2014 SUPPORTING STATEMENT for Farmers' Market Promotion Program

OMB No. 0581-0235

A. Justification.

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

The U.S. Department of Agriculture (USDA), Agricultural Marketing Service (AMS) is requesting the approval from the Office of Management and Budget (OMB), for the currently approved information collection for OMB 0581-0235, and extension and revision of forms approved for the Farmers' Market Promotion Program (FMPP). The FMPP operates pursuant to the authority of the Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627), the Farmer-to-Consumer Direct Marketing Act of 1976 (7 U.S.C. 3001-3006), and the authorized FMPP (7 U.S.C. 3005). Section 6 of U.S.C. 3005 directs the Secretary of Agriculture to carry out a program to "make grants to eligible entities for projects to establish, expand, and promote farmers' markets and to promote direct producer-to-consumer marketing." The FMPP grant program is administered by the AMS, Transportation and Marketing Program (TM).

The purposes of the FMPP are to: 1) increase domestic consumption of agricultural commodities by improving and expanding, or assisting in the improvement and expansion of, domestic farmers' markets, roadside stands, community-supported agriculture programs, agri-tourism activities, and other direct producer-to-consumer market opportunities; and 2) develop, or aid in the development of, new farmers' markets, roadside stands, community-supported agriculture programs, agri-tourism activities, and other direct producer-to-consumer opportunities.

Under the 2006 and updated 2008 Farm Bills, entities eligible to apply for FMPP grant funds include: agricultural cooperatives, producer networks and producer associations, local governments, non-profit corporations, public benefit corporations, economic development corporations, regional farmers' market authorities, and Tribal Governments. Eligible entities in all 50 States and the District of Columbia may participate. Entities located within U.S. territories (implemented in grant funding FY-2012), including the American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, and the Northern Mariana Islands, are also eligible to participate.

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.

Electronic and paper submissions from the applicant to AMS/USDA are not accepted. All paperwork must be submitted via the Grants.gov website. The following information is being collected from FMPP grant applicants:

- A) <u>Standard Form 424</u>, Application for Federal Assistance, is completed once when the eligible entity applies for the grant program. AMS will use the information to determine the entity's eligibility for participation in the FMPP. The form can be obtained electronically via the Grants.gov website at http://www.Grants.gov during application submission.
- B) Standard Form 424B, immediately following grant approval and one more time prior to grant funds being disbursed, an assurance that the grant will be used for Non-Construction purposes only is made on this form. AMS will use the information to certify that grant participants are complying with applicable program regulations. The form can be obtained electronically via the Grants.gov website at http://www.Grants.gov during application submission.
- C) **Project Proposal Narrative**, the narrative is completed once the applicant applies for the FMPP grant program. AMS will use the information prior to award (pre-award), to determine eligibility of applicants; and pre- and post-award, to evaluate goals, objectives, work-plans, expected results, and budget for the project prior to and after project implementation. The narrative is being revised to update, eliminate, or consolidate four sections:
 - "Goals of the Project" is being updated to require an explanation about how the proposed project addresses the FMPP mission,
 - "Primary Proposal Activity" is being eliminated,
 - "Beneficiaries" –is being consolidated within the "Expected Outcomes and Beneficiaries" section, and
 - "Proposal Activities" is being consolidated within the "Workplan, Resources, and Timeline" section.

The narrative can be obtained electronically and submitted electronically to AMS via http://www.Grants.gov.

The narrative portion of the project proposal, including the supplemental budget summary, must be single-sided and not exceed 12 pages (Times New Roman font, 12 pt. pitch, single spaced, 8.5x11-inch paper) and organized under the following headings:

- 1) *Project Title*. Must capture the primary focus of the project, and match the title provided on Form SF-424.
- 2) Applicant/Organization Information. Provide the applicant/organization name, contact name, mailing address, telephone and fax number, and email address(es) for the person(s) designated to answer questions about the application, financial information, and the proposed project budget.

- 3) *Primary Project Manager Information*. The name, mailing address, telephone and fax number, and email address for the person(s) responsible for managing and/or overseeing the project.
- 4) Requested FMPP Funding and Matching Funds (if a match is required). The dollar amount requested from FMPP. Other funding sources, matching, and in-kind contributions are included in the "Matching Funds," section, as applicable.
- 5) *Entity Type and Eligibility Statement*. The entity type, statement of qualification as an eligible entity, and any required documentation of eligibility. Applications that do not contain sufficient information to determine the eligibility of the applicant will not be considered.
- 6) *EBT*, *Equipment*, *Supplies*, *and Promotional Projects*. Indication of whether or not the proposal includes a new or existing electronic benefit transfers (EBT) component; or includes purchases of equipment, supplies, or other promotional items.
- 7) *Executive Summary*. The proposal summary provides the project description, goals to be accomplished, outcomes expected, and a timeline of activities.
- 8) *Project Implementation Address.* The location(s) where the project will be implemented, including the street address, city, state, zip code, county, and latitude and longitude coordinates (Internet-obtainable geo-coordinates from mapping software) for all places where the project will be implemented.
- 9) *Goals of the Project*. A clear statement of the goal(s) and activity(ies) of the project. A brief statement explaining how the project addresses the stated mission of FMPP is required.
- 10) *Background Statement*. A description of the current conditions that justify the need of the project, and an explanation of why the condition will not be improved absent the project so the need will remain unmet.
- 11) Work-plan, Resource, and Timeline Requirements. A list of each planned activity(ies), a timeline for completion, and resources needed, and milestones for assessing progress for each activity(ies).
- 12) *Expected Outcomes and Beneficiaries*. List of outcomes of the project and beneficiaries of each outcome. Describe the method of quantifying the outcome and beneficiaries that will be used to measure the success of the project.
- 13) Evaluation Criteria Statements. All applications will be evaluated against the criteria in the "Proposal Evaluation Criteria," published each year the program operates, which can be found within the FMPP Guidelines at www.ams.usda.gov/FMPP. The criteria may be revised annually based on the priorities for annual funding. A statement of applicability is required for each criterion. For full consideration, all criteria should be addresses by the proposal.
- 14) *Existing and Pending Support*. List all current and pending public or private support for the project. An application that duplicates or overlaps substantially with project activities or application already reviewed and funded will not be funded under FMPP.

15) *Supplemental Budget Summary* (not counted toward the 12-page limit). Provide a detailed budget using the six (6) categories of expenses: personnel, contractor, travel, equipment, supplies, and other. If a match is required, a separate column with the same six (6) categories will be used to describe the match.

Because of the number of inquiries and applicants during previous program implementation for FY-2012 – 370, FY-2011 – 397, and FY-2010 – 509 applicants, AMS developed forms with instructions for completing the Project Proposal Narrative (above) to assist applicants. The forms, which were previously voluntary, are now mandatory forms and provide uniform application for peer reviewers under FMPP:

- D) **TM-29 FMPP Project Proposal Narrative Form**, is completed once by the applicant as described (section A.2.D), parts 1)-15) above. The narrative can be obtained electronically via the Grants.gov website at http://www.Grants.gov during application submission.
- E) **TM-30 FMPP Supplemental Budget Summary Form**, is completed by the applicant as described (section A.2.D). part 15)) above. The budget form can be obtained electronically via the Grants.gov website at http://www.Grants.gov during application submission.

Mandatory forms (TM-29 and TM-30 above) assist FMPP applicants (and selected awardees) in preparing and implementing the proposal narrative and supplemental budget summary information, and will not increase the overall estimated burden hours. These burden hours are already accounted for under the "Project Proposal Narrative" (section A.2.E).

Before funds are dispersed, applicants that are selected for FMPP grant funds (awardees) must complete the following forms:

- F) <u>Standard Form AD-1047</u>, "Certification Regarding Disbarment, Suspension, and Other Responsibility Matters Primary Covered Transactions" is completed once and must have the awardee's original signature. The form can be obtained electronically via the Grants.gov website at http://www.Grants.gov during application submission.
- G) <u>Standard Form AD-1048</u>, "Certification Regarding Disbarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions," is completed once and must have the awardee's original signature. The form can be obtained electronically via the Grants.gov website at http://www.Grants.gov during application submission.
- H) **Standard Form AD-1049**, "Certification Regarding Drug-Free Workplace Requirements (Grants) Alternative I For Grantees Other Than Individuals," can

be obtained electronically from the AMS website at http://www.ams.usda.gov/FMPP/FMPP/FY-07/AD1049.pdf. This form is completed once by the awardee who will keep this document for their records.

Additionally, grant awardees must also complete the following form and paperwork for AMS:

- I) Grant Agreement AMS-33 United States Department of Agriculture,
 Agricultural Marketing Service, Agreement Face Sheet. The grant agreement is used as documentation of the awardee(s) agreement to comply with the terms and conditions of the grant award, project work approved, and receipt of grant funding. The agreement also indicates the grant authority; funding dollar amount; awardee and Federal contact names, address, email addresses, and phone and fax numbers; agreement number; project title, objectives, and statement of work; project work beginning and ending dates; and the awardee and AMS, TM, Deputy Administrator's signatures. Two (2) copies of this agreement are required with the awardee and AMS, TM, Deputy Administrator's signatures and date for each grant.
- J) Standard Form SF-270, "Request for Advance and Reimbursement," is required whenever the awardees request an advance or reimbursement of Federal grant funds. AMS expects that a least three (3) SF-270 forms will be submitted during the grant agreement period. Form SF-270 can be obtained electronically via the AMS website at http://www.ams.usda.gov/FMPP. For payment requests, the form must be completed with the awardee's signature, scanned, and submitted to AMS by email.
- K) **Performance (Progress) Reports**. The Performance Report is written documentation required to notify AMS about the work activities and progress towards completing the awardees' established project workplan goals, objectives, and timelines. AMS expects that at least a minimum of two (2) Performance Reports will be submitted every 6 months during the grant agreement period on a schedule provided to the awardee. Details about the construction of this report are updated annually and provided on the FMPP website.
- L) **Final Performance Report**. The one-time submitted Final Performance Report is written description of the fulfillment of the project terms and conditions required by AMS within 90 days after the ending date of the grant agreement. This information is utilized as final documentation of completion of the workplan goals, objectives, and activities. Details about the construction of this report are updated annually and provided on the FMPP website.
- M) <u>Standard Form SF-425</u>, "Federal Financial Report" (replaces "SF-269 Financial Status Report" and "SF-272 Federal Cash Transaction Report") is required with each payment request. A report is required with the first payment request, regardless of whether the awardee has received FMPP grant funds.

AMS expects that at minimum two (2) or a maximum of seven (7) Federal Financial Reports will be submitted depending on the duration of the grant agreement period. AMS will use the information to determine the use of cash provided by FMPP and the organization's spending practices in correlation to performance reports provided. Additionally, one-time submission of a Final Federal Financial Report is required no later than 90 days after the expiration date of the grant period. The report can be obtained electronically via the AMS website at http://www.ams.usda.gov/FMPP (forms and additional information). The form must be completed with the awardee's signature, scanned, and submitted to AMS by email.

N) **Grant Recordkeeping**. AMS requests that grant recipients maintain all records pertaining to the grant for a period of 3 years after the final financial report has been submitted to AMS, in accordance with Federal recordkeeping regulations. This requirement is provided in 7 CFR 3015.21 and 3015.22 and the FMPP General terms and Conditions, which are published at AMS website at http://www.ams.usda.gov/FMPP.

Only awardees will be required to maintain grant records for 3 years.

If this is an ongoing collection, how have the collection requirements changed over time?

The collection request, currently approved under OMB No. 0581-0235, is revised as follows:

- Eliminates the use of "Standard Form 424A." The budget information is already captured under "Form 30, FMPP Supplemental Budget Summary Form."
- Updates "Form TM-29, FMPP Project Proposal Narrative Form." The narrative features sections that must be addressed. One section in the narrative is added, "Project Implementation Address" to explain where the project is being implemented. Three sections are being updated, eliminated, or consolidated within other sections within the narrative:
 - o "Goals of the Project" is being updated to require an explanation about how the proposed project addresses the FMPP mission,
 - o "Primary Proposal Activity" is being eliminated, and
 - o "Proposal Activities" is being consolidated within the "Workplan, Resources, and Timeline" section.

"Form TM-29, FMPP Project Proposal Narrative Form" and "Form 30, FMPP Supplemental Budget Summary Form," which were voluntary, are converted to mandatory for use for the application narrative and budget development and submittal processes. The mandatory status and the updates to the narrative will not increase the total number of burden hours. These burden hours are captured in the proposal narrative.

- Updates the "Grant Agreement" to a mandatory form "AMS, United States
 Department of Agriculture, Agriculture Marketing Services, Agreement Face
 Sheet." This form, which will be generated by AMS, indicates the awardees
 compliance with the terms and conditions of the grant award. The agreement
 is signed by AMS and the awardee.
- 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.

For FMPP applicants:

- Standard Forms 424 and 424B can be obtained, completed electronically, and submitted to AMS electronically via the http://www.Grants.gov website. Prior to submission, the forms can also be obtained via the Grants.gov website and OMB grant management forms website electronically.
- The FMPP Project Proposal Narrative form and Supplemental Budget Summary form, (TM-29 and TM-30) can also be obtained, completed electronically, and submitted to AMS electronically via the http://www.Grants.gov website at application submission. Prior to submission, the forms can be obtained via the AMS website at http://www.ams.usda.gov/FMPP, by calling 202/720-8317, and faxing an email address to 202/690-0031 when program funding is made available.
- Standard Forms AD-1047, AD-1048, and AD-1049 are available via the Grants.gov website at http://www.Grants.gov.

In 2012, AMS received 370 applications for the FMPP grant program; over 395 in 2011, and over 500 applications in 2010. It is not feasible for AMS to receive these applications, proposals, and forms electronically, except via the established Grants.gov portal interface.

For FMPP awardees:

Standard Form 270 and 425 can be obtained, completed electronically, and saved from the 1) White House forms website via

http://www.whitehouse.gov/sites/default/files/omb/grants/sf270.pdf and the FMPP website: http://www.ams.usda.gov/FMPP (forms and additional information) (SF-270); and 2) White House forms website via http://www.whitehouse.gov/sites/default/files/omb/grants/approved_forms/SF-425.pdf and the FMPP website: http://www.ams.usda.gov/FMPP (forms and

additional information) (SF-425). Both forms must be completed with the awardee's signature, scanned, and submitted to AMS by email.

- Information regarding the construction of the Performance Report and Final Performance Report can be obtained via the AMS website at http://www.ams.usda.gov/FMPP (forms and additional information).
- 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 (ITEMS 5 OF THE OMB FORM 83-I), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The Small Business Administration defines, in 13 CFR part 121, small agricultural producers as those having annual receipts of no more than \$750,000 and small agricultural service firms (small for-profit organizations) as those having annual receipts of no more than \$7.0 million.

FMPP neither solicits nor collects proprietary information about receipts, sales, nor organization membership. However, under these definitions, we can report that 20 of the 370 eligible applicants (a little over 5 percent) under 2012's FMPP program would be considered small entities. These entities include producer networks, producer associations, agricultural cooperatives, and farmers market authorities, who apply on behalf of multiple members. We have estimated the number of respondents for this collection is 1500, and only 75 (5 percent) would be considered small businesses (producers).

This collection provides funding sources for small businesses and other small entities. All applicants must apply via the Grants.gov website. Providing for electronic submission of grant applications simplifies and lessens the burden on applicant's resources because they will no longer need to duplicate and submit paper applications.

6. DESCRIBE THE CONSEQUENCE OF 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.

The Farmers' Market Promotion Program's purpose is to provide grants to eligible entities. Without the required information, AMS will not be able to review, award, reimbursement, or monitor grants to eligible applicants.

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 required to report application information once. Awardees are required to provide performance (every 6 months) and financial (with each payment request) reports in accordance with AMS requirements, which are in accordance with regulations.

REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;

There are no plans to require applicants to prepare a written response to an collection of information in fewer than 30 days after AMS receives it. During the application review process if an email address has been provided by the applicant, AMS will email a notification of receipt of their application. Reporting requirements for the project (performance) implementation and financial (funds usage and cash on hand) status are submitted; no follow-up is required by the awardee unless AMS requires additional clarification.

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

Respondents are not required to submit more than an original Grants.gov application documents. Only one electronic emailed copy of the performance and financial reports are required.

- 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

No confidential information is collected.

- 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.

On January 22, 2014, the AMS published a 60-day *Federal Register* Notice requesting comments on an extension and revision information collection in the *Federal Register* (Vol. 79, No. 14, pg. 3563). At the date of posting this document supporting statement, no comments were received on the FMPP information collection or 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.

During the development of the Farmers' Market Promotion Program, AMS conducted focus groups and interviews with farmers' market industry leaders to identify and understand challenges and concerns relating to direct marketing issues. AMS also solicits comments from awardees and peer reviewers under FMPP.

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.

Consultation with the following representatives from whom information was obtained regarding the project proposal budget and forms was developed through grant writing conferences and workshops, industry meetings, peer reviewer meetings, and other program outreach activities associated with administering the agency's farmers market program:

Adam Schroeder, Pearl Market Manager (applicant/awardee) Capital Crossroads Special Improvement District 23 North Fourth St. Columbus, Ohio 43215 (614) 645-5061

Sanjay Kharod, Executive Director (applicant/awardee) New Orleans Food and Farm Network 4840 Banks Street New Orleans, Louisiana 70119 (504) 483-6967

James Coleman (applicant/awardee) Town of Riverdale Farmers Market 5008 Queensbury Road Riverdale, Maryland 20737 (301) 332-6258

Crystal Stewart, Regional Agriculture Specialist (applicant/awardee)
Cornell University Cooperative Extension
Eastern New York Commercial Horticulture Program
141 Fonclair Terrace
Johnstown, New York 12095
(518) 775-0018

Dennis Ebodaghe (peer reviewer)
USDA, National Institute of Food and Agriculture (NIFA)
National Program Leader/Small Farms Program
Washington, the District of Columbia
(202) 401-4385

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.

The Farmers' Market Promotion Program 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 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.

See attached AMS-71, Summary of Information Collection.

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

The 1500 respondents' estimated annual cost in providing information to FMPP is \$461,945.88. This total has been estimated by multiplying 20,988 total burden hours by \$22.01, an average mean hourly earnings by all occupations (cross industry, private, state, and local employees – occupation code 00-0000). Data for computation of this hourly wage were obtained from the U.S. Department of Labor Statistic's publication, "May 2012 National Occupational Employment and Wage Estimates, United States." This publication can also be found at the following website: http://www.bls.gov/oes/current/oes_nat.htm

- 13. PROVIDE AN ESTIMATE 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 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 MAJOR 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 SERVICE, 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.

There are no additional costs associated with this information collection. The Federal government's estimated annual cost for providing oversight and assistance for this information collection is estimated at \$194,778 the first year and for subsequent years it is estimated to be about \$206,978. AMS has implemented numerous program and personnel changes under FMPP, outlined in section A.1., to accommodate the increased numbers of applications and workload to staff. A breakdown of the annual oversight costs is the following:

Salaries/Benefits/FERS Contributions/Awards	\$158,550
Travel	\$6,000
Contracts/Services/Training	\$6,635
Printing/Copying/Mailing/Postage	\$4,275
Rent/Communication/Utilities/FTS	\$3,268
OGC (Legal Services)	\$25,000
Supplies/Equipment	<u>\$3,250</u>
TOTAL	\$206,978

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

AMS will no longer use or require Standard Form 424A, Budget Information-Non-Construction Programs from applicants. No burden is shown in the AMS-71, Summary of Information Collection, since it was approved under OMB# 4040-0006.

AMS has implemented numerous program and personnel changes under FMPP, outlined under question 2 to accommodate the numbers of applications and workload to staff. These changes, however, have not increased the overall estimated burden hours of 20,988; this and all other burden hours are provided in AMS-71, Summary of Information Collection.

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.

The 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.

All forms currently contain 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 compliance with all provisions under Item 19 of OMB Form 83-I.

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

This information collection does not employ statistical methods.