Supporting Statement for

Uniform Grant Application for Non-Entitlement Discretionary Grants

(OMB Control Number 0584-0512)

Grants and Fiscal Policy Division

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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 information collection is an extension without change of a currently approved package for all non-entitlement discretionary grant programs to collect information from grant applicants. The Food and Nutrition Service (FNS) has a number of non-entitlement discretionary grant programs. The term "grant" in this submission refers only to nonentitlement discretionary grants or cooperative agreements. Discretionary grant announcements include a number of information collections, including a "project description" (program narrative), budget information, disclosure of lobbying activities certification, and disclosure of Corporate Felony Convictions and Corporate Federal Tax Delinquencies. The budgetary information (SF-424 series), the lobbying certification (SF-LLL), and disclosure of Corporate Felony Convictions and Corporate Federal Tax Delinquencies (AD-3030) forms are pre-approved by the Office of Management and Budget (OMB) and therefore, do not require a separate approval. The SF-424 form family is approved by OMB (OMB Control Number 4040-0004, Expiration Date: December 31, 2019); however, reporting and recordkeeping burden hours associated with this form must be accounted for in each agency's information request packages.

This information is needed to evaluate and rank applicants and protect the integrity of the grantee selection process. All FNS discretionary grant programs would be eligible, but not required, to use this uniform grant application package. If FNS decides to use the uniform grant application package, FNS will note in the grant solicitation that applicants must use the uniform grant application package and that the information collection has already been

approved by OMB. If FNS decides not to use the uniform grant application package or determines that it needs grant applicants to provide additional information not contained in the uniform package, then FNS will publish a notice soliciting comments on its application to collect different or additional information before making the grant solicitation.

The uniform grant application package will include: General information and instructions; requirements for the program narrative statement describing how the grant goals, objectives, and outcomes will be reached as well as a description of the budget; Department of Agriculture form AD-3030 for the Corporate Felony Convictions and Corporate Federal Tax Delinquencies; the Standard Forms SF-424 series, and SF-LLL, that request basic information, budget information, and disclosure of lobbying activities certification, respectively. Grantees will also be required to submit Standard Form SF-425. The proposed information collection covered in this request is related to the requirements for the program narrative statement which is described in 2 CFR Part 200, Appendix I (as supplemented by USDA 2 CFR Part 400) and will apply to all types of grantees: States and local governments, Indian Tribal Organizations (ITOs), Business for- and not-for- profit organizations, and Institutions of Higher Education.

To evaluate and assess the potential risk posed by potential awardees, FNS developed a Grant Program Accounting System and Financial Capability Questionnaire in accordance with section 302 of 2 CFR Part 200. FNS also developed a Periodic Progress Report (FNS 908) to allow the Agency to review and analyze project goals, objectives, and outcomes of FNS discretionary grants. FNS seeks approval of these newly-developed forms as well as

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other forms previously approved under the Farm to School supplementary information collection (see response in question 2).

The authorities for these grants vary. The legal or administrative authorities for the potential programs requesting use of this uniform grant application package are listed below:

DISCRETIONARY GRANTS/COOPERATIVE AGREEMENTS (Request For Applications RFA's)	PROGRAM AUTHORIZATION
A1 Child Nutrition – Farm to School Grants	Richard B. Russell National School Lunch Act as amended, Section 18(g)(3), by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)
A2 Child Nutrition – Team Nutrition Training Grants	Richard B. Russell National School Lunch Act, as amended by Public Law 111-296.
A3 Child Nutrition – Technology Innovation Grants	The 2016 Consolidated Appropriations Act, Public Law 114-113 December 18, 2015
A4 Child Nutrition Programs Direct Certification Improvement Grants	Section 104 of the Child nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended Section 9(beer) of the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1758)
A5 Child Nutrition – Administrative Review & Training Grants	Richard B. Russell National School Lunch Act, as amended, Section 22
A6 Food Distribution Program – Nutrition Education Grants	Food and Nutrition Act of 2008 as amended, Section 17 (a)(1)
A7 Child Nutrition – Summer Electronic Benefit for Children (Summer EBT for Children) Grants	2010 Agriculture Appropriations Act (P.L. 111-80)
A8 Supplemental Nutrition Assistance Program – Process and Technology Improvement	Food and Nutrition Act of 2008 as amended, Section 11 (t)(1)
A9 Supplement Nutrition Assistance Program Recipient Integrity Information Technology Grants	Section 29 of the Food and Nutrition Act of 2008, as amended, (the Act) (7 U.S.C. 2036b)
A10 Special Supplemental Nutrition Program for Women, Infants and Children – Special Projects and Concept Paper	Child Nutrition Act of 1996 as amended, Section 17(h)(10)(B)(i)(III)
A11Supplemental Nutrition Assistance Program – Data and Technical Assistance (E&T) Grants	The Agriculture Act of 2014, Section 4022(a)(2)
A12 Supplemental Nutrition Assistance Program Fraud Framework Implementation Grant Program	Section 29(a) of the Food and Nutrition Act of 2008 (7 U.S.C. 2036)

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 will be contained in the Request for Application (RFA) package, each RFA package contains burden hours to include the time to complete and submit the AD and SF forms associated with it the burden denoted in footnotes. This process will occur only once each fiscal year for each grant program.

The following grants.gov forms are required of grant applicants. They are located at http://www.grants.gov/web/grants/forms.html Click Active Forms.

Non-Construction Grant Projects Forms: SF-424 Family:

- Application and Instruction for Federal Assistance (SF-424), OMB Control Number 4040-0004, Expiration Date: December 31, 2019
- Budget Information and Instruction (SF-424A), OMB Control Number 4040-0006, Expiration Date: February 28, 2022
- Assurance-Non-Construction Programs (SF-424B), OMB Control Number 4040-0007, Expiration Date: February 28, 2022

The following required OMB form, SF LLL (Disclosure of Lobbying Activities), OMB Control Number 4040-0013, Expiration Date: February 28, 2022, can be obtained at:

http://www.grants.gov/web/grants/forms.html Click Active Forms.

The form is used to indicate whether the applying organization intends to conduct lobbying activities. If the organization does not intend to lobby, they can respond "**Not Applicable**."

Also, Standard Forms (SF), applicants awarded a grant will be required to submit on a quarterly basis, the following form: SF-425, Federal Financial Report, (OMB Control Number 0348-0002; Expiration Date: September 30, 2019).

http://www.whitehouse.gov/omb/grants_forms/

In addition, in compliance with_Sections 744 and 745 of the Consolidated Further Continuing Appropriations Act, 2015 (Public Law 113-235) Corporate Felony Convictions and Corporate Federal Tax Delinquencies, all for-profit applicant and non-profit applicants are required to fill-out and submit an Assurance Statement (AD-3030) with their completed RFA package (OMB Control Number 0505-0025; Expiration Date: April 30, 2019). Furthermore, certifying information concerning applicant suitability in compliance with Federal Suspension and Debarment and Drug-Free Work Place regulations, as defined by 2 C.F.R. Parts 180, 417 and Pub.L.100-690, Title V, Subtitle D: 41 U.S.C. § 8101 *et seq.*, 2 C.F.R. Parts 182, 421. Some of our supplemental RFA may be required the use of the following AD forms approved under OMB Control Number 0505-0027; Expiration Date: December 31, 2018 and is currently at OMB under review. We are not accounting for any burden times in this collection for these forms; however, we do want to acknowledge the potential use for some of our grantees. The burden for each of the five forms will be accounted for within the individual USDA agency and staff office collection packages using the forms. The time required to complete this information collection is estimated to average 0.25 minutes per response, per form including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

- AD 1047 Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions
- AD-1048 Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions
- AD-1049 Certification Regarding Drug-Free Workplace Requirements (Grants)
 Alternative I For Grantees Other Than Individuals
- AD-1052 Certification Regarding Drug-Free Workplace, State and State Agencies

Lastly, The Food and Nutrition Service (FNS) is requesting OMB approval to add the primary grant information collection: Farm to School Grant Program Request for Applications & The Farm to School Grant Program Application Cover Sheet to the list of approved grants. FNS intends to award grants to schools, school districts, non-profits, Indian Tribal Organizations, agricultural producers and State and local agencies to develop, implement, and evaluate robust farm to school projects in accordance with the mandate set forth Section 18 of the Healthy Hunger-Free Kids Act of 2010. The time it takes for these forms are included in the overall estimates for the RFA.

- 1. Farm to School Application Cover Sheet
- 2. Grant Program Accounting System & Financial Capability Questionnaire
- 3. USDA Farm to School Program Grantee Baseline Report (Planning & Implementation)
- 4. USDA Farm to School Program Grantee Final Report (Planning & Implementation)
- 5. USDA Farm to School Program Grantee Final Report (Training)

- 6. USDA Farm to School Grant Program Quarterly Progress Report
- 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 the 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 <u>www.grants.gov</u> website. All pre-award applicants will apply for this opportunity directly through <u>www.grants.gov</u>. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will report financial data using the SF-425 electronically through FNS' Food Programs Reporting System (FPRS) at <u>https://fprs.fns.usda.gov/Home/Reminder.aspx</u> approved under OMB Control No. 0584-0594, Expiration Date: September 30, 2019. Also, grant awardees will submit the Progress Reporting Form FNS 908 to FNS via email.

4. 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.

Applications are unique and program specific. There is no similar data collection effort available.

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 requested is the minimum amount required to meet program requirements. It cannot be reduced for small businesses or entities. Although some grantees may be considered a small business or entity; they deliver the same program benefits and perform the same function as any other grantees. Thus, they maintain the same kinds of information on file. FNS estimates that 25 percent of our respondents, including for-profit and -non-profit organizations are small businesses or entities.

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.

This is a voluntary, ongoing data collection. If the information is not collected, the programs will not have adequate data to select appropriate grantees, evaluate which grants should be continued, or monitor financial reporting requirements. FNS will seek minimal information that will be critical in selecting the most promising grantees. Reduced frequency is not possible as the annual frequency of applications coincides with the annual appropriation of funds.

- 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 that require the collection to be conducted in the manner stated above.

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 notice was placed in the Federal Register on October 3, 2018, Volume 83 pages 49906-

49907, soliciting comments on FNS's intent to request OMB approval for a uniform grant

application package for FNS discretionary grant programs. At that point in time, FNS

received no public comment in response to the published Federal Register notice.

FNS staff often discuss the availability of the various grant opportunities and the grant

application requirements with potential applicants at various national or regional meetings.

For example, FNS staff discussed the application process at several webinars throughout FY

2017 and 2018. Additionally, on March 21, 2019 the Grants Management Division distributed

the 60dayFRN notice with the FNS 529, 906 and 908 forms to three of our contacts (1) Ben

Woods, Agricultural Manager Giles Public School, at bwoods@gilesk12.net; (2) Janice Wiles, Director at Communityfare.org; (3) Dr. Elizabeth Glenn, Grants Coordinator Leon County Schools at glenne@leonschools.net with our partner organizations within our distribution list requesting comment. We received a comment from Janice Wiles who requested FNS additional clarifying information or instructional pages about how to adequately fill out the FNS 529 form. FNS responded to Ms. Wile to explain the FNS 529 form is filled out by the Grants Management staff on behalf of the grantee. Ms. Wiles also indicated she could not download the FNS 908 to view and be able to provide any necessary feedback. On May 29, 2019, FNS forwarded another PDF and MS Word version of the FNS 908 directly to Ms. Wiles. At this time, there are no additional comments. The comments received and FNS responses are included in this ICR package.

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

There are no plans to provide payment 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.

FNS is requesting the information called for in this application package pursuant to its statutory authority to award grants. Provision of the information requested is entirely voluntary. The collection of this information is for the purpose of aiding in the review of applicants prior to grant award decisions and for management of grants. The only personally identifiable information is requested from potential applicants is included on SF-424. This information may be used within FNS but will not be disclosed outside of FNS as permitted by the Privacy Act, including disclosures to the public as required by the Freedom of Information Act. Grantees will be required to submit semi-annual or quarterly SF-425s, financial status reports. These reports will be stored in a secured database. Therefore, grantees must obtain authorization to submit the form into FPRS. The applications for authorization contain personally identifying information on individuals doing business with 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 the uniform grant application package for

discretionary grant programs.

- 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.

The table below provides estimates of average annual and multi-year number of discretionary grant/cooperative agreement applications expected in FY 2019 thru 2021, the estimated time required to complete the application (program narrative statements) and the estimated total burden hours for each type of annual discretionary grant/cooperative agreement. These estimates reflect numbers of discretionary grant/cooperative agreement applications received in the past and the average length of time it takes to complete the applications submitted. Since generic clearances must request all three years of burden upfront, FNS plans is to depict annual estimates and multiple by three-years the lifecycle of the approval; therefore, FNS is requesting **30,000** total response and **150,000** burden hours for the next three years. FNS is also including our ongoing request for application (RFA) with the primary collection request. Some of which will be awarded more than once a year. These ongoing grants estimates will make up **35,569** for pre- and post award burden hours and **6,707** responses (of the overall burden hours approximately **47.45** hours are *Post-award* recordkeeping burden hours for maintaining forms submitting during the RFA and post-award. This leaves a remaining balance total burden hours **114,430.55 round up to 114,431.00** annual responses for 3 years.

Additionally out of the 829 grant applications, 604 are ongoing and 225 will be designated by Congress as miscellaneous grant for the RFA which are not included with this ICR. Other RFAs will be submitted as a supplemental ICR once the agency is have those ready for OMB's review.

Pre-Award Burden Estimates: Pre-Award burden hours are based on how many initial applications FNS receives in response to Request for Applications (RFAs.) The estimated ongoing grants, **604** Grantees will only submit one (1) proposal per RFA. FNS estimates it will take between 23 to 60 hours (average **50.0222436**) to complete and submit a proposal depending on the specific discretionary grant/cooperative agreement program (including any pre-award

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forms). We estimate this is an average of 40.77 for States Agency to draft and submit a proposal and 43.28 for Business. For the purpose of the annual and the 3-year OMB approval estimated burden for pre-award burden hours are hours based on an estimated **2,487** application submissions (829 x 3) taking 44.583944 hours to complete depending on the specific discretionary grant/cooperative program.

A detailed burden table is included as Appendix B – 0584-0512 Burden Table. The total burden requested under this ICR is as follows:

(a) General Information and Instructions and program narrative requirements – The

above list of grants (see question 1) are submitted for continued clearance under this

generic. RFAs for these grants, which includes the general information and

instructions, etc., are included in the Appendix A (and submitted under this request as

ICs). For other grants submitted under this generic clearance, the RFA will be

submitted with the clearance request, but will be similar to those included in the

appendix.

- **(b) USDA Disclosure Forms** These forms sited and describe in #2 are approved by OMB but burden is accounted for within this collection per the terms of clearance included in this package for the USDA forms. Additionally, in the terms of clearance (submitted with this collection) FNS will fill out FNS 529 form and have the grantee sign, there is no burden associated with this form.
 - 1. AD-3030¹
 - 2. AD-1047
 - 3. AD-1048
 - 4. AD-1049
 - 5. AD-1052

(c)Grants.gov Forms – The following grants.gov forms are required of grant applicants. Non-Construction Grant Projects Forms: SF-424 Family (also cited and described in #2): 1. SF-424²

¹AD-3030 form, Business will use 45 burden hours and 204 total annual responses)

² SF Family Series, Business will use 2,228 burden hours 2,045 total annual responses and State, Local & Tribal Government will use 4,366 burden hours and 4,067 total annual responses

- 2. SF-424A
- 3. SF-424B
- 4. SF LLL

Post-Award Burden Estimates:

Post-award burden hours are based on the production of semi-annual or quarterly financial reports using the SF-425 and progress reports and one final report that are submitted to FNS by the grantee selected for the project. Based on an annual average period of performance, each grantee will submit either 2 semi-annual or 4 quarterly progress and 4 financial reports and 1 final progress report as well as 1 financial report.

- 5. *Progress and Final reports:* The progress and final reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. Based on an annual average period of performance, each grantee using the Progress Reporting Form FNS 908 will submit either 2 semi-annual or 4 quarterly progress reports (averaged to 3 annual progress and financial reports in the burden table).
- 6. *Quarterly and Final Financial Reports:* The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant or cooperative agreement.

In an effort to ensure a consistent data reporting format across all program areas, FNS seeks approval of a recently created standardized Progress Reporting Form (FNS-908). The goal is to develop a progress report that moves away from the general narrative structure currently in use by FNS and to focus on measuring and capturing both quantitative and qualitative data as it relates to objectives and goals identified by the individual program solicitations.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant or cooperative agreement.

FNS estimates approximately **278** applicants of 829 applications reviewed annually (604 ongoing + 225 Congress designated) during the pre-award process will be selected for an ongoing grant and required to report and retain records during the post award period.

In addition, out of the 278 applications (post award grantees) **175** are designated as miscellaneous awards by Congress. Out of the 175 accounted for in the pre-award stages, approximately **75** applications are set aside miscellaneous grants that Congress will award later. Those burden hours

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are not accounted for in this request. FNS will submit those once Congress has designated as

miscellaneous.

A.12-1 Summary of Post and Pre-Award Estimates of Burden Hours for reporting and recordkeeping with Three-year ear Estimates Affected Public: State, Local and Tribal Government, Universities, and Business-for and Not-for Profit

3 Year Total Requested:	30,000.00	150,000.00
Total Used in ROCIS:	6,707.00	35,569.00
Total Remaining:	23,293.00	114, 430.55

Assuming an applicant staff person with a salary from \$22.66 to \$53.17 is needed to complete the applications, the total annualized dollars spent on respondent burden is \$2,683,170.60 (x 0.33 total = \$885,446.29) cost with **fully loaded wages is \$3,568,616.90**) as depicted in Table B.12-1 Estimates of Annualized Cost to Respondents. Wage rates were determined using

http://www.bls.gov/bls/wages.htm website, Occupational Employment and Wages, May 2017.

B.12-1 Estimates of Annualized Cost to Respondents

		Pre-Award Reporting			Post	-Award Repo	orting	Post Aw			
Type of Applicant	Hourly Wage Rate	Number of Applicant s by Type	Estim. Burden Hours	Pre-Award Reporting Respondent Cost	Number of Applicant s by Type	Estim. Burden Hours	Post- Award Reporting Responden t Cost	Number of Applicant s by Type	Estim. Burde n Hours	Post- Award Reporting Respondent Cost	BLS Category
State & Local Government	\$47.72	225	13,500	\$644,220	190	4,693	\$223,949.96	190	.1169	\$1,059.91	11-9032 Education Administrators, Elementary and Secondary School - Average of State and Local Government
School & School Districts	\$46.94	185	11,100	\$521,034	115	2,840.50	\$133,333.07	110	.1169	\$603.60	11-9032 Education Administrators, Elementary and Secondary School - Elementary and Secondary Schools
Universities	\$44.41	10	600	\$26,646	7	172.90	7,678.49	7	.1169	\$36.34	11-9033 Education Administrators, Postsecondary— Junior College
Indian Tribal Governments	\$46.85	30	1800	\$84,330	20	494	\$23,143.90	20	.1169	\$109.54	11-9032 Education Administrators, Elementary and Secondary

											School - Local Government
Non-profit Organization s	\$21.08	350	21,0000	\$442,680	260	6,284	\$132,466.72	260	.1169	\$640.71	21-0000 Community and Social Service Occupations
Producer Groups	\$21.08	150	9,000	\$189,720	70	1,750	\$36,890.00	70	.1169	\$172.50	21-0000 Community and Social Service Occupations

			Pre-Award Reporting			Post-Award Reporting			Post Award Recordkeeping			
	Type of Applicant	Hourly Wage Rate	Number of Applicant s by Type	Estim. Burden Hours	Pre-Award Reporting Respondent Cost	Number of Applicant s by Type	Estim. Burden Hours	Post- Award Reporting Responden t Cost	Number of Applicant s by Type	Estim. Burde n Hours	Post- Award Reporting Responden t Cost	BLS Category
	Total		829	57,000	\$1,908,630	644	16,234	\$557,462.14	332	.1169	\$2,622.60	

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 costs, operating costs, or maintenance to report.

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 estimated Federal cost for this information collection is with fully loaded wages is **\$1,332,888.94** (\$1,000,540 + \$1,632.14 x 0.33 to account for fully loaded wages). It is estimated that within FNS there is an average of about 20 hours of labor required to process an application package for this data collection. This labor estimate includes time spent by grants management operations and program staff to process an application (2 hours) and time spent by Agency staff to conduct a thorough technical review of each application (3 staff x 6 hours). Assuming 950 applications will be received on average, during FY 2019-2021, it is anticipated that 19,000 hours will be needed to process and review these applications. Assuming that the Agency staff participating in the processing and review of these applications makes approximately \$52.66 per hour, the estimated annual cost to the Federal Government is \$1,000,540 (19,000 hours X \$52.66). The cost for the 3-year processing and reviewing these applications is \$2,811,240. (In addition, the grants themselves are expected to total about \$75-\$100 million depending on how many grants are funded on a competitive basis and the merits of the applications received. Wage rates were determined based on the Office of Personnel Management salary table for FY 2018, GS 13, Step 5.

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Additionally, this information collection also assumes that a total of 20 hours of Federal employee time to draft this information collection: for a GS-14, step 5 Branch Chief at \$62.23 per hour for a total of \$1,244.60 and the Division Director (GS-15 Step 1 at \$64.59 per hour) reviewed the information collection for consistency which took a total of 6 hours at a cost of \$387.54 for a total of \$1,632.14 on an annual basis for drafting and reviewing this collection request. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2018.)

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

This is an extension without change to the currently approved information collection. The current OMB inventory for this collection is **150,000 burden hours and 30,000 annual responses over a three-year period.** With this approval of the primary package, FNS will use **35,569 reporting burden hours** during pre-award and post-award reporting and **47.45 recordkeeping burden hours** and **6,707 total annual responses** for pre-award and post award total annual responses for reporting and recordkeeping.

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

Information in the grant applications will not be published. Disclosure of information contained in the grant application package is subject to the Freedom of Information Act and The Privacy Act. FNS will publicize summary information of the applicants that receive funding at the FNS website, <u>www.fns.usda.gov/privacy-policy</u>.

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.

FNS plans to display the OMB Control number and the expiration date 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 will be no exception to the certification statement.