

Supporting Statement for Paperwork Reduction Act
Special Nutrition Programs (SNP)

Justification for Adding

USDA Farm to School Request for Applications

List of Approved Programs Using Uniform Grant Application for
Non-Entitlement Discretionary Grants,
RFA: OMB Control Number 0584-0512

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended Section 18 of the Richard B. Russell National School Lunch Act (NSLA) to establish a Farm to School program in order to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve access to local foods in eligible schools.

To fulfill the farm to school mandate in the HHFKA, effective October 1, 2012, \$5 million will be provided to the United States Department of Agriculture (USDA) on an annual basis to support grants, technical assistance, and the Federal administrative costs related to USDA's farm to school program. The USDA Food & Nutrition Service (FNS) is charged with implementing this new competitive grants program and intends to solicit applications for Farm to School Planning, Implementation, and Training grants. In order to select the most appropriate grantees, a competitive request for applications is

necessary. Eligible entities will prepare an application. As a part of the application process, applicants will complete the Farm to School Grant Program Application Coversheet (OMB Control Number: 0925-0002, Expiration Date: 09/30/2015) which provides critical information needed during the review process in order to select the most qualified and diverse candidates. FNS mentioned this form in the RFA; unfortunately we did not include this document at the time of the primary clearance of our grant request.

We request that the data elements of the Farm to School Grant Program Application Coversheet, baseline, final and quarterly progress reports are cleared. Templates for each of these forms have been attached separately.

This is a update to the prior Farm to School Request For Application (RFA). FNS will post the RFA package for the *Farm to School Grant Program* on its website on or about September 12, 2017 at <http://www.fns.usda.gov/cnd/f2s/> and on www.grants.gov.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant/cooperative agreement applications and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The selection criteria are contained in the RFA package. This process will occur once a year for the foreseeable future. The Office of Community Food Systems has mandatory

authorization to administer the Farm to School Grant Program until section 243 of HHFKA is modified or removed.

The following forms are required of grant applicants:

1. Application and Instruction for Federal Assistance (SF424)
2. Budget Information and Instruction (SF-424A)
3. Assurance-Non-Construction Programs (SF-424B)
4. Federal Financial Report (SF-425)
5. Disclosure of Lobbying Activities (SF LLL)
6. Farm to School Grant Program Application Cover Sheet
7. Representations Regarding Felony Conviction And Tax Delinquent Status For Corporate Applicants (AD 3030)
8. Grant Program Accounty System & Financial Capability Questionnaire
9. Quarterly Progress Report
10. Baseline Report
11. Final Report

In addition to the SF-424 family of forms found on grants.gov under “active forms” at this link: <https://www.grants.gov/web/grants/forms/sf-424-family.html#sortby=1>

Sections 738 and 739 of the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2012 (Public Law 112-55)

Corporate Felony Convictions and Corporate Federal Tax Delinquencies, excluding State, Local and Tribal Government, require that all other applicants, excluding State, Local and Tribal Government, fill-out and submit an Assurance Statement with their

completed RFA package (form AD 3030, OMB Control No.: 0505-0025, Expiration Date: 4/2019). The Farm to School Grant Program Application Coversheet is a form that is integrated into the RFA, requesting summary information from the applicant regarding the submitted grant proposal such as project description, number of students impacted, funding amount requested, etc..

Applicants selected for award are required to submit a quarterly progress report and a quarterly Federal Financial Report (SF 425, OMB Approval Number: 0584-0594, Expiration Date: 6/30/2019) throughout the term of the grant. Additionally, awardees are required to submit a baseline report at the beginning of the grant term and a final report at the end the grant term. FNS estimates that approximately 100 percent of the entire collection will be collected electronically. All of our Standard Forms (SF) referred to as “common forms” are submitted one time at the time of the application, pre-award.

There are no post-award burden hours only responses.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In compliance with E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the application from the www.grants.gov website. All applicants will apply for this opportunity directly through www.grants.gov. FNS will not accept emailed faxed, or hand delivered applications.

FNS estimates that 100 percent of the grant awardees will report financial data electronically through FNS' Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx> using the SF-425 form. See associated attachments for a series of screenshots of FPRS, the online portal where applicants submit the SF-425 Federal Financial Report.

3. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

There is no similar data collection effort available. This program solicitation is new and unique. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely administers the school meal programs. The information required for this request for application is not currently reported to State Agencies on a regular basis in a standardized form.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information request is held to the minimum amount required. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Circumstances limit the flexibility in modifying the reporting and recordkeeping requirements. FNS estimates that 25 percent of our respondents are small entities out of the 160 Business that we anticipate will submit an application.

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

FNS will seek minimal information that will be critical in selecting the most promising grantees. The consequence for not collecting the information is the inability to administer the Farm to School Grant Program as mandated by Congress in the HHFKA.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe

actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice was published in the Federal Register on November 23, 2015 at 80 FR 72945 soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

There are no plans to provide cash payments or gifts to respondents.

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

Provision of the application information requested is entirely voluntarily. The collection of this information is for the purpose of aiding in the review of applications prior to grant award decisions and for management of grants. This information will be used within FNS and may also be disclosed outside FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement respect the existing policy with regard to privacy. FNS will work with the Grantee and ensure that any release of such information is done under the Terms and Conditions of the existing

Freedom of Information Act that requires that the Grantee provides release permission and is informed of the use of the information. The Terms and Conditions have been attached separately.

Grantees who are awarded an Planning, Training, Implementation Grants will be required to submit the SF 425 forms online. All of the SF-425 forms are stored in a secured database. Therefore, Implementation grant awardees must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business with the Food and Nutrition Service. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature included in this data collection.

- 12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

- A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Pre-Award Annual Burden

All of our Standard Forms (SF) referred to as “common forms” are submitted one time at the time of the application, pre-award and the burden time displayed on the RFA takes those forms into consideration. FNS plans to use the administrative determined form (AD 3030 titled Representation Regarding Felony Convictions and Tax Delinquent Status for Corporate Applicants) approved under OMB Control No.: 0505-0025, Expiration Date: 4/2019. Each responded will submit this form with their proposal before funding is determined and awarded. FNS is seeking to use 266.25 burden hours for AD 3030. Approximately 355 respondents will respond 1 time with their proposal for a total number of annual responses of 355 for AD 3030; this form (AD3030) will take approximately 15 minutes (0.25) per respondent for a total annual burden estimates of 88.75 burden hours annually $\times 3 \text{ years} = 266.25 \text{ burden hours for 3 years}$. The burden associated with this form is discussed here but not accounted for in our overall estimates to avoid duplication with USDA/OCIO who has already accounted for these burden hours.

FNS estimates that approximately three hundred fifty-five [(355) respondents; 195 States, Local, and Tribal Agencies and 160 Business] will submit an application for the Farm to School Grant Program. It is estimated that the average applicant will spend 60

hours developing their proposals. This is based on the general fact that applicants will have about six weeks to complete their proposals. We expect school district and schools will represent the majority of submissions, while businesses will constitute the remaining submissions. The 60 hour burden estimate includes developing, completing and submitting many of the required forms noted in question 2. The total estimated pre-award burden is reflected in the following table:

A.12.1 Estimate of Hours Burden on Respondents for Application Pre-Award Burden

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
State, Local and Tribal Agencies	195	1	195	60	11,700
Businesses	160	1	160	60	9,600
Total Burden	355	1	355	60	21,300

Pre Award Reporting Burden Summary:

Number of Respondents: 355

Responses per respondent: 1

Total Annual Response: 355

Hours per Response: 60

Total Burden Hours: 21,300

Post Award Annual Burden

Out of 355 Applicants, FNS anticipates awarding grant funding to 80 Grantee Applicants (60 States + 20 Business). We estimate that (a) 20 Planning, (b) 48 Implementation and Support Service, and (c) 12 Training grants will be selected and awarded for funding.

There are three types of reports that awardees may submit post-award:

- **Quarterly Progress Report:** The Quarterly Progress report will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. The grantee will submit this report 4 times each year. This report is routine in nature and only requests necessary information to monitor the progress of the grantee during the course of the grant term. FNS estimates that awardees will spend one hour on each Quarterly Progress Report. These reports are submitted online via customized URLs using Qualtrics: <https://www.qualtrics.com>. Each grantee receives a unique URL via e-mail in order to access and complete the Quarterly Progress Report. Please see attachments for screenshots of the Qualtrics portal.
- **Federal Financial Report (SF-425):** The SF-425 Federal Financial Report is also submitted quarterly and it is due at the same time as the Quarterly Progress Report. The SF-425 is the short form for reporting the grantee's financial status for the previous period. The grantee will submit this report four times each year. This report is routine in nature and only requests necessary information to monitor the funds spent during the

period of performance of the grant or cooperative agreement. FNS estimates the awardees will spend one hour on each each financial report. A final SF-425 is submitted 90 days after the end of the grant term. This means that in the final year of grant term, the grantee submits five SF-425 financial reports in total.

- **Final Progress Report:** The final progress reporting template will include basic monitoring questions and questions from the baseline survey to help program staff assess the impact of the overall project. Due to the inherently different nature of Planning and Implementation grants versus Training grants, Planning and Implementation grantees receive one set of standardized questions while Training grantees receive another set of questions. Both sets of questions seek to assess the impact of the overall project. FNS estimates the awardees (Planning, Implementation and Training) will spend 1 hour to complete the final progress report. This Final Progress Report is submitted once, at the end of the grant term. This report is submitted online via customized URLs using Qualtrics: <https://www.qualtrics.com> (see screenshots included with this request). Each grantee receives a unique URL via e-mail in order to access and complete the Final Progress Report.
- **Baseline Survey:** The baseline survey will establish the existing state of farm to school activities in order to ultimately measure program impact. FNS estimates the awardees will spend .5 hours on the baseline survey.

Training grants do NOT complete a baseline survey only planning and implementation grants submit a baseline survey. This survey is collected once, at the beginning of the grant term. This report is submitted online via customized URLs using Qualtrics: <https://www.qualtrics.com>. Each grantee receives a unique URL via e-mail in order to access and complete their Baseline Survey. Although there is discussion about how long activities take during the post-award, there are no post-award burden hours accounted for only we are only seeking clearance for the total annual responses for in this collection.

Planning, and Implementation grants post-award burden hours are based on the production of quarterly progress and financial reports, and the Final Progress Report (thus this estimates burden hours during the last year of the grant term). Planning and Implementation grants run 12 or 24 months as determined by individual grantees. For the calculations provided in the tables below, estimates are determined based on annual burden hours. To streamline calculations for Planning and Implementation Grants, estimates will assume the submission of ten (10) reports annually which includes four (4) Quarterly Progress Reports, five (5) Financial Reports (SF-425) and a (1) Final Progress report. Therefore this calculation provides burden hour estimates for the final year of the grant term. Calculating burden hours for the final year of the grant term provides the maximum number of burden hours, as the Final Progress Report requires one hour to complete while the Baseline Survey only requires 30 minutes.)

Training grants post-award burden hours are based on the production of quarterly progress and financial reports, and the Final Progress Report. Burden hour estimates for training grantees will be annualized. Training grants are awarded for a 12 month period, and thus the grantee will submit ten reports in total, which includes four Quarterly Progress Reports, five Financial Reports (SF-425), and a Final Progress Report.

Please note that due to the assumptions used (outlined above) to calculate post-award annual burden, hours and reporting requirements are equal for all three grant tracks: Planning, Implementation and Training. The total estimated post-award burden is reflected in the following table:

A.12.2 Narrative for Post Award Reporting Burden Hour Estimates Annualized for Affected Public: 60 State, Local and Tribal Agencies (SLT)

The burden hours for common forms have been pre-approved by OMB. This is for informational purposes only and we are only seeking approval for the total annual responses for post-award estimates. Thus, FNS is only discussing time for common forms only to capture the cost associated with these forms. The total burden hours estimates for these common forms (aka Standard Forms (SF)) is [800 reporting (200 for Businesses + 600 for States) + record keeping 99 (23.40 for business + 75.60 for States)] and there are 1,640 total annual responses (1,440 for States and 200 for business) are covered under the following OMB numbers below: SF 425 (OMB Control No.: 4040-0014 Expiration 1/2019 & OMB Control No.: 0584-0594 Expiration: 6/2019); SF-424 (OMB Control No.: 4040-0004 Expiration: 12/2019); SF424A (OMB Control No.: 4040-0006, Expiration: 1/2019); SF-

424B (OMB Control No.: 4040-0007 Expiration 1/2019); SF LLL (OMB Control No.: 4040-0013, Expiration: 1/2019) and AD 3030 (OMB Control No.: 0505-0025, Expiration Date: 4/2019). These hours are identified but not accounted for in this request. Reporting burden estimates below do not include the SF 424, 424A, 424B, LLL, the AD 3030, the Farm to School Grant Program Application Coversheet, nor the Grant Program Accounting System & Financial Capability Questionnaire because these forms are completed pre-award only; for the post award reporting we are only seeking clearance for the total annual responses since the burden times have been already been approved by OMB (see OMB# for common forms above).

A.12.2 Post Award Reporting Burden Hour Estimates Annualized for Affected Public: SLT and Business.

Instrument	Number Respondents	Response per Respondent	Total Response
SF 425 (5) Financial Report + (4) Quarterly Progress Reports + one Final Progress Report	60	10	600
<i>Sub -Total State Agencies</i>	<i>60</i>	<i>10</i>	<i>600</i>
SF 425 (5) Financial Report + (4) Quarterly Progress Report + one Final Progress Report	20	10	200
<i>Sub-Total Business</i>	<i>20</i>	<i>10</i>	<i>200</i>
<i>Grand Total</i>	<i>80</i>	<i>10</i>	<i>800</i>

Please note that these estimates are annualized. The baseline survey is not represented in the tables because in a single year a grantee completes either the baseline survey or the final report. There are no reporting burden hours only responses for the SF 425, Quarterly and Final Progress Reporting. All other Standard forms have recordkeeping only since those are submitted at the time of proposals.

Standard Forms 425 Total Annual Responses for Post Award Reporting Burden Summary only for both States, Local, Tribal Agencies and Business-not-for-profits:

Number of Respondents: 80 [60 SLT + 20 Business]

Responses per respondent: 10

Total Annual Response: 800 [600 SLT + 200 Business]

The total estimated pre- and post award reporting burden is recorded below.
Pre-and Post Award Reporting Burden Summary for States and Businesses:

Number of Respondents: 355 pre-award applicants (195 SLT + 160 Business) and 80 post award (60 SLT + 20 Business)

Responses per respondent: 1 (pre-award) and 27 (post award; 14 for SLT + 13 for Business)

Total Annual Response: (355 pre-award responses + 1,640 post-award responses) = 1,955

Hours per Response: 10.89514 average response time (for pre and post award combined)

Total Burden Hours: (21,300 pre-award)

Although there are 800 post-award reporting burden hours (200 for business & 600 for States) for the SF 425 which is 1 hour per post-award reporting requirement) we are not requesting this in the burden estimates only accounting for the responses and the cost to respondents.

A.12.3 Post-Award Recordkeeping Burden Estimates Annualized (Affected Public: 60 State Agencies, Local and Tribal)

AFFECTED PUBLIC	Form Number or activity	No. Recordkeepers	No. Records Per Respondent	Est. Total Annual Records
State Agencies, Local and Tribal (SLT)	RECORDKEEPING (60 SLT respondents in total)			
	SF-424 A & B	60	1	60
	SF-LLL	60	1	60
	SF-424	60	1	60
	SF-425 Financial Reporting	60	4	240
	One Final Financial Report (SF 425)	60	1	60
	(4) Quarterly Progress Reports	60	4	240
	(1) Final Progress Report	60	1	60
Post Award Recordkeeping Total		60	14	780

Burden Estimates			
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Please note that this table does not include the Farm to School Cover Sheet nor the Grant Program Accounting System & Financial Capability Questionnaire as these forms do not have an associated recordkeeping burden. Grantees are not required to maintain these records. Although there are (600 SLT reporting burden hours + 200 Businesses) post award reporting burden hours and the 75.60 for SLT recordkeeping + 23.40 for Businesses these burden hours for Standard Forms are approved under other OMB Control Numbers. We are only accounting for the total annual responses.

A.12.4 Post-Award Recordkeeping Burden Estimates Annualized (Affected Public: 20 Business-for-not-for-profit)

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cxd)
Business Private Non-Profit entities	RECORDKEEPING (20 business respondents in total)			
	SF-424 A & B	20	1	20
	SF-LLL	20	1	20
	SF-424	20	1	20
	SF-425 Financial Reporting	20	4	80
	One Final Financial Report	20	1	20
	(4) Quarterly Progress Report	20	4	80
	1 Final Progress Report	20	1	20
Post Award Recordkeeping Total Burden Estimates		20	13	260

Post Award Recordkeeping Burden Summary for State Agencies, Local, Tribal and Business, Private Non-Profit Entities:

Please note that these estimates in the summary below do not include the SF forms.

Number of Respondents: 80 (60 SLT + 20 businesses)

Responses per respondent: 27 (14 responses from SLTs and 13 responses from businesses)

Total Annual Response: (840 from SLTs + 260 from businesses) = 1,100

Hours per Response: 0.08 (0.08 for SLTs and 0.08 for businesses)

Although there are 99 post-award recordkeeping burden hours for the SF 425 which is for SLT (75.60) and Business (23.40) requirement) we are not requesting this in the burden estimates only accounting for the responses and the cost to respondents.

The total estimated burden hours for pre & post-award reporting and post award recordkeeping is 21,300 (pre-award 21,300 burden hours). This calculation does not include burden hours for SF forms which is 899 additional burden hours for this collection since those are already approved in the common forms OMB collection cited above (800 post-award reporting burden hours + 99 for recordkeeping burden hours).

The total estimated number of responses for pre & post reporting and recordkeeping is 2,255 total annual responses [1,635 for SLT + 620 for Business] (this includes pre-award 355 responses + post-award reporting responses 800 and post award recordkeeping response 1,100 = (840 for SLT and 260 for Business). For the next three years, we are requesting 6,765 responses (2,255 x 3 years). We are requesting 63,900 total burden hours for the next three years (21,300 estimated burden hours for pre award x 3 years) we did not include the post award or recordkeeping burden hours since those are already approved, there is no duplication, we are only seeking the burden hours pre-award and the total annual responses pre award, post award and recordkeeping.

The total estimated annual cost to respondents is \$855,283.94 (\$815,151 pre award reporting cost to the public + \$40,132.94 post award reporting and recordkeeping burden). This estimate *does* include SF forms. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for Social Scientists and Related Workers, All Others - Occupation Code 19-3099 (according to the Bureau of Labor Statistics, Occupational Employment Wages May 2016).

Total Pre-award reporting cost to the public was calculated by estimating 355 applicants will spend approximately 60 hours each at \$38.27 hourly wage = \$815,151 (472,032.86 for SLT + \$383,251.08 Businesses). Pre-award costs are one time only costs. See Table A.12.6 below.

Total Post-award costs is \$34,404.73 for routine reporting and recordkeeping burden hours are 899 burden hours (600 post award reporting for SLT and 200 for Business burden hours. The post award recordkeeping burden is 99 burden hours (75.60 post award recordkeeping burden hours for SLT and 23.40 for Business) hours. See chart for complete breakdown. This estimate *does* include SF forms. Post award costs are annual costs for the duration of the project. See Table below.

A.12.5 (Pre & Post-Award) Estimates of Annualized Cost to Respondents for Application

Affected Public	Type of Respondent	Number of Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (hours)	Estimated Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
State, Local & Tribal Agencies	Pre-award School or School District (140); Indian Tribal Organization (5); State or local agency (50)	195	1	195	60	11,700	\$38.27	\$447,759
	Reporting SF 425+ 1 Final Financial ReportPost-awardee)	60	5	300	1	300	\$38.27	\$11,481
	Reporting Quarterly Progress Report + 1 Final Progress Report (post-awardee	60	5	300	1	300	\$38.27	\$11,481
	Recordkeeping (Post-awardee)	60	14	840	.09	75.6	\$38.27	\$2,893.12
Sub-Total State Agency		195	8.3846153	1,635	7.5581651	12,357.60**	-	\$473,614.12

Business-for-not-for profit	(Pre-award) Producer Group & Non-profit org(5); Producer Group (5); Non-profit organization (150)	160	1	160	60	9,600	\$38.27	\$367,392.00
	SF 425 Financial Reporting + 1 Final Financial Reporting (Post-awardee)	20	5	100	1	100	\$38.27	\$7,654
	Reporting Quarterly Progress Report + 1 Final Progress Report (post-awardee)	20	5	100	1	100	\$38.27	\$7,654
	Recordkeeping (Post-awardee)	20	13	260	.09	23.4	\$38.27	\$895.52
Sub-Total Business		160	3.875	620	15.844193	9,823.40	-	\$383,388.86
Grand Total Burden		355	6.3521126	2,255	9.8443458	22,199.00**	---	\$856,176.44

****Includes post-award reporting and recordkeeping for cost purposes only.**

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life, and (b) a total operation and maintenance and purchase of services component.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The total annualized cost of this data collection to the Federal government is
\$324,859.90. Costs were estimated for two categories:

- (1) The annualized costs for awarding and managing this grant program are expected to total about \$36,315.90 based on the assumption that we will award 80 grants.

Annually, FNS grants management and program staff will spend approximately one hour reviewing each Quarterly Progress Report, Financial Report (SF-425) financial and Baseline Survey or Final Progress Report (800 reports) for a total of 800 hours.

(Please note that these estimates are annualized, therefore ten reports are submitted per year which includes four Quarterly Progress Reports, five Financial Reports (SF-425) and a Baseline Survey OR a Final Progress Report.) Post-award recordkeeping burden hours The estimate assumes an hourly cost per staff person of \$40.64 per hour (the average salary for GS-13 grade level). Wage rates were determined based on the Office of Personnel Management salary table for FY 2017 for a GS 13, Step 5 employee.

(2) FNS staffing costs, which are identified below:

The estimated cost to process and review applications is \$288,544. This is based on an estimate of a total of 20 hours of labor to process and review *each* application package. The estimate assumes an hourly cost per staff person of \$40.64 per hour (the average salary for GS-13 grade level, Step 5 employee). This labor estimate includes 2 hours by grants management and program staff to process an application, 15 hours total by 3 employees (including both Federal and non-Federal employees) to conduct a thorough technical review of each application, and 3 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award.

Assuming 355 applications will be received, it is anticipated that 7,100 hours (355 applications x 20 hours per application) will be needed to process and review these applications. Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2017 for a GS 13, Step 5 employee.

Total Annualized Pre-Award Cost to the Government	\$288,544 (7,100 application processing hours x \$40.64 hourly rate)
Total Annualized Post Award Cost to the Government	\$36,315.90 ([800 reports x 1 hour to review] + 93.6 recordkeeping hours x \$40.64 hourly rate)
Total Annualized Cost to the Federal Government	\$324,859.90

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This request will increase the current burden inventory by 627 burden hours and decreases responses by 435 annually. Prior to the FY 18 Farm to School Request For Applications update, burden inventory was 21,927 (for FY 18 it is 21,300) and 1,190 total annual responses (for FY 18 it is 755). Per the request of the Grants Management Operations Branch, Quarterly Progress Reports (instead of semi-annual reports) will be collected for Training Grants. This will allow staff to better monitor the progress of training grantees. Beyond the change in progress reporting frequency among training grantees, there have been no other modifications to reporting requirements. The increase in burden hours and decrease in total annual responses is because this submission was calculated based on an annual estimation (12 months). The previous estimate determined burden hours for Implementation and Support Service grants using an 18 month period since the grant term could vary between 12 to 24 months. The updates to the Farm to School Grant Program Application Coversheet do not request any additional information from applicants. Updates to the Farm to School Grant Program Application Coversheet include:

- Removal of the Support Service Track checkbox under the “Grant Application Type” (as that track will no longer exist in the FY 18 RFA);
- Modifications to the grant amounts under the “Grant Application Type” section
- Updates to the non-profit box under “Type of Eligible Entity” which will populate messaging asking asking charter schools to select the “school or school district” checkbox instead; and

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Baseline and final report data may be aggregated, anonymized, and published in a future USDA issued report that seeks to evaluate the success of the Farm to School Grant Program. No formal plans have been established for this publication. Additionally, data collected from progress reports may be used to develop USDA resources that highlight farm to school best practices. Highlighting of specific grantees will not be done without the grantees' express consent.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that this display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act".

There are no exceptions to the certification statement.