2013 SUPPORTING STATEMENT for Federal-State Marketing Improvement Program OMB NO. 0581-0240

A. Justification.

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.

The information collection requirements in this request are needed to implement the Federal-State Marketing Improvement Program (FSMIP), which operates pursuant to the authority of the Agricultural Marketing Act of 1946 (7 U.S.C. 1621, et. seq.). Section 204(b) authorizes the Secretary of Agriculture to make available funds to State Departments of Agriculture, State bureaus and departments of markets, State agricultural experiment stations, and other appropriate State agencies for cooperative projects in marketing services and in marketing research to effectuate the purposes of title II of the Agricultural Marketing Act of 1946.

FSMIP provides matching funds on a competitive basis to assist eligible entities in exploring new market opportunities for U.S. food and agricultural products and to encourage research and innovation aimed at improving the efficiency and performance of the marketing system. AMS has been allocated approximately \$1.2 million in fiscal year (FY) 2013 for FSMIP; and it is anticipated that funding will remain at or near this level for FYs 2014 and 2015. Approximately 20 projects are expected to be funded annually, and the average grant award is expected to be about \$60,000. The program is voluntary.

FSMIP is executed in accordance with applicable parts of USDA's Uniform Federal Assistance Regulations (7 CFR 3015 et. seq.)

2. INDICATE HOW, BY WHOM, 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.

AMS is requesting the following revisions to the existing approved collection:

- 1) Add a requirement for applicants to sign form AMS-33 and to read Grant Terms and Conditions. The AMS-33 replaces the Grant Agreement that was approved under the previous collection. The Grant Terms and Conditions replace forms AD-1047; AD-1048 and AD-1049 that were approved under the previous collection.
- 2) Add a requirement that proposal reviewers sign a Conflict of Interest/Confidentiality Statement. Although the requirement must be met by all reviewers, only the burden for non-federal reviewers is added to the collection.
- 3) Add a requirement that proposal reviewers use a score sheet to record their scores of assigned proposal on evaluation criteria set by FSMIP, and to record comments about the assigned proposals' strengths and weaknesses. Although the requirement must be met by all reviewers, only the burden for non-federal reviewers is added to the collection.
- 4) Account for the burden for applicants to read the Application Guidelines.

The following forms are used in this collection:

- a) FSMIP Application Guidelines: Each year, FSMIP prepares Application Guidelines that are made available to applicants at www.grants.gov and at the FSMIP website upon official announcement of the program. The FSMIP Application Guidelines enable applicants to prepare a proposal that meets all requirements. The burden for applicants to read this document was not accounted for on the 2010 PRA collection.
- b) <u>Standard Form (SF) 424, Application for Federal Assistance</u>: This form is completed once when the eligible entity applies for the grant program via <u>www.grants.gov</u>. The information will be used by AMS to establish the entity's eligibility to participate in FSMIP. The burden for this form is decreased because the number of applications expected has been revised downward.
- c) <u>Supplemental Budget Spreadsheet and Budget Narrative</u> (replaces the use of SF-424A): The Supplemental Budget Spreadsheet and Budget Narrative are not new requirements. The Supplemental Budget Spreadsheet and Budget Narrative contain much more detailed information about the grant request and the

nature of the matching resources brought to the project. This information eliminates the need for the SF 424A as a requirement.

d) Proposal Components (previously called Proposal

Narrative): The application is completed one time when the eligible entity applies for a FSMIP grant. In addition to the SF 424 and SF 424B, the required components are listed below.

- 1. Cover Page, Title, Project Contacts
- 2. Narrative
 - Project Summary (abstract)
 - Background and Justification
 - Other Grant Programs (indicate if the proposal has been submitted to any other grant programs)
 - Goals, Objectives and Work Plan
 - Project Evaluation, Outputs and Expected Outcomes
 - Project Deliverables and Outreach Plan
- 3. Budget Spreadsheet and Budget Narrative
- 4. Other Required Elements
 - Personnel Qualifications
 - Debarment and Suspension Verification Applicants must include a statement that they have checked the status of Sub Grantees and Contractors at the System for Award Management (<u>www.sam.gov</u>)
 - Matching Letters Letters from third parties who will contribute matching resources
 - Letters of Support At least one, but no more than three, letters of support from project stakeholders or beneficiaries

The item called "Project Deliverables and Outreach Plan," is not a new requirement but previously it was embedded in the Narrative and the instructions for applicants were not as detailed. Applicants now are asked to describe how they will disseminate project results to stakeholder groups and others. Such activities might include presentations at professional conferences or producer meetings, and publication of articles in professional journals or the agricultural press. Applicants are also asked to list any expected deliverables that will result from the project in addition to the required final report. Examples of project deliverables include professional journal or farm press articles, Extension bulletins, manuals, educational brochures, .ppt presentations, survey instruments, and websites. This information will help reviewers evaluate the potential impact of the proposal.

The item "Debarment and Suspension Verification" is a new requirement. Applicants must include a statement that they have

checked the status of sub grantees and contractors at the System for Award Management (www.sam.gov) to ensure that sub grantees and contractors are not debarred, suspended or otherwise excluded from eligibility to receive grant funds.

"Matching Letters" is a new requirement to ensure the commitment of resources by third parties listed in the Supplemental Budget Spreadsheet and Budget Narrative. Matching Letters are in the form of a letter on organization letterhead, and may be addressed either to the State Agency or to the FSMIP Staff Officer. Matching Letters accompany the proposal at the time of application and must include:

- Organization name, name and title of letter writer, address, telephone number and email address
- Project title and a reference to fiscal year of the FSMIP opportunity.
- Total dollar amount of cash contribution and/or a description of the in-kind contribution. For example, if the in-kind contribution is personnel time, include name, title, total dollar amount and an indication of number of hours or percent of salary the dollar amount represents.

"Letters of Support" is a new requirement. Applicants must submit at least one, but no more than three, letters of support demonstrating the value of the proposal to stakeholders. In the past, letters of support were optional and there was no limit on the number of letters that applicants could submit up to two weeks after the application deadline. Letters of Support are in the form of a letter on organization letterhead, and may be addressed either to the State Agency or to the FSMIP Staff Officer. Letters of Support accompany the proposal at the time of application. Form letters are discouraged. The estimated burden to complete the Proposal Components has been increased from 33 to 40 hours.

Full details for preparing the Proposal Components are available at the FSMIP website www.ams.usda.gov/FSMIP.

- e) <u>Standard Form 424B, Assurances-Non-Construction</u>
 <u>Program</u>: This form is signed and dated once by applicants at the time of application. The information will be used by AMS to certify that applicants will comply with applicable Federal regulations. Previously, this form was required only for grantees, but now it will be required by all applicants. This new requirement will increase the previously approved public reporting burden for this form.
- **f)** Agreement Face Sheet (AMS-33): This document partially replaces the Grant Agreement and is required for each grant project. Electronic signatures of the 1-page AMS-33 are provided by both AMS

and the grantee after the proposals have been approved but before the end of the fiscal year in which the awards are made. The information will be used to affirm the award amount, and the time frame, objectives and work plan agreed upon by the grantee and USDA/AMS.

- g) <u>Grant Terms and Conditions</u>: This document partially replaces the Grant Agreement and is required for each grant project. This document contains and/or references all of the grant terms and conditions required of grantees and sub-grantees in a specific fiscal year. The document is not customized to the specific grantees. It incorporates the text and references previously contained in the AD-1047, AD-1048 and AD-1049 as well as other regulatory requirements. The document is updated annually to reflect the latest regulatory requirements and program policies. In fiscal 2012, the document was 34 pages long. Grantees are expected to read the document and use it as a reference throughout the grant period. Grantees do not sign the Grant Terms and Conditions. Instead, by signing the AMS-33, grantees agree to the terms and conditions outlined in the Grant Terms and Conditions.
- h) <u>Progress Report:</u> This document is required at the midpoint of projects approved for one year and at six-month intervals for projects of longer duration. Progress Reports should (1) briefly summarize activities performed and milestones achieved for each objective or sub-element of the Proposal Narrative; (2) note unexpected delays or impediments as well as favorable or unusual developments; (3) outline work to be performed during the succeeding period; and (4) comment about the amount of grant and matching funds expended to date. There is no specific format for the Progress Report. Grantees submit the Progress Report to FSMIP via e-mail. The burden for Progress Report has been reduced because fewer grant awards are expected to be made compared to the past.

j) Standard Form 270, Request for Advance or

Reimbursement: This form is completed whenever the grantee requests an advance or a reimbursement of grant funds. The information will be used to make and keep track of grant disbursements, and to monitor the level of matching funds expended by the grantee during the grant period. The grantee scans and emails the document to the FSMIP office and retains the original in the project file. The burden for Standard Form 270 has been reduced because fewer grant awards are expected to be made compared to the past.

- **k)** Standard Form 425, Federal Financial Report: This form is completed once by the grantee not later than 90 days following the ending date of the grant to summarize cumulative financial activity during the full grant period. The information will be used by AMS to assess the final financial status of the grant project and to ensure that the \$1-to-\$1 matching requirement is met before proceeding with the grant closeout. The grantee scans and emails the document to the FSMIP office and retains the original in the project file. The burden for Standard Form 425 has been reduced because fewer grant awards are expected to be made compared to the past.
- **I) Final Report:** A Final Report summarizing results and accomplishments of the project is due within 90 days following the grant ending date. The Final Report includes the components listed below. The components have not changed.
 - An outline of the issue or problem
 - A description of how the issue or problem was approached via the project
 - A description of the contribution of public or private agency cooperators
 - A description of results, conclusions and lessons learned
 - A summary of current or future benefits to be derived from the project
 - Additional information available (publications, websites)
 - Recommendations for future research needed, if applicable
 - A description of project beneficiaries
 - The contact person for the project with telephone number and email address.

Final Reports are required to fulfill the terms of the Grant Terms and Conditions, but they also represent an important vehicle for sharing research findings with Federal and State agencies and the public. To further this goal, the Final Report will be prepared in a format which can be reproduced for wide print distribution and is suitable for posting on the FSMIP website. There is no specific format for the Final Report beyond the guidance above. The Final Report and any other materials, reports, etc. that are produced as a result of the project must be submitted via e-mail/electronically.

The estimated burden to complete the Final Report has been increased from 32 to 40 hours, but fewer grant awards are expected to be made compared to the past.

- **m)** Recordkeeping: Grantees are required to maintain all records pertaining to the grant for a period of 3 years after the SF 425 is submitted to FSMIP. The burden for Recordkeeping has been reduced because fewer grant awards are expected to be made compared to the past.
- **n)** Conflict of Interest/Confidentiality Statement for Proposal Reviewers: In the past, FSMIP included a statement about conflict of interest and confidentiality in the instruction package for proposal reviewers but reviewers were not asked to sign a formal statement. The review procedures were revised since the last burden collection to require that a conflict of interest/confidentiality statement be signed by all reviewers before they review their assigned proposals. This is a new burden, but it applies only for that portion of reviewers outside the federal system.
- o) Reviewer Score Sheet: In the past, only federal employees reviewed FSMIP proposals, and thus the burden for reviewing proposals was zero. However, starting in 2013, university researchers and marketing experts outside the federal system will be recruited to review some FSMIP proposals. The burden for the Reviewer Score Sheet is new, but only that portion of reviewers that is outside the federal system is reflected in the burden. Previously, FSMIP used paper score sheets. Starting in 2013, reviewers will compile their proposal evaluations, including scores and comments, on a web-based Internet site accessible through a private firm.
- 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.

The FSMIP Application Guidelines are available at grants.gov and at the FSMIP website.

Standard forms (SF) 424 and 424B are obtained and submitted electronically via the www.grants.gov web site when the applicant accesses the FSMIP opportunity. The Proposal Narrative and Other Required Elements are submitted electronically via www.grants.gov. The AMS-33 requires electronic signatures from AMS and the grantee. Grantees scan and email the SF 270s and the final SF 425 to the FSMIP

office, and retain the original documents in their project files. Progress Reports and Final Reports are emailed to FSMIP by the grantee.

FSMIP is investigating the use of an electronic system to handle the part of the proposal review process. It is anticipated that Reviewer Score Sheets will be completed on line by reviewers in their course of their evaluations.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

This program is not maintained by any other agency; therefore, the requested information will not be available from any other existing records.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The eligible entities for FSMIP are State departments of agriculture, State agricultural experiment stations, and other appropriate State agencies including State colleges and universities. Thus, this information collection will not impact small businesses and other 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.

FSMIP's purpose is to provide grants to eligible entities on a competitive basis. Without the required information, AMS will not be able to award grants to eligible entities.

- 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;

Respondents are not required 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;

Respondents are not required to prepare a written response to an information collection in fewer than 30 days from receipt.

- REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;

Respondents are not required to submit original documents.

 REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS;

Respondents are not required to retain any records for more than 3 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;

The information collected will not be utilized in connection with a statistical survey.

- REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;

There is no requirement for a statistical data classification.

THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE 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

With regard to the FSMIP review of applications, federal and nonfederal proposal reviewers must sign a Conflict of Interest/Confidentiality statement before beginning their reviews of assigned proposals. Reviewers must agree not to copy, quote, or otherwise use or disclose to anyone, any material from any application. Reviewers must also comply with the conflict of interest requirements, which include that the reviewer does not have: 1) a direct financial interest in the review outcome; or have direct and predictable financial interests in the outcome; 2) indirect interests with the organization or personnel submitting an application under FSMIP; or 3) any relationship, such as a close personnel friendship, that may affect the reviewers' judgment or be seen as doing so by a reasonable person familiar with the relationship.

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.

Respondents are not required to submit proprietary trade secrets or other confidential information.

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.

A 60-day notice was published in Vol. 78, No. 100 of the Federal

Register on May 23, 2013, which invited comments from interested persons. No comments were received.

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.

The FSMIP Staff Officer attends the annual meeting of the North American Agricultural Marketing Officials, a group whose members consist of the marketing directors of the State agriculture departments. These directors are very often the project managers for FSMIP projects. The FSMIP Staff Officer also attends the annual Food Research Distribution Society meeting which is attended by university researchers, some of whom apply for and receive FSMIP funds. The FSMIP Staff Officer also participates in a grants panel at the annual American Agricultural Economic Association which is attended by academics carrying out marketing research. Issues relating to the application and grant management processes may be discussed informally at such meetings. They are also discussed in telephone conversations with applicants prior to the application deadline and with grantees as they carry out their projects.

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 PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

The FSMIP Staff Officer contacted the following individuals for their input in February 2013:

FSMIP Application and Grant Management

Gina P. Cofield, Fiscal Manager, Grants & Contracts Administration, Clemson University, (864) 656-1239, gcofiel@clemson.edu

Steven Pharr, PhD, Market Research Analyst, The Food Processing Center, University of Nebraska-Lincoln, 402-472-2185, spharr2@unl.edu

Kevin Riggi, Senior Budgeting Analyst, New York Department of Agriculture and Markets, 518-485-5475, Kevin.Riggi@agriculture.ny.gov

Jonathan Thomson, Economic Development Specialist, New York State Department of Agriculture and Markets, 518 485-8902, <u>Jonathan.Thomson@agriculture.ny.gov</u>

FSMIP Review Process

Debbie Tropp, Chief/Supervisory Agricultural Marketing Specialist, Farmers Market & Direct Marketing Research Branch, Marketing Services Division, AMS, USDA, 202-720-8326, Debra.Tropp@ams.usda.gov

James Barham, Economist, Farmers Market & Direct Marketing Research Branch, Marketing Services Division, AMS, USDA, 202-690-4077, james.barham@ams.usda.gov

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts are provided to respondents, other than remuneration of grantees.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

FSMIP does not request confidential information from respondents and therefore provides no assurances related to confidentiality.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND 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.

Questions of a sensitive nature are not found in this information 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. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.
- 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.

Estimates of the burden of collection of information have been summarized on AMS Form 71.

- PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES.

The respondents' estimated annual cost in providing information to FSMIP is \$222,886. This total has been estimated by multiplying 5,363 total burden hours by \$41.56, an average of total compensation by state and local government white collar employees. Data for computation of this hourly wage were obtained from Table 4, page 9 of the U.S. Department of Labor Statistic's news release USDL-12-2404 dated December 11, 2012. The press release can be found at the following website: http://www.bls.gov/news.release/pdf/ecec.pdf.

In the previously approved collection, the estimate was based on the average of

mean hourly earnings by state and local government white collar (excluding sales) employees. In order to have a comparable annual cost for respondents and for AMS as outlined in question #14, the estimate of total compensation was utilized for this calculation.

- 13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).
 - THE COST ESTIMATE 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. THE **ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS** ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE **DESCRIPTIONS OF METHODS USED TO ESTIMATE MAIOR** COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL **EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME** PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.
 - IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.

- GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.

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, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

The estimated annual cost to operate FSMIP is \$275,000 per year. The FSMIP office consists of one full time GS-14 Staff Officer who is responsible for all aspects of the grant program from pre-award to closeout. The Travel budget is for the Staff Officer to attend appropriate conferences, and conduct site visits to FSMIP projects. The Training budget is for the Staff Officer to keep up to date with developments in Federal grants management.

FSMIP introduced a new proposal review process in 2012. In the past, FSMIP relied entirely on federal subject matter specialists to review FSMIP proposals. The new review process includes not only federal personnel but outside experts from the university community who have subject matter expertise or expertise in agricultural marketing.

All non-federal FSMIP reviewers receive a stipend for their services. This change was made to introduce greater consistency and transparency in the review of proposals, and, bring a high level of national expertise to improve the credibility and validity of the scoring and recommendations. The resulting reviews also provide more useful feedback for applicants. The Contracts/Services line item reflects compensation for non-federal reviewers.

The Agricultural Marketing Service has embarked on an effort to automate its grant functions and has convened an agency level functional committee that meets regularly to identify and recommend ways in which processes may become more standardized and streamlined. Grants Management Enhancement is one of the priorities of the AMS Strategic IT Investment Plan, FY 2013 to 2017. The plan calls for enhancement and adaptation of a software package currently used elsewhere in the agency to all aspects of the grant programs, and eventually, to create interfaces (1) with www.grants.gov, (2) between the agency's financial management system and Treasury's ASAP system, and (3) between AMS and the FFATA/FSRS reporting systems. This technology will improve the efficiency of all aspects of AMS grants management. The Contract/Services budget below reflects the FSMIP share of the costs of these IT investments in FY 2013.

The remaining line items are for administrative expenses and overhead. Other line items have been eliminated or reduced due to budget constraints, reduced personnel, reorganization and the adaption of more efficient procedures, such as acceptance of electronic signatures and scanned documents in all aspects of grants management which reduces the amount of paper and postage used in the day to day operations of the grant program.

Estimated Annual Cost to Federal Government of Operating FSMIP - FY 2013

Salaries/Benefits/FERS Contributions		\$174,000	
Travel		\$ 4,000	
Training	\$	2,000	
Contracts/Services		\$ 87,500	
Printing/Copying/Mailing		\$ 1,000	
Rent/Communication/Utilities	\$	500	
Supplies/Equipment		<u>\$ 6,000</u>	
Total	\$ 2	\$ 275,000	

15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

There was an adjustment decrease of -1,832 burden hours and a program change increase of 80 hours for a net decrease of -1,752 hours. This reflects a combination of changes described below and shown on the separate AMS-Q:15 breakdown supplementary attachment.

Application Guidelines; SF 424; Project Proposal Narrative and Other Required Elements: The number of respondents has been increased from 75 to 80 due to growing interest in the program, but the number of responses per respondent has been reduced. The trend is for applicants to submit only one application per year, rather than as in the past when a number of state departments of agriculture submitted multiple applications.

Conflict of Interest/Confidentiality Statement; Proposal Score Sheet for Reviewers: This activity was not accounted for in the previous collection. These requirements would apply to the estimated 20 non-federal reviewers that would participate in the proposal review process.

16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

FSMIP final performance reports will be posted on the AMS FSMIP website. The remaining collected information will not be published.

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.

Each form currently contains an OMB number and an expiration date.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

The Agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.9 and the related provision of 5 CFR 1320.8(b)(3).

B. <u>COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL</u> METHODS

THE AGENCY SHOULD BE PREPARED TO JUSTIFY ITS DECISION NOT TO USE STATISTICAL METHODS IN ANY CASE WHERE SUCH METHODS MIGHT REDUCE BURDEN OR IMPROVE ACCURACY OF RESULTS. WHEN ITEM 17 ON THE FORM OMB 83-1 IS CHECKED "YES", THE FOLLOWING DOCUMENTATION SHOULD BE INCLUDED IN THE SUPPORTING STATEMENT TO THE EXTENT THAT IT APPLIES TO THE METHODS PROPOSED.

This information collection does not employ statistical methods.