2016 <u>SUPPORTING STATEMENT</u> (0572-0096)

7 CFR 1703, Subparts D, E, F, and G, Distance Learning and Telemedicine Loan and Grant Program

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The Rural Utilities Service (RUS), an agency of the U.S. Department of Agriculture (USDA), is authorized by Chapter 1 of subtitle D of title XXIII of the Food, Agriculture, Conservation, and Trade Act of 1990 (7 U.S.C. 950aaa et seq.) to provide financial assistance for the purpose of financing the construction of facilities and systems to provide telemedicine services and distance learning services in sparsely populated rural areas. Financial assistance provided under the Distance Learning and Telemedicine (DLT) Loan and Grant Program consists of grants, cost of money loans, or both. The purpose of the DLT Loan and Grant Program is to encourage and improve telemedicine services and distance learning services in rural areas through the use of telecommunications, computer networks, and related advanced technologies by students, teachers, medical professionals, and rural residents. Section 6201 of Title VI of the 2014 Farm Bill (P.L. 113-79) amended 7 U.S.C. 950aaa *et seq*, by extending the term of the program to the year 2018. The Agency administers the DLT Loan and Grant Program through 7 CFR 1703, subparts D, E, F, and G.

2. <u>Indicate how, by whom, and for what purpose the information is to be used.</u> <u>Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection</u>.

Respondents submit application packages to the Telecommunications Program in the Washington, DC office. The application packages are reviewed by the Program staff for eligibility of: (a) the applicant to apply for assistance;(b) the project, including the equipment proposed for that project; and (c) the application package, with respect to demonstration of the regulatory requirements of the application process.

Eligible applicants under this Program are public and private, for-profit and not-for-profit rural community facilities operators, schools, libraries, hospitals, and medical facilities.

The purpose of the information is to determine such factors as:

- Eligibility of the applicant's organization;
- Eligibility of the application through a demonstration that it meets program requirements;

- Specific purpose of the proposed project;
- Compliance with other Federal regulations and policies concerning such areas as: environment, equal opportunity, architectural barriers, flood hazard areas, relocation assistance, drug-free work place, listing in the National Register of Historical Places, debarment and suspension, and lobbying restrictions;
- Cost of the project and degree of participation in the financing from other sources;
- Project feasibility;
- Who will carry out the purposes of the loan and/or grant;
- Time schedule for completion of the proposed project;
- Need for improved educational or medical facilities;
- Employment and economic effect on the rural community; and
- That legal requirements are satisfied.

FORMS CLEARED UNDER OTHER COLLECTION PACKAGES:

<u>Standard Form (SF) 424 – Application for Federal Assistance</u> (cleared under 4040-0004)

This standard Government form, prescribed by OMB Circular A-102, is used to apply for assistance under this program. Applicants use this form to outline scope, costs and expenses for the project.

There are two attachments to the SF-424. One is a *Site Worksheet* (required) and the other is a *Survey on Ensuring Equal Opportunity for Applicants* (optional).

The application must be signed by an authorized representative of the organization who has the authority to commit the organization's resources to carry out the project for the term of the grant.

Request for Advance or Reimbursement – SF 270 (Cleared under 4040-0012)

This standard form is used by the recipient of financial assistance to requisition the approved funds, as prescribed by 7 CFR Parts 3015 and 3016, Uniform Federal Assistance Regulations. The SF 270 Form is cleared under another package but the Agency is responsible to account for the burden hours.

Audit Report – (Cleared under 0572-0095)

Audit reports will be required in accordance with 7 CFR Parts 1773 and 3052 to determine that grant and/or loan funds have been utilized for approved purposes.

<u>AD 3030 - Assurance Regarding Felony Conviction or Tax Delinquent Status for</u> <u>Corporate Applicants (Cleared under 0505-0025)</u>

Corporate applicants (including both for profit and non-profit entities) must assure that entities under their control have not been convicted of a felony under Federal or State law in the 24 months preceding the date of application and that the applicant does not have any unpaid Federal tax liability.

FORMS CLEARED UNDER THIS PACKAGE:

Executive Summary

The Executive Summary gives reviewers their first overall view of the project area, the problems that residents face, and how the proposed project will address those problems. This is your opportunity to discuss the core aspects of the project. It should contain a **concise** description of the project including:

- A description of why the project is needed;
- An explanation of how the applicant will address the need cited, why the applicant requires the financial assistance, the types of education or medical services to be offered by the projects, and the benefits to rural resident;
- A description of the applicant, documenting eligibility;
- An explanation of the total project cost including a breakdown of the grant required and the source of matching contribution and other financial assistance for the remainder of the project;
- A statement specifying whether the project is either a distance learning or telemedicine facility as defined in § 1703.102. If the project provides both distance learning and telemedicine services, the applicant must identify the predominant use of the system;
- An general overview of the telecommunications system to be developed, including the types of equipment, technologies, and facilities used;
- A description of the participating hubs and end user sites and the number of rural residents that will be served by the project at each end user site;

Scoring Criteria Documentation

Scoring is primarily a requirement for 100% Grants. However, 100% Loans and Combos must demonstrate that they meet the same minimum Rurality score required for a 100% Grant.

The applicant must provide information on objective and subjective scoring criteria with the aid of worksheets and provide written documentation for these criteria. The agency uses this information, as part of the competitive scoring process, to decide which projects receive funding.

Objective Criteria

	This criterion measures rural benefit. The score threshold for			
Rural Area (<i>Rurality</i>)	the application to be considered in the competition at all is 20			
	points. This category based on Census data (up to 45 Points).			
	This criterion measures the general economic need of the area			
Economic Need (<i>NSLP</i>)	through the use of statistics from the National School Lunch			
	Program (NSLP) (up to 35 Points).			
Matching Funds (<i>Leveraging</i>)	The DLT program requires a minimum match of 15%. Higher			
	matches receive more points. There are special matching			
	provisions for American Samoa, Guam, Virgin Islands, and the			
	Northern Mariana Islands (up to 35 Points).			

Subjective Criteria

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Additional NSLP	An applicant with NSLP eligibility below 50% may request additional points, and could receive additional points if they can document that the NSLP percentage is not an accurate indicator of the economic need of the area. (up to 10 Points)
Need for Services and Project Benefits (<i>Needs & Benefits</i>)	This criterion compares the specific need for the technology in the proposed service territory, and how the proposed project will address those needs and benefit the residents of the area affected. (up to 45 Points)
Innovativeness	This criterion assesses how the objectives of the proposed project are met in new and creative ways. (up to 15 Points)
Cost Effectiveness	This criterion evaluates the efficiency with which the proposed project and its technology deliver educational and/or medical benefits to beneficiaries. (up to 35 Points)
Special Consideration	RUS will offer special consideration to applications that contain at least one end-user site within a trust area or a tribal jurisdictional area; Strike Force Area; or Promise Zone. Such applications will be awarded 15 points.

Scope of Work

The applicant provides a narrative (with charts, if needed) explaining the Scope of Work. This makes a clear and convincing presentation of how to achieve the goals of the project. The scope of work completes the picture for the reviewer. It discusses how the organization proposes to proceed with the project. **An application that does not include a scope of work cannot be evaluated and could be returned as ineligible.**

The scope of work must include, *at a minimum*, the following:

- **1.** The **specific activities** to be performed under the project;
- 2. Who will carry out the activities;
- 3. The timeframes for accomplishing the project objectives and activities; and

4. A **budget** for all capital expenditures reflecting the line item costs for approved purposes for both the grant funds and the matching funds for the project. Separately, the budget must specify any line item costs that are nonapproved purposes for grants as contained in §1703.123.

<u>Additional Guidance for the Budget:</u> The budget is a required document for RUS to evaluate an application.

- The *Budget* should show each cost as a <u>line-item</u>. The items listed and described in your Telecommunications System Plan should track line-by-line with the entries in the budget.
- <u>Items are not combined into lump sums</u> that cannot be evaluated individually by the Agency. The individual parts have to be evaluated for cost comparison and program eligibility.
- If, in the project, it is required to have to pay a user fee or a license fee to use grant or match purchased equipment, it must be presented as such in the application.
- Detaila such as the brand and model number, must be provided, *i.e.*, "VideoKing TX-90, \$5,600," as opposed to "One Video System, \$75,000 each site;" Installation," \$50,000; or "Wiring, \$100,000."

Financial Information and Sustainability

The applicant must provide a narrative description demonstrating the feasibility of the project, including having sufficient resources and expertise necessary to undertake and complete the project and, how the project will be sustained following completion of the project.

The application needs to show that funding is available for the three-year period that it takes to put together the project (required for eligibility), and to ensure the project's continuance as a viable community resource.

Provide a narrative description that addresses your project's feasibility. The narrative should include a description of the project's leadership, its technical expertise, and how leadership and technical expertise is distributed throughout all of the sites or the service territory. Describe how the flow of funds and institutional financial support (local government, businesses, school system, university or foundation) will sustain the project and maintain a continuity of service.

Your narrative should include all assumptions and the following information:

- A description of the project's revenues and expenses in the project budget;
- Evidence of cost sharing arrangements among hub and end-user sites, if applicable;
- Identification of any other items that may affect feasibility or sustainability of the project.

Statement of Experience

If applicable, the applicant must provide a written narrative describing its capability and experience operating an educational, health care, or any project similar to the proposed project.

Funding Commitments from Other Sources (Grants Only)

In addition to the funds requested from RUS, the applicant must provide evidence that all funds are committed and will be used for the proposed project. For example, a letter from the organization (signed by an authorized official) providing the matching funds is sufficient to meet this requirement.

Telecommunications System Plan (TSP)

A telecommunications system plan consisting of the following:

- (1) The capabilities of the telecommunications terminal equipment, including a description of the specific equipment which will be used to deliver the proposed service. The applicant must document discussions with various technical sources which could include consultants, engineers, product vendors, or internal technical experts, provide detailed cost estimates for operating and maintaining the end user equipment and provide evidence that alternative equipment and technologies were evaluated.
- (2) A listing of the proposed telecommunications terminal equipment, telecommunications transmission facilities, data terminal equipment, interactive video equipment, computer hardware and software systems, and components that process data for transmission via telecommunications, computer network components, communication satellite ground station equipment, or any other elements of the telecommunications system designed to further the purposes of this subpart, that the applicant intends to build or fund using RUS financial assistance.
- (3) A description of the consultations with the appropriate telecommunications carriers (including other interexchange carriers, cable television operators, enhanced service

providers, providers of satellite services and telecommunications equipment manufacturers and distributors) and the anticipated role of such providers in the proposed telecommunications system.

A successful DLT grant application includes a well-planned TSP, starting with a diagram or map of the proposed system overlaid with a geographic map of the service area. Also included in the TSP are other diagrams (if necessary), technical descriptions, and a narrative accounting of each item in the budget.

The TSP shows the sites (hubs, hub/end-users, or end/users) that will participate in the project and where the equipment will be located. It shows how the equipment is interconnected and how the distance learning or telemedicine benefits flow from the hub sites to the rural end user sites.

Telecommunications System Plan Map/Diagram

Attach a map or a drawing which is a spatial representation of the service area encompassing the project, displaying an overlay of your proposed distance learning or telemedicine system, including hub sites and end users. This map can be displayed as a series of maps containing an overview, followed by close-up maps of individual sites.

Each site, hub and end user, must be represented on the map. This representation need not be to scale, but it must be representational of your project, not generic. These generic network diagrams, usually depicting some kind of *campus architecture* are by themselves insufficient. However, applicants can provide a network diagrams (without geographic references) if they can also provide geographic maps that reference the diagram. Nevertheless, an application that does not contain a map that shows each site could be difficult to evaluate thereby losing competitive value when compared to applications that present visual clarity of their project.

- Some items requested for DLT funding will have more general uses than other equipment, which may have 100% distance learning or tele-medical purposes. For each item, specify the percentage of use that can be attributed to purposes that meet the DLT grant definition of distance learning and/or telemedicine, explain how you've determined those percentages and addressing the capabilities of the proposed equipment/software. *The percentage of use is only to be used for analysis as part of line item explanations*. Do not breakout items in the actual budget by percentage of use.
- Document your discussions with various technical sources, such as consultants, engineers, product vendors or internal technical experts.
- Address whether or not any part of the project will duplicate any adequate, established telemedicine or distance learning services already in operation. In particular, discuss how match and grant funding for this project, if approved, would

complement previous efforts. Describe the status of previous projects and, in particular, the extent to which the funds have been drawn for eligible grant purposes. Please note that you will need to complete a *Non-duplication of Services* Certificate, which is part of the certification section. The form is located in the *Toolkit*.

- Identify any previous grants that the applicant has received from our Agency in the previous three grant cycles (2012, 2013 & 2014) and how they would affect the project proposed in the current application.
- This applies not only to prior grants received by the current applicant, but to grant funding that may have gone to any of the <u>end-users</u> in the current proposal via a grant received by another entity.
- Discuss how match and grant funding for this project, if approved, would complement previous efforts. Specify the progress/status of any previous awards and the extent of grant and match funds expended toward completing those projects.
- Discuss whether or not any of the sites in the current project are included as participants in another application for a Fiscal Year 2016 DLT Grant.
- In the absence of any explanation, overlaps in projects are assumed to be duplication and, as a consequence, scores could be negatively affected in the criterion of Needs and Benefits.

Compliance with other Federal Statutes

Appendix A contains certification forms to demonstrate compliance with other Federal statutes and regulations. There are ten required certifications and we have numbered them H-1 through H-10 so that you can see at a glance if they are all in your application. Applications submitted without a non-duplication certification will be assumed that the project is duplicative in the services offered and will be returned as ineligible.

Important Note: If you are applying as a consortium which does not have the legal authority to apply (See Eligibility Requirements on Page 4 of the Application Guide with respect to Legal Eligibility), each entity that comprises the consortium must provide a set of these certifications.

Equal Opportunity and Nondiscrimination Certification

This information is required by U.S. Title VI of the Civil Rights Act of 1964, as amended, section 504 of the Rehabilitation Act of 1973, as amended, the Age

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Discrimination Act of 1975, as amended, and Executive Order 11246, Equal Employment Opportunity, as amended.

Certificate Regarding Architectural Barriers

This information is required by the Architectural Barriers Act of 1968, as amended.

Certificate Regarding Flood Hazard Area Precautions

If the project is in an area subject to flooding, flood insurance must be provided to the extent available and required under the Flood Disaster Protection Act of 1973, as amended.

Certification Regarding Uniform Relocation Assistance

This certification assures that the recipient of financial assistance will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 Certification

Form AD-1049 -Certification Regarding Drug-Free Workplace Requirements <u>Alternative I – For Grantees Other than Individuals</u> (This form is approved under OMB 0505-0027 but the burden hours are accounted for in this collection package.)

This certification is required by the regulations implementing section 5151-5160 of the Drug-Free Workplace Act of 1988 (7 CFR 3017.600).

<u>Form AD-1047 - Certification Regarding Debarment, Suspension, and Other</u> <u>Responsibility Matters – Primary Covered Transactions (</u>This form is approved under OMB 0505-0027 but the burden hours are accounted for in this collection package.)

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension (7 CFR 3017.510).

<u>Certification Regarding Lobbying for Contracts, Grants, Loans, and Cooperative</u> <u>Agreements</u>

This certification is required by U.S.C. Title 31, Section 1352 for financial assistance in excess of \$100,000. If the applicant is engaged in lobbying activities, a completed disclosure form, Disclosure of Lobbying Activities, is also required (7 CFR Part 3018).

Non Duplication of Services Certificate

Applicants must certify that the facilities financed with the funding received will not duplicate adequate telemedicine and/or distance learning services.

Federal Debt Certification

The applicant must provide certification that it is not delinquent on any Federal debt and understands the actions the government may take if it fails to make scheduled payments.

Environmental Impact and Historic Preservation

The applicant must provide details of the project's impact on the environment and historic preservation. The application must contain a separate section entitled "Environmental Impact of the Project." Applicants may use Attachments in the Application Guides to help in complying with this requirement.

Evidence of Legal Authority to Contract with the Government

The applicant must provide evidence demonstrating its legal authority to enter into a grant agreement with RUS and perform the activities proposed by the project. Satisfactory documentation includes, but is not limited to, Articles of Incorporation, Bylaws, Board Resolutions, excerpts from State Statutes, or an attorney's opinion of counsel.

RUS now accepts an active registration in the System for Award Management (SAM) as evidence of legal existence and legal authority to contract with the Federal Government.

Evidence of Legal Existence

The applicant must provide evidence demonstrating that it is legally recognized under State and Federal law. Satisfactory documentation includes, but is not limited to, certificates from the Secretary of State, State statutes or laws establishing your organization.

Consultation with USDA State Director – Rural Development (Grants Only)

The applicant must provide evidence that it has consulted with the USDA State Director – Rural Development concerning the availability of other sources of funding available at the State or local level.

State Strategic Plan Conformity (Grants Only)

The applicant must provide evidence from the USDA State Director – Rural Development that the application conforms with the State strategic plan as prepared under section 381D of the Consolidated Farm and Rural Development Act (7 U.S.C. 1921 et seq.). (The applicant should indicate if such a plan does not exist.)

AWARDED GRANTS AND LOANS ONLY

<u>Updated Information for Preparing Legal Documents and Execution of Legal</u> <u>Documents</u>

After an applicant has been selected for a grant and/or loan, the Agency will prepare a Grant Agreement, a Combination Loan/Grant and Security Agreement, or a Loan and Security Agreement, outlining any agreement, certifications, legal opinions and terms and conditions for the grant and/or loan. Execution of these documents is necessary to protect the integrity of the program and the interest of the parties.

Evidence of Fidelity Bond Coverage

Fidelity bonds are required for an amount equal to 15 percent of the greatest amount of funds on hand by a recipient of financial assistance. This is to ensure that if funds are somehow lost, stolen, misappropriated, etc., that the actual loss to the recipient of financial assistance will be mitigated and that purposes of the grant and/or loan will continue.

Project Performance Report

This information will allow RUS to ensure that the interests of the government are being protected and the goals and objectives of the program are being met. The report will be prepared by the recipient of financial assistance on an annual basis while the grant and/or loan funds are being expended to report on the progress in implementing the project; this will include information on the comparison of actual accomplishments to the objectives established for the period, reasons why established objectives may have not been met, descriptions of any problems, delays or adverse conditions, and timetables established for the next reporting period.

Recordkeeping Requirements

Recipients of financial assistance must maintain financial management systems and retain financial records in accordance with terms and conditions of the grant or loan. Grantee

and borrower records must include an accurate accounting and must document how these funds are used.

3. <u>Describe whether, and to what extent, the collection of information involves the</u> <u>use of automated, electronic, mechanical, or other technological collection</u> <u>techniques or other forms of information technology, e.g. permitting electronic</u> <u>submission of responses, and the basis for the decision for adopting this means of</u> <u>collection</u>.

The Agency accepts electronic applications through Grants.gov. Applications were first accepted electronically in Fiscal Year 2005. The table below shows the electronic submission statistics for the last four years.

FY /	Total Apps /	Grants.go v apps /	percentag e	
2016	182	124	68.13%	
2015	191	85	44.50%	
2014	158	22	13.92%	
2013	200	28	14.00%	
cumulativ e	731	259	35.43%	

4. <u>Describe efforts to identify duplication</u>. <u>Show specifically why any similar</u> <u>information already available cannot be used or modified for use for the purposes</u> <u>described in Item 2 above</u>.

The documentation required by this collection deals with a specific project that the applicant will be completing, no general data collection is involved. There are no similar programs conducted across the Federal Government in which a duplication of information would already exist.

5. <u>If the collection of information impacts small businesses or other small entities</u> (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The Agency has tried to design the format of the information required in order to minimize the burden on small entities. In addition, the Agency has compiled user friendly Application Guides to enable entities to create a successful application package. The Telecom Program believes that the information collected is the minimum needed by the Agency to approve grants/loans and monitor the grantee/borrower performance.

6. <u>Describe the consequences to Federal program or policy activities if the collection</u> <u>is not conducted or conducted less frequently, as well as any technical or legal</u> <u>obstacles to reducing burden</u>.

If the collection of information were conducted less frequently, it could have an effect on the Agency's ability to administer the grant and loan program. The Agency must determine that the grant/loan funds are to be used by the eligible applicants for authorized purposes.

7. <u>Explain any special circumstances that would cause an information collection to be conducted in a manner</u>:

a. <u>Requiring respondents to report information more than quarterly</u>. There is no requirement to respond more than quarterly, unless information is needed from the applicant, in which case the applicant has 15 working days to provide the information.

b. <u>Requiring written responses in less than 30 days</u>. There is no requirement for a response in less than 30 days, except for those applicants that appeal the scoring process, in which case they have 10 days to file an appeal of the scoring results.

c. <u>Requiring more than an original and two copies</u>. An original and two copies of the application are sent to USDA, plus a copy to the State Government point of contact.

Note that no copies are required to be provided when an applicant utilizes grants.gov to submit their application.

d. <u>Requiring respondents to retain records for more than 3 years</u>. There is no such requirement because projects are required to be completed within 3 years..

e. <u>That is not designed to produce valid and reliable results that can be generalized to the universe of study</u>.

This collection does not involve a survey.

f. <u>Requiring use of statistical sampling which has not been reviewed and approved by</u> <u>OMB</u>.

This collection does not involve statistical sampling.

g. <u>Requiring a pledge of confidentiality</u>. There is no requirement for a pledge of confidentiality.

h. Requiring submission of proprietary trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. 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, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

As required by 5 CFR 1320, 8(d), a Notice to request public comments was published on May 19, 2016 at 81 FR 31591. No comments were received.

RUS has contacted the following three program recipients to determine their views on the information collection:

Mark Renfro, Executive Director HealtHIE Georgia Corporation 331 Ridgecrest Circle. Suite 1 North Clayton, GA 30525 706-782-0764 O marenfro@outlook.com

Nancy Shepard Associate Dean, Learning Resources College of the Siskiyous 800 College Avenue Weed, CA 96094 (530) 938-5881 <u>shepard@siskiyous.edu</u>

Beau Sherman Regional Distant Learning & Video Production Coordinator for Education Southwest Georgia Regional Services Agency (SGGSA) Community Network Services (CNS) 30 E. Broad St. Camilla, Georgia 31730 (229) 873-3326 shermanbeau@gmail.com

All three offered favorable comments on the application process for the DLT program.

9. <u>Explain any decision to provide any payment or gift to respondents, other than</u> reenumeration of contractors or grantees.

Payments or gifts are not provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy.

The information collection does not require confidentiality. Information submitted to RUS by borrowers is covered by the provisions of the Freedom of Information Act (5 U.S.C. 552).

11. <u>Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private</u>.

There are no questions of a sensitive nature.

12. Provide estimates of the burden hours for this collection of information.

Regulation	Number of Respondents	Total Annual Responses	Total Annual Burden Hours	Total Annual Recordkeeping Burden	Total Annual Hours
7 CFR Part 1703, Subparts D, E, F, and G	190	4,866	11,499	650	12,149

This renewal submission is for the following:

Based on program experience of the past three years, it is estimated that an average of 190 grant applications will be submitted annually, and 76 grants will be awarded. At present no funds are appropriated for loans or loan/grant combos. We estimate the total burden required to comply with this collection of information is approximately 52 hours for each grant application.

Benefit rates for private sector employees in Private trade, transportation, and utilities industry workers is provided by Bureau of Labor Statistics Historical Date issued in September 2015. See: Employer Costs for Employee Compensation, Supplemental Tables, Historical Data, December 2006 – September 2015, page 91. Retrieved from http://www.bls.gov/ncs/ect/sp/ecsuphst.pdf. Benefit as a percentage of total compensation for private sector employees in the utilities industry in September 2015 was 29.8%.

Award recipients are estimated to require an additional 16 hours for reporting and 11,449 hours of burden for recordkeeping activities to comply with this collection of information. A breakdown of the reporting and recordkeeping requirements is provided on the attached Summary of Information Collection. Cost estimates are based on experience, discussion with program staff that operates the program, and comments from grant recipients._

The 'Cost to the public' wage figures used are from the "May 2015 Occupational Employment and Wage Estimates" at http://www.bls.gov. National 4-digit NAICS Industry-Specific estimates are used. The table (spreadsheet) is nat4d_M2011_dl.xlsm from the zip file oesm15nat.zip. The industry used is Wired Telecommunications Carriers. For 'Professional' time an hourly wage of \$53.47 plus \$15.93 benefits for 'Managers, All Other (11-9199)' is \$69.40 used for managers. For 'Clerical' time an hourly wage of \$16.70 plus \$4.97 benefits for 'Office and Administrative Support Workers, All Other (43-9799)' is \$21.67 used for clerical.

The following is a breakdown of the costs to the public:

COST TO THE PUBLIC

1. Reporting

Professional 190 grant applicants	Х	41.29 hours	X \$69.40 =	\$ 544,449
Clerical 190 grant applicants	X	10.32 hours	X \$21.67 =	\$ 42,490
Professional 76 recipients	Х	9.20 hours	X \$69.40 =	\$ 48,524
Clerical 76 recipients	Х	2.30 hours	X \$21.67 =	\$ 3,787
2. Recordkeeping				
Professional 76 recipients Clerical	X	2.80 hours	X \$69.40=	\$ 14,768
76 recipients	Х	5.20hours	X \$21.67 =	\$ 8,563
TOTAL COST TO THE PUBLIC =				\$ 662,581

13. <u>Provide an estimate of the total annual cost burden to respondents or record</u> <u>keepers resulting from the collection of information</u>.

(a) <u>Total capital and start-up cost component (annualized over its expected useful life); and</u>

There are no capital and/or start-up costs components associated with this collection.

(b) Total operation and maintenance and purchase of services component. There are no operation and maintenance and/or purchase of services component associated with this collection.

14. Provide estimates of annualized cost to the Federal Government.

The cost to the Federal government is estimated to be \$135,894. Costs are based on experience and calculated at a rate of \$48.35/hr (GS – 13/5) plus 36.25percent for benefits for professional time and \$20.63/hr (GS-6/5) plus 36.25 percent benefits for clerical time. RUS anticipates receiving 190 applications and making awards to 76 recipients. RUS has also included Administrative and Travel costs which are used to promote the program across the U.S. These costs were calculated using the OPM pay scale from 2012, when this package was completed. COST TO THE FEDERAL GOVERNMENT

TOTAL COST TO THE GOVERNMENT = 5				\$160,600	
Post Award C	lerical Time	76 X 5 hrs.	X \$38.38	=	\$14,584
Post Award P	rofessional Time	76 X 5 hrs.	X \$65.93	=	\$25,053
Clerical Time	Spent on Applications 190 Applications	X 4 hrs.	X \$28.10	=	\$21,356
Professional F	Review of Applications 190 Applications	X 7 hrs.	X \$65.87	=	\$87,607
Travel & Administrative				\$ 12,000	

² Cost of total benefits as a percentage of total hourly compensation for civilian Federal Government employees exceeds that of private sector employees. OMB Memoranda indicate that the total Federal civilian position full fringe benefit cost factor is 36.25% *See OMB Memoranda M-08-13(March 11, 2008)*.

15. Explain the reasons for any program changes or adjustments reported in items <u>13 or 14 of the OMB Form 83-1</u>.

This is an extension of a currently approved information collection package. There is a reduction of 1,607 burden hours (12,638 to 11,031) in this submission. The reduction is a result of a decrease in respondents from 210 to 190 and the burden for the SF - 424 and 270 is now accounted for under an RCF.

16. <u>For collection of information whose results will be published, outline plans for tabulation and publication</u>.

There are no plans for publication.

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.

No such approval is requested.

18. <u>Explain each exception to the certification statement identified in item 19 on</u> <u>OMB 83-1</u>.

There are no exceptions.

B. <u>Collection of Information Employing Statistical Methods.</u>

This information collection does not employ statistical methods.