



November 9, 2017

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SUBJECT: Justification for No Material/Non-Substantive Change to OMB Control
No: 0584-0512

The Uniform Grant Application for Non-Entitlement Discretionary Grants, OMB Number 0584-0512 allows the Food and Nutrition Service to add programs to the list of approved programs which use this generic clearance process periodically, provided the approval is obtained in advance.

The Food and Nutrition Service (FNS) is requesting a non-substantive change to OMB Number 0584-0512 to add data collection instruments to two programs which are already approved under this generic clearance: the Team Nutrition Training and Farm to School Grants. FNS would like to add the updated Request for Agreement (RFA) for the Team Nutrition Training Grants, paper versions of the Quarterly and Annual Performance Measures Reports, and newly developed Excel spreadsheet versions of the same forms to the Team Nutrition Training Grant program materials. For the Farm to School Grant program, FNS would like to add the Application Cover Sheet. FNS is confident all of these materials are covered under the currently approved burden estimates for these grant programs; therefore, we are not requesting a burden adjustment at this time.

This updated version of the RFA for the Team Nutrition Training Grants is a more robust version of the earlier version which was submitted as part of the 2016 renewal of OMB Number 0584-0512 (ICR Reference No. 201601-0584-007). This current version goes into more detail concerning the information and materials necessary for the grant submissions. The updated version also includes additional attachments which were not part of the 2016 submission: Attachment D Letter of Agreement, Attachment E Quarterly Progress Report Form, Attachment F Performance Measures Annual Report, and Attachment G Grant Program Accounting System and Financial Capability Questionnaire. All of this information is typically required for grant submissions, so while these attachments were not specifically included in the approved version, the burden hour estimates proposed in the 2016 renewal included the burden to respondents imposed by these requirements.

In the same vein, the OMB Disclosure Statement (PRA burden statement) for the revised RFA now captures the complete burden which is incurred by both the grant applicants and the grant awardees. In the prior RFA, the OMB Disclosure Statement included a 40 hour estimate for responding to the RFA. This 40 hour burden estimate covers the time it takes applicants to complete their response to the RFA. This time estimate was included in the 2016 information collection request (ICR). In the ICR, FNS also accounted for the burden imposed on grant

awardees to prepare and submit the necessary reports; however, this burden was not included in the OMB Disclosure Statement. In the ICR, FNS estimated it takes 20 hours to complete the post award activities associated with the RFA, for a total burden hour estimate of 60 hours. In order to capture the complete burden imposed by the pre- and post-award activities for this RFA, FNS updated the burden estimate in the OMB Disclosure Statement for the revised RFA from 40 to 60 hours.

While the prior RFA discussed the requirements for the monthly and annual reporting grant awardees must fulfill under the terms of the grant, and the 2016 renewal ICR contained the time estimates for these reports, the RFA itself did not contain any paper forms, templates, or other examples for the grantees to use for their reporting. With the revised RFA, FNS included paper versions of these reports as part of the RFA attachments. To further aid grantees in tracking their reporting activities and to ensure all of the necessary information is included in the quarterly and annual reports, FNS developed Excel spreadsheet versions of the Team Nutrition Training Grant Performance Measures Annual Report and the Team Nutrition Training Grant Quarterly Report the grantees can submit electronically to FNS through Partner Web. The Excel spreadsheets will replace the paper versions of the forms and the paper versions will no longer be used. These Excel spreadsheets are included as part of this submission.

FNS is also taking this opportunity to add the Farm to School Grant Program (FSGP) Application Cover Sheet back into OMB Number 0584-0512. The cover sheet is a requirement for applications submitted under the Farm to School Program. In the past, the cover sheet was part of the approved Farm to School submission (ICR Reference No. 201209-0584-003). However, the actual application cover sheet was unintentionally omitted from the 2016 renewal, although the requirement was covered under the proposed burden estimates (ICR Reference No. 201601-0584-007). As such, since the application cover sheet was discussed, FNS does not believe adding the cover sheet as an attachment to the collection at this time will impact the currently approved burden estimates.

In summary, as part of this non-substantive request, FNS would like to add the updated version of the RFA for the Team Nutrition Training Grants, the paper versions of the Quarterly and Annual Performance Measures Reports, and the newly developed Excel spreadsheet versions of these forms into OMB Number 0584-0512 for the Team Nutrition Training Grant. In addition, FNS is also adding the Application Cover Sheet for the Farm to School Grant Program, unintentionally omitted from the 2016 renewal submission into OMB Number 0584-0512 for the Farm to School Grants. FNS does not believe the addition of any of these items impacts the currently approved burden for OMB Number 0584-0512.

If you have any questions or require any additional information, please give me a call at (703) 305-2337.