

**1National Institute of Food and Agriculture
U.S. Department of Agriculture
OMB No. 0524-0039
NIFA Grant Application**

1SUBJECT: Supporting Statement for Paperwork Reduction Act Submission to revise the NIFA Grant Application

A. JUSTIFICATION

CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY

The United States Department of Agriculture (USDA), National Institute of Food and Agriculture (NIFA) sponsor ongoing research, education, and extension programs under which competitive, formula, and special awards of a high-priority nature are made. These programs are authorized pursuant to the authorities contained in the National Agricultural Research, Extension, and Teaching Policy Act of 1977, as amended (7 U.S.C. 3101), the Smith-Lever Act, and other legislative authorities.

Before awards can be issued, certain information is required from applicants as part of an overall application. In addition to a project summary, proposal narrative, vitae of key personnel, and other pertinent technical aspects of the proposed project, supporting documentation of an administrative and budgetary nature also must be provided. This information is obtained via applications through the use of federal-wide standard grant application forms and NIFA specific application forms. Because competitive applications are submitted, many of which necessitate review by peer panelists, it is particularly important that applicants provide the information in a standardized fashion to ensure equitable treatment for all.

Similarly, information must be obtained in order to evaluate the impact of the NIFA fellowship and scholarship awards. Such information includes contact information for the fellows/scholars, their progress, and future plans.

NIFA receives applications through Grants.gov and uses standard forms in the SF-424 Research and Related form family and the SF-424 Mandatory form family along with agency-specific forms. Submission through Grants.gov also requires a registration process which include registering in the General Service Administration (GSA) System for Award Management System (SAM).

NIFA is revising this collection as a result of programmatic changes to include the collection of the Letter of Intent (LOI) form.

2. HOW, BY WHOM, AND PURPOSE FOR WHICH INFORMATION IS TO BE USED

The fundamental purpose of the information requested is to provide applicants the ability to provide information that is not obtained in the federal-wide application forms but is necessary for the NIFA proposal and award process. The information is usually only reported to NIFA at the time of award application. Some of the information is used to respond to inquiries from Congress, other governmental agencies, and the grantee community. Records are usually required to be kept for three years after the expiration of the award. Below is a breakdown of the types and uses of information requested:

Letter of Intent Form: The Letter of Intent (LOI) form is used by program staff for program planning and to provide feedback to applicants on the relevance of their idea to the request for application. Program staff use the LOI to determine the potential number of full applications and the potential distribution of applications across the specific science domains covered by the request. Program is then able to more effectively plan for the number of panelists and their scientific expertise. The applicant is either encouraged or discouraged to submit a full application after review of the LOI by program staff. The LOI information collection provides valuable feedback to applicants in judging whether they should commit additional time to the preparation of a full application. Submission of an LOI is required for all grant types except conference grant applications. Applicants who do not submit the LOI by the submission date specified in the Request for Applications are not permitted to submit a full grant application to that program in that fiscal year.

Supplemental Information Form: This form is used in all grant application packages, and collects the program name and program code to which the applicant is applying, additional applicant type information, key words, and the conflict of interest information as an attached file.

Application Type Form: This form is used principally by the Agriculture and Food Research Initiative Competitive Grants Program to collect the specific type of application being submitted.

Application Modification Form: This form has been discontinued and is no longer used.

Form NIFA–2008, Assurance Statement(s): This form is used in formula grant programs and provides required assurances of compliance with regulations involving the protection of human subjects, animal welfare, and recombinant DNA research.

Form NIFA–2010, Fellowships/Scholarships Entry/Annual Update/Exit Form: This form will only apply to recipients of a NIFA award to appoint each student beneficiary, report student progress and the exit of each beneficiary of fellowship or scholarship support towards a higher education degree in food and agricultural sciences. The form will be used to document for fellowship and scholarships, pertinent demographic data on the fellows/scholars, documentation of the progress of the fellows/scholars under the program, and performance outcomes of the student beneficiaries .

3. USE OF IMPROVED INFORMATION TECHNOLOGIES

NIFA has been involved in activities under Pub. L. 106-107, Federal Financial Assistance Management Improvement Act. The purposes of this law were to:

- improve the effectiveness and performance of Federal grant programs,
- simplify grant application and reporting requirements,
- improve the delivery of services to the public, and
- facilitate greater coordination among those responsible for delivering such services.

While Pub. L. 106-107 expired in November 2007 the Grants Policy Committee continues to build on this momentum, advancing existing efforts and leveraging new opportunities to enhance Federal financial assistance. Through such efforts agencies worked together to provide a common electronic portal at Grants.gov (www.grants.gov) for organizations to find and apply for grant programs. Grants.gov is the Federal Government's single site for grant-making agencies and organizations to publish grant funding opportunities and application packages online. Grants.gov enables the grant community to search for grant opportunities, and download, complete and electronically submit applications. In partnership with federal grant-making agencies and the applicant community, Grants.gov established the Standard Forms 424 (SF-424) form families as the core government-wide standard data sets and forms for grant application packages. NIFA uses forms available through SF-424 Research and Related (R&R) form families. In addition, NIFA also uses standard agency-specific forms to satisfy agency collection needs. Electronic submission is required unless exceptions are warranted.

Addition of the LOI form will insure that all potential applicants submit the necessary information in the required format for relevance review. The use of a PDF fillable form will allow additional automation of content and reduce processing burden on program staff, as well as simplifying the LOI preparation and submission process for the applicants.

4. EFFORTS TO IDENTIFY DUPLICATION

NIFA's use of the federal-wide forms reduced duplication efforts and leveraged federal application submission standards. NIFA continues to analyze the data elements in its agency-specific forms to determine if further streamlining is possible.

5. METHODS TO MINIMIZE BUDGET OF SMALL BUSINESSES OR ENTITIES

Small Businesses do submit grant applications to some NIFA programs. All effort are made to collect only the necessary information required to ensure NIFA is in compliance with the rules for the proper administration of the Small Business Innovation Research Program (SBIR). NIFA does use the standard form developed by Grants.gov for collection of SBIR grant application data. This is a recognized federal wide standard form for the collection of SBIR data.

6. CONSEQUENCE IF INFORMATION COLLECTION WERE LESS FREQUENT

Information is collected only when the grantee chooses to submit an application to NIFA for consideration of financial assistance award therefore it is not feasible to collect it less frequently. The submission of information must be timely in order to receive applications in NIFA, properly screen applications, when necessary accomplish steps to

establish and carry out the evaluation process, perform the administrative review of applications recommended for award, and process and issue awards within a pre-established timeframe.

LOI are not used for all NIFA programs. For NIFA programs that require LOIs, submission of an LOI is mandatory for submission of a full application to a program.

7. SPECIAL CIRCUMSTANCES FOR INFORMATION COLLECTION

- Requiring respondents to report information to the agency more often than quarterly:

The agency does not require respondents to report information 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.

The agency usually does not require a written response to a collection of information in fewer than 30 days after receipt of it; the respondents are usually given 30-90 days to respond. However, infrequently for certain grants the agency may require a response in less than 30 days. This could happen if funds were not made available until late in the fiscal year.

- Requiring respondents to submit more than an original and two copies of any document:

NIFA requires electronic submission through Grants.gov. Paper copies are not required. The new LOI form will be submitted directly to program staff via email to a designated email box for each program.

- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

The agency usually does not require respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years after grant close out. However, the Department of Agriculture has established exceptions in 7 CFR 3019.53 in paragraphs (b)(1-4). Examples of exceptions include but are not limited to: 1) a litigation, claim or audit that started before the expiration of the 3-year period; 2) records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.

- 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;

This information collection does not include statistical surveys.

- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

This information collection does not require the use of 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;

This information collection does not require 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.

- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection does not require respondents to submit proprietary trade secret, or other confidential information.

8. FEDERAL REGISTER NOTICE

The notice of intent to revise this information collection appeared in the *Federal Register* on Thursday, November 4, 2014 (79 FR 215). One comment was received by NIFA. NIFA received one comment from the Executive Director of the American Institute of Biological Sciences (AIBS). AIBS was concerned that requiring a preproposal was the first step in creating a process that could limit grant opportunities to new investigators. They cited practices at NSF and a survey regarding NSF's process.

NIFA response: NIFA is not proposing a preproposal with the LOI information collection. NIFA is requesting information regarding applicants' intent to submit a full proposal. While applicants are discouraged from submitting a full application based on a relevancy review of the LOI, they are still permitted to submit a full application. The LOI information collection does not preclude any potential applicant from submitting an application as long as they have responded to the LOI information collection (i.e., submitted the required LOI by the submission date).

CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY

NIFA consulted with applicants to determine burden estimates on the components of this collection. NIFA also coordinates with Grants.gov and with the Research and Related Working Group on forms changes and implementation issues related to NIFA's use of standard grant forms in the SF-424 form families.

Fifteen potential applicants from the University community who had contacted NIFA program staff regarding program relevance were asked to complete the proposed LOI form. Ten potential applicants actually submitted the proposed LOI form. The potential applicants who had successfully submitted a form were informally surveyed regarding the time burden and the format of the form.

NIFA has consulted with the following people regarding the changes to this collection.

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

The agency does not provide payment or gift to respondents, other than remuneration of contractors or grantees.

10. CONFIDENTIALITY PROVIDED TO RESPONDENTS

Applicants are informed that information pertaining to an application is mutually agreed to by the respondent and NIFA to be of a privileged nature and will be held in confidence to the extent permitted by law. Further, individuals that partake in the review of applications must assure s/he will comply with the NIFA Confidentiality Guidelines.

When an application results in an award, it becomes a part of the record of NIFA transactions, available to the public upon specific request. Information that the Secretary determines to be of a confidential, privileged, or proprietary nature is held in confidence to the extent permitted by law. Therefore, applicants are advised that any information that the applicant wishes to have considered as confidential, privileged, or proprietary should be clearly marked within the application. In the event of a paper application, the original copy of an application that does not result in an award will be retained by the Agency for a period of three years and other copies will be destroyed. Such an application will be released only with the consent of the applicant or to the extent required by law. An application may be withdrawn at any time prior to the final action thereon.

11. QUESTIONS OF A SENSITIVE NATURE

Information of a sensitive nature is requested on the Appointment Information section of the “Fellowships/Scholarships Entry/Exit Form.” This information is used to document that discrimination does not occur in the evaluation of NIFA programs. Also, this information may be used to respond to Congressional inquiries regarding gender, race, etc.

None of the other NIFA agency-specific forms collect information of a sensitive nature.

Nothing requested in the Letter of Intent would be of a sensitive nature.

12. ESTIMATE OF BURDEN

The estimate of burden was determined through survey responses with applicants. The burden for each component is estimated in the table below and separate by the affected public.

Estimated Annual Burden

Title	Form Number	Respondents	Number of Responses Per Respondent	Total Annual Responses	Hours per Response	Total Hours
Letter of Intent	N/A	4,858	1	4,858	2	9,716
Assurance Statement (State)	NIFA-2008	2,000	1	2,000	0.5	1,000
Fellowship/Scholarships Entry/Exit Form (State) (inclusive of Conflict of Interest Template)	NIFA-2010	150	1	150	3	450.0
Supplemental Information Form (State) (inclusive of Conflict of Interest Template)	N/A	5,500	1	5,500	2	11,000
Supplemental Information Form (Individual) (inclusive of Conflict of Interest Template)	N/A	50	1	50	2	100.0
Supplemental Information Form (Private)	N/A	600	1	600	2	1200.0
Supplemental Information Form (Federal)	N/A	50	1	50	2	100.0
Proposal Type Form (State)	N/A	2,050	1	2,050	0.25	512.5
Proposal Type Form (Private)	N/A	52	1	52	0.25	12.5

Proposal Type Form (Federal)	N/A	52	1	52	0.25	12.5
TOTAL						24,104

Research and Related Form Family Components Used by NIFA

Component Name	OMB Control Number
SF424 (R & R)	4040-0001
Research And Related Senior/Key Person Profile (Expanded) (Inclusive of the Current and Pending Attachment)	4040-0001
Research & Related Other Project Information (Inclusive of the Project Summary Attachment)	4040-0001
Research & Related Personal Data OMB # 4040-0001	4040-0001
Research & Related Budget OMB # 4040-0001	4040-0001
RR FedNonFed Budget OMB # 4040-0001	4040-0001
Research & Related Subaward Budget (Total Fed + Non-Fed) Attachment(s)	4040-0001
R & R Subaward Budget Attachment(s) Form	4040-0001
SBIR/STTR_Information	4040-0001
Faith Based EEO Survey	1890-0014
Project/Performance Site Location(s)	4040-0010
Budget Information for Construction Programs (SF-424C)	0348-0041

ANNUALIZED COSTS TO RESPONDENTS

Based on an average faculty hourly wage of \$83.75 NIFA estimates the total annual cost incurred by these collection requirements to be \$202,265.

The hourly wage was derived from the American Association of University Professors 2014-2015 Faculty Salary Report data. The average annual associate level professor salary of \$83,751 was used.

13. CAPITAL/STARTUP COSTS

The forms necessary for completion and submission to NIFA for financial assistance are made available through Grants.gov. Grants.gov is available to the public and it is free to use the Grants.gov interface to submit applications. Some applicants utilize Grants.gov’s system-to-system interface in order to submit applications to NIFA. It is difficult to estimate costs associated with the submission of applications in this manner (e.g., start-up costs, continued maintenance of system). It is difficult to predict how many applicants utilize this feature, but the trend has been increasing. Some institutions use service providers at a lower cost than building their own system.

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

It is difficult to estimate the annualized cost to the Federal Government in terms of number of hours expended, salaries, equipment involved, etc., because applications are received throughout the year and the number of applications received varies from year to year. The personnel responsible for processing applications are full-time employees ranging in grade levels from GS-7 to GS-15. NIFA estimates the total cost in personnel time to be \$2,724,585.

Estimated Totals Cost to NIFA

Job Title	Action	Hourly Pay	Hours per Transaction	Total Applications/ Grants	Estimated Costs
Program Assistant, GS-7	Clears exceptions, assembles official jacket	\$23.38	.33	6,200 applications	\$47,835
Program Specialist, GS-11	Evaluates applications for preliminary review and assures all forms have been completed	\$34.60	.25	6,200 applications	\$53,630
Program Manager, GS-15	Evaluates applications, coordinates application reviewers, makes final funding	\$68.56	5	6,200 applications	\$2,125,360

	decisions				
Grants and Agreements Specialist, GS-12	Reviews administrative aspects prior to final award decisions, checks budget amounts, certifications, and related items	\$41.48	4	3,000 grants	\$497,760
TOTAL					\$2,724,585

Dollar amounts derived from the 2015 Federal Pay Tables for Washington DC assuming a step five for each grade level.

15. REASONS FOR CHANGE IN BURDEN

There is a program increase of 9,716 hours due to the addition of the Letter of Intent form. NIFA has increased the formality and use of LOI and this process was omitted from the previous collection and is reported as a violation.” The Application Modification Form is no longer being used it has been discontinued.

16. TABULATION, ANALYSIS AND PUBLICATION PLANS

NIFA has no plans to publish information collected.

17. SEEKING APPROVAL TO NOT DISPLAY OMB APPROVAL DATE ON FORMS

NIFA is not seeking an exemption to display the dates on the forms.

18. EXCEPTION(S) TO THE CERTIFICATION STATEMENT (19) ON OMB 83-I

NIFA claims no exceptions to the certification statement 19 on OMB 83-I.