markets, 60 businesses and non-profit organizations, and 20 State,Local and Tribal Government (SLT). In total, we

estimate approximately one hundred (100) respondents will submit an application for FMSSG funding. FNS estimates the average applicant will spend 30 hours developing their proposal (including time for completing the required forms listed in question two, above). This estimate is based on prior experience of FNS staff and contractors who drafted this RFA, as well as conscious efforts made by such personnel to minimize the information collection burden associated with this funding opportunity.

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Reporting Burden

PRE AWARD REPORTING BURDEN							
Affected Public	Respondent Type	Instrument	Number of Respondents	Frequency of Responses	Total Responses	Estimated Time per Response	Estimated Total Burden Hours
State, Local, & Tribal Government Agencies	State, county, borough, municipality, city, town, township, parish, local public authority, special district, school district, intrastate district, council of governments, any Indian tribe, band, nation, or other organized group or community	RFA	20	1	20	30	600.00
SUBTOTAL			20		20		600.00
Business-for-and-not-for-profit	Public benefit corporations; Economic development corporations; non-profit	RFA	60	1	60	30	1800.00
SUBTOTAL			60		60		1800.00
Farmers' Markets	Farmers' markets, Farmers' market, associations, Regional farmers' market authorities	RFA	20	1	20	30	600.00
SUBTOTAL			20		20		600.00
Pre-Award Grand Total Reporting Burden			100	3	100	30	3000.00

FNS anticipates awarding approximately 25 total grants. We estimate 10 SLT government agencies, 10 Businesses and Non-Profit Organizations, and 5 Farmers' Markets will be awarded grants through this announcement. The annual post-award burden requirements are below:

Post Award Burden Summary

Number of Respondents: 25

Average Annual Responses per Grantee: 3.66

Average Annual Burden Hours Per Grantee: 8.66

Average Annual Burden Hours: 216.58

Total Responses Per Grantee (Over Three Years): 11

Total Burden Hours Per Grantee (Over Three Years): 25.99

Total Burden Hours (Over Three Years, All Grantees): 649.75

Post-award burden hour estimates are based on quarterly financial reports and semi-annual progress reports grantees must submit to. A final performance report is required within 90 days grant activities ending. Grant activities may last up to three years. Progress reports will include information on number and frequency of participation in project activities, SNAP redemption totals, description of activities that occurred during the reporting period and any difficulties in conducting project activities. The estimated post-award burden, per respondent, is reflected in the following table:

A.12.2 Estimate of Annual Post-Award Reporting Burden Hours Burden on Respondents (Affected Public: State, Local and Tribal Government, Businesses, Non-Profit Organizations, and Farmers' Markets). See table for list of potential grantee respondent types annual burden.

POST AWARD REPORTING BURDEN

Affected Public	Respondent Type	Instrument	Number of Respondents	Frequency of Annual Responses	Total Annual Responses	Estimated Time per Response	Estimated Total Annual Burden Hours
State, Local, & Tribal Government Agencies	State, county, borough, municipality, city, town, township, parish, local public authority, special district, school district, intrastate district, council of governments, any Indian tribe, band, nation, or other organized group or community	Progress Reports (Semi-Annual)	10	2	20	3	60.00
		SF-425 Financial Report (Quarterly)	10	4	40	1.5	60.00
		SF-424	10	1	10	0.33	3.3
		SF-424 B	10	1	10	0.33	3.3
		SF-LLL	10	1	10	0.33	3.3
		SF-425 Final Report (only in Year Three)	10	1	10	8	80.00
		Final Performance Report (only in Year Three)	10	1	10	5	50.00
SUBTOTAL			10		110		259.9
Business-for-and-not-for-profit	Public benefit corporations; Economic development corporations; non-profit	Progress Reports (Semi-Annual)	10	2	20	3	60.00
		SF-425 Financial Report (Quarterly)	10	4	40	1.5	60.00
		SF-424	10	1	10	0.33	3.3
		SF-424 B	10	1	10	0.33	3.3
		SF-LLL	10	1	10	0.33	3.3
		SF-425 Final Report (only in Year Three)	10	1	10	8	80.00
		Final Performance Report (only in Year Three)	10	1	10	5	50.00
SUBTOTAL			10		110		259.9
Farms	Farmers' markets, Farmers' market, associations, Regional farmers' market authorities	Progress Reports (Semi-Annual)	5	2	10	3	30.00
		SF-425 Financial Report (Quarterly)	5	4	20	1.5	30.00
		SF-424	5	1	5	0.33	1.65
		SF-424 B	5	1	5	0.33	1.65
		SF-LLL	5	1	5	0.33	1.65
		SF-425 Final Report (only in Year Three)	5	1	5	8	40.00
		Final Performance Report (only in Year Three)	5	1	5	5	25.00
SUBTOTAL			5		55		129.95
Post-Award Annual Grand Total Reporting Burden			25		275		649.75

Pre-and Post Award Reporting Burden Summary:

Total Three-Year Burden Hours (3,000 Pre-Award, 649.75 Post-Award Reporting and

Recordkeeping: 3,649.75 hours

Average Annual Burden Hours: 1216.58hours.

A.12.6 Estimates of Annualized Cost to Respondents for Applications and Reporting

The total estimated annual cost to Respondents is \$47,034.11 (1,215.98 burden hours x \$38.68 per hour). FNS estimates most Respondents will utilize at least one full-time staff member to conduct application and reporting activities, at a cost of \$38.68 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 2013).

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 \$81,130.00. This is based on an estimate of 19 hours of labor to process and review *each* application package.

The estimate assumes an hourly cost per staff person of \$42.70 per hour (the

salary for GS-12 step 6 grade level including overhead and benefits). This labor estimate includes 2 hours by grants management and program staff to process an application, 12 hours total for 3 reviewers to conduct a thorough technical review of each application, and 5 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award. It is estimated that 100 applications will be received, and thus 1,900 hours will be needed to process and review these applications. Pre-Award Federal labor costs will total \$81,130.00 (1,900 hours x \$42.70).

For each proposal anticipated to be awarded, Federal labor costs will total \$1,494.50. This is based on approximately 25 hours spent providing technical assistance and 10 hours reviewing the 7 program reports (progress reports (6) and final report (1)) for the grantee, for a total of 35 hours. (25 hours +10 hours= 35 hours x 1 grantee x \$42.70 per hour = \$1,494.50). Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2015, for a GS 12, Step 6 employee.

Total Annualized Pre-Award Cost to the Government	\$81,130.00
Total Annualized Post Award Cost to the Government	\$37,362.50
Total Annualized Cost to the Federal Government	\$118,492.50

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 program changes or adjustments since the last 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 applicants that receive grant funding on the *FMSSG* website. The specific method and format of such publication have yet to be finalized, but will be dependent on the type of applicants, and the contents of their submissions.

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.