SUPPORTING STATEMENT
for the

FOREIGN MARKET DEVELOPMENT COOPERATOR PROGRAM
and
MARKET ACCESS PROGRAM
(0551-0026)

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 authority for the Foreign Market Development Cooperator Program (FMD) and the Market Access Program (MAP) is contained in Title VII and section 203 of the Agricultural Trade Act of 1978, 7 U.S.C. 5623, as amended, which took effect October 21, 1978. The programs were reauthorized by the Agriculture Improvement Act of 2018 (section 3201), which became effective December 20, 2018. The primary objective of the FMD and MAP programs is to encourage and aid in the creation, maintenance and expansion of commercial export markets for United States agricultural commodities and products through cost-share assistance to eligible trade organizations. Financial assistance for both programs is made available on a competitive basis. The programs are administered by personnel of the Foreign Agricultural Service (FAS).

Prior to initiating program activities, each Cooperator or MAP Participant must submit a detailed application to FAS. They are also required to maintain records on all information submitted to FAS. The information collected will be used primarily by FAS to manage, plan, evaluate, and account for government resources. Specifically, data is used to assess the extent to which: applicant organizations represent U.S. commodity interests; benefits derived from market development efforts will translate back to the broadest possible range of beneficiaries; the market development efforts will lead to increases in consumption and imports of U.S. agricultural commodities in the target market; the applicant is able and willing to commit personnel and financial resources to assure adequate development, supervision, and execution of project activities; and private organizations are able and willing to support the promotional program with aggressive marketing of the commodity in question.

The integrity of both programs hinges on information received from or maintained by the industry. Information collected provides evidence that taxpayer funds are being disbursed in accordance with authorizing legislation, ethical standards, and standard Government rules and regulations.

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

All data collected is used by FAS marketing specialists and program managers for the allocation of funds, program management, planning, and evaluation. The data collection has, in almost every case, been mandated by either a GAO or OIG report to eliminate perceived deficiencies in program management and to establish additional program controls.

Allocation Criteria: The criteria for the allocation of funds are enumerated in the program regulations as well as the annual announcements of the Cooperator Program and the Market Access Program, which are published in the Federal Register. FAS considers a number of factors when reviewing proposed projects. These factors include the ability of the organization to provide an experienced U.S.-based staff with technical and international trade expertise to ensure adequate development, supervision, and execution of the proposed project; the applicant's willingness to contribute resources, including cash and goods and services of the U.S. industry and foreign third parties; the conditions or constraints affecting the level of U.S. exports and market share for the agricultural commodities and products to be promoted; the degree to which the proposed project is likely to contribute to the creation, expansion, or maintenance of foreign markets; the degree to which the strategic plan is coordinated with other private or U.S. government-funded market development projects; the applicant's past export and demand expansion performance; and the accuracy of the applicant's past export projections.

Applications: Through the application, prospective Cooperators or Participants submit data about their organizations so that FAS can apply the allocation criteria discussed above. The application is also the primary strategic planning document. The application assesses market potential, outlines Cooperator or Participant strategy and goals, explains and justifies individual activities, provides estimated budgets, and includes benchmarks and goals for evaluating performance. Prior years' applications also dictate current application content because many activities continue or follow-up on previous activities. The scope and content of each application depends largely on the applicant's organizational style, marketing approach, and method of operation.

Project Agreements: The project agreement is a binding instrument and creates a legal obligation on the part of CCC to make appropriated funds available to the Cooperator or Participant. The agreement creates a cooperative relationship between CCC and the Cooperator or Participant outlining the basic responsibilities of each party and the contributed resources to support achievement of mutual goals.

Evaluation: FAS requires applicants to submit evaluation plans and performance measures in order to (1) monitor performance of market development activities and programs, (2) evaluate the benefits and effects of these activities, and (3) document the experience gained from these activities for use in the design and implementation of future market development programs. Based on this information, FAS program managers are also better able to determine what changes are needed to improve program performance and design future programs.

Contribution Reports: FAS requires Cooperators and Participants to provide part of the resources needed to conduct promotion programs. Experience has shown that as the Cooperators or Participant increase their financial commitment, the organization enhances program management and supervision. Cooperators and Participants commit to a contribution level in their applications. This is one criterion that is used in the allocation of program resources. The Cooperators and Participants are, therefore, held to the contribution levels they specify in their applications. Contribution reports are required to ensure program participants have met their financial and in-kind obligations.

Reimbursement Claims: The annual application, approved by FAS, and corresponding amendments provide the authorities and limitations for Cooperators and Participants to make expenditures under project agreements. The Cooperator or Participant is responsible for instituting a financial management and accounting system that ensures accurate, current, and complete disclosure of all financial transactions for each approved activity. All expenditures incurred must be proper, reasonable, and in accordance with CCC regulations. The Cooperator or Participant is responsible for submitting claims to FAS requesting reimbursement for incurred costs as outlined in the application. Reimbursement claims are generally submitted on a monthly basis.

Office Management Records: Other reporting and recordkeeping requirements, i.e., travel reports, office management records, salaries, etc., are required as a means of ensuring that U.S. Government resources are disbursed as judiciously as possible. FAS requires the same control of Cooperator or Participant spending of taxpayer funds as the U.S. Government requires of its own employees. For example, FAS asks Cooperators and Participants traveling on U.S. Government funds to follow provisions of the Federal Travel Regulations; the purchase of office equipment follows General Services purchasing practices; and salaries and allowances paid from U.S. Government funds, in most cases, follow GS salary levels or Embassy Foreign National salary scales. Again, all of these requirements are placed on Cooperators and Participants in order to maximize return on investment and preserve program accountability.

Brand Program Operational Procedures. MAP Participants with branded programs (branded programs are not available in the Cooperator program) are required to establish brand program operational procedures, and they are submitted on an annual basis to CCC for approval. Procedures must, at a minimum, include a brand program application, application procedures, application review criteria, brand participant eligibility requirements, a participation agreement, reimbursement requirements, compliance requirements, reporting and recordkeeping requirements, employment practices, financial management requirements, contracting procedures, and evaluation requirements. Participants will receive written official notification of whether or not the procedures are approved. Until written approval is received, Participants cannot enter into participation agreements with branded participants and may not implement any brand programs. These procedures are to be reviewed annually by the Participant.

Written Contracting Guidelines. Participants and cooperators are required to submit to CCC, for CCC approval, written contracting guidelines for contracts that are funded, in whole or in part, with MAP funds. These contracting guidelines govern all of a Participant's MAP-funded contracting involving contracts with an annual value of $35,000 or more. The guidelines indicate the method for evaluating proposals received for all contract competitions, the method for monitoring and evaluating performance under contracts, and the method for initiating corrective action for unsatisfactory performance under contracts. Participants will receive written official notification of whether or not the guidelines are approved, at which point guidelines remain in place until approval is retracted or new guidelines are approved that supersede them. Guidelines may be modified or resubmitted for FAS review and approval at any time.

Anti-fraud Prevention Program. All MAP Participants must annually submit to CCC for approval a detailed fraud prevention program. The fraud prevention program includes, at a minimum, an annual review of physical controls and weaknesses, a standard process for investigating and remediation of suspected fraud cases, and training in risk management and fraud detection for all current and future employees. Until the Participant has received written approval of their program from CCC, Participants cannot conduct any MAP activities or permit any MAP activities to occur. If the Participant receives an allegation of or information leading to a suspicion of misrepresentation or fraud, they must report it to a specified USDA contact and cooperate fully in and comply with any directives resulting from a USDA investigation.

Other Reports and Record Keeping Requirements: Other reports and records are required to ensure the proper and judicious use of Government resources. Each Cooperator and Participant must certify that any Federal funds received supplement, but do not supplant, private or third-party funds or other contributions to program activities. Cooperators and Participants must submit reports of findings whenever CCC resources are used for travel or research purposes. Auditable supporting documentation is required for all expenses reimbursed with CCC resources or claimed as a contribution. These include, but are not limited to: canceled checks, invoices, samples of produced materials, etc. Personnel records, including sick and annual leave, are required to document compliance with prescribed personnel policies. As a rule, such requirements conform to generally accepted Government standards.

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.

FAS developed a web-based interface known as the United Export Strategy (UES) that permits electronic submission of applications. FAS has replaced the marketing proposals, annual marketing plans, and amendments of the past with program applications which allow applicants to apply for several FAS programs in a single application. This eliminates vast amounts of duplicative information.

FAS has implemented an electronic data transfer system using the UES interface whereby reimbursement claims can be sent automatically from Cooperator and Participant computer systems to FAS, resulting in a major reduction in one of the largest paperwork requirements in the system. In developing the UES for the electronic submission of reimbursement claims and program applications, FAS has worked extensively with Cooperators and Participants to develop user-friendly systems that are compatible with other software applications used by the Cooperators and Participants.

FAS has also implemented a computer financial management and information system to streamline data collection requirements, improve program accountability, and ease administrative burden on the Cooperators and Participants.

Over the last 3 years, FAS has continued its efforts in making the information submission process electronic and identical for the FMD and MAP. Applications to both the Cooperator Program and MAP can be made in a single application. Reimbursement for activities under the Cooperator Program and MAP is also made through the same interface.

Participants can also submit their brand promotional procedures, contracting guidelines, and anti-fraud prevention plans electronically to a central mailbox, which saves significant time.

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 Item 2 above.

FAS administers various agricultural export assistance programs, including the Cooperator Program, the Market Access Program, the Emerging Markets Program, the Quality Samples Program, and the Technical Assistance for Specialty Crops Program. In an effort to facilitate the strategic planning process of applicant organizations, as well as that of the Federal government, FAS unified and simplified the application process for its agricultural export assistance programs. FAS recognized that a group interested in applying for more than one of these programs may have to submit some information multiple times. The on-line, unified application process removes duplicative information and allows Cooperators and Participants to submit a single document when applying for the five FAS market development programs.

The data required of Cooperators and Participants cannot be obtained from any other source other than the organization itself. Cooperators or Participants are commodity organizations or agricultural cooperatives (i.e., U.S. Wheat Associates, American Soybean Association, etc.) who develop marketing programs specifically for their commodities or products. Most of the data

developed and presented to FAS is developed in-house by marketing and commodity analysts on their staffs. Some of the data, such as consumer or market surveys, are acquired via independent third parties for evaluation purposes.

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

Only nonprofit U.S. agricultural trade organizations, nonprofit state regional trade groups, U.S. agricultural cooperatives, and state government agencies are eligible to participate in the programs, so the information collection burden estimated in this request is only imposed on those eligible organizations. The information collection requirements imposed by these programs do not impose any significant burdens on small businesses. However, the agency continues to review and revise its administration of the programs to better ensure accountability of program funds and program efficiencies.

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.

The data collection requirements outlined above, except for periodic billings to FAS and travel reports, have been reduced to only one submission per year. The program could not be implemented without the submission of the information outlined above.

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;**

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

*** requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

*** requiring respondents to submit more than an original and two copies of any document;**

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

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

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5. FAS does not require respondents to keep records for longer than three years.

* **in connection with a survey that is not designed to produce valid and reliable results that can be generalized to the universe of the study;**

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

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

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

* **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**

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

* **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.**

This information collection is conducted in a manner that is consistent with 5 CFR 1320, Section 5.

8. If applicable, provide a copy and identify the date and page number of publications 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 periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Notice of the request for public comments on the revision of the currently approved information collection for FMD and MAP programs was published in the Federal Register (84 FR 8841) on March 12, 2019. FAS did not receive any comments. A copy of the notice is attached.

FAS consulted by phone with the following Participants on the accuracy of the burden hours estimated in the data collection for the FMD and MAP programs. The comments from Participants and FAS' responses are noted as follows:

1) John Sandbakken, Executive Director, National Sunflower Association, 2401 46th Ave SE, Mandan, ND 58554, (701) 328-5102, indicated that the estimated burden hours is realistic and added that the FAS' instructions in completing program requirements are clear. However, he said that the application process in the UES online system can be improved. NSA staff devotes a significant amount of time in submitting their application in the UES system. The "online application system is difficult and time consuming" because they are unable to easily upload their application document to the UES. Instead they "have to cut and paste from Word documents and Excel tables to transfer" their information to the format or boxes required in the UES online system.

   Mr. Sandbakken ended the call by indicating that NSA has a good partnership with FAS and appreciates FAS' efforts in running the programs smoothly, and all that FAS does for the organization and the industry.

FAS Response: Under the Paperwork Reduction Act, FAS has put in place processes to reduce the burden on Participants and continues to explore options to further minimize this hardship. FAS continues to work with the UES IT team to make refinements and enhancements in the UES system to make it easier for Participants to comply with program requirements.

2) Lori McGehee, International Marketing Consultant, Ginseng Board of Wisconsin, 668 Maratech Avenue, Suite E, Marathon, Wisconsin, 54448, (303) 946-3142, reported that, in her situation, the estimated burden hours are low in a few areas of the data collection process. This is because Ms. McGehee, compared to her counterparts, works with four organizations, including, American Sheep Industry Association, National Sunflower Association, Ginseng Board of Wisconsin, and Mohair Council of America. Although these groups, according to her, are relatively small in terms of operations, she reported that the application process takes longer than the estimated burden hours for each group

because of the number of countries targeted, varying commodities being promoted, and the challenges of determining meaningful activities and formulating performance indicators in the targeted markets. Ms. McGehee added that this problem is further compounded because the directions and instructions in the UES are unclear and that she continues to discover technical glitches in the system, which takes time for the UES IT team to resolve. The burden hours for reporting contributions, office management, administrative procedures, and the MAP procedures are accurate.

Overall, she noted that she has good interactions with FAS, and appreciates that FAS staff are readily accessible and available to help.

FAS Response: FAS welcomes suggestions from Participants to improve the UES online system and data collection processes and continues to work with the UES IT team to fix identified issues and make the UES system more user friendly.

3) Bernadette M. Wiltz, Executive Director, Southern United States Trade Association, 7011 Poydras Street, Suite 384, New Orleans, Louisiana 70139, (504) 568-6010, indicated that the estimated burden is low in some areas of the data collection process, including application, contribution reporting, evaluations, administrative reports, and the three MAP procedures on contracting, brand operational, and fraud prevention. This, according to Ms. Wiltz, is because SUSTA manages about 125 branded companies and 300 companies on the generic side of their programs, all of which are scattered over numerous overseas markets. Because of its size, the assorted commodities/US products it promotes, and diverse market operations and numerous stakeholders, SUSTA's UES planning application starts very early in the program year, taking about 6 months to put together from start to completion. She added that FAS' instructions are clear and considers the data collection necessary in FAS's managing the FMD and MAP programs effectively. In the end, Ms. Wiltz extended an invitation for FAS to visit SUSTA to observe first-hand how they actually operate.

FAS Response: FAS will look for ways to provide assistance and guidance to all Participants through improving the UES online reporting, in addition to access to FAS staff for technical support.

4) Sarah Moran, Vice-President, USA Rice Federation, 2101 Wilson Blvd., Suite 610, Arlington Blvd, Virginia, (703) 236-1457, reported that the estimated burden hours for the data collection for FMD and MAP are accurate. She added, however, that submitting their application in the online system remains cumbersome because the current format does not allow Participants to readily upload marketing plans as one whole document.

FAS Response: The UES online system is set up to allow FAS to easily process and review Participant's marketing plans enabling FAS to make funding decisions and respond to questions or concerns from Participants and other stakeholders promptly. FAS continues to work with the UES IT team to make refinements in the UES system to make it easier for Participants to

comply with program requirements, in addition to the help mailbox posted in the UES homepage.

5) Sarah Gelpi, Assistant Director, International Marketing, Bryant Christie, 205 I Street, Suite 200, Sacramento, California 95811, (916) 492-7062, indicated that for Cranberry Marketing Committee and groups similar to CMC's level of allocations, about $1.7 M, the estimated burden hours are high compared to larger groups. FAS instructions in completing all required documentations are clear. Ms. Gelpi also reported that the UES online system is easy to navigate.

FAS Response: FAS continues to consider updates to the UES online system to make it more user friendly and reduce burden hours to all Participants.

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

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

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

Cooperators and Participants are aware that information collected relating to these programs is generally open for public inspection, but the agency may withhold information which could cause substantial competitive harm to the submitter under exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. 552(b)(4). It is also the agency's policy, prior to responding to a FOIA request, to obtain and consider the views of the submitter of the information if the information submitted is not readily identifiable as privileged or business confidential. If the agency disagrees with the views presented by the submitter, it will give the submitter sufficient time, prior to release of the information, to pursue legal action to prevent the release.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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 sensitive questions involved in this information collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

* **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

* **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 83-1.**

* **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contraction out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The current annual burden estimated at 88,922 total hours is based on separate estimates of 10 distinct areas of data collection for the FMD and MAP programs: applications, program agreements, program evaluations, travel reports, contribution reports, administrative procedures, office management, brand operational procedures, written contracting guidelines, and anti-fraud prevention guidelines. The fringe benefit cost is accounted for in the total dollar amount. The estimates used to determine the burden on the public are explained as follows:

a) Applications. Applications include many separate estimates, projections, goals, etc., all of which make up a comprehensive application. The current estimate for one Cooperator or Participant to complete an application is approximately 320 hours. As explained earlier in this document, less information is requested from Cooperators and Participants than in the past, and multiple programs are applied for with a single application.

b) Program agreements. The estimated burden hours for program agreements includes preparing new or amending already active program agreements. Participating organizations take approximately 2 hours to review the project agreement (contract), clear them with legal counsel (if necessary), sign them, and return them to FAS. On average, 268 program agreements are signed each year.

c) Evaluations. Cooperators and Participants are required, under the MAP and FMD regulations, to evaluate the effectiveness of their programs. FAS encourages Cooperators and Participants to use the GPRA as a guideline for their evaluations. Applications include evaluation plans and performance measures in order to (1)

monitor performance of market development activities and programs, (2) evaluate the benefits and effects of these activities, and (3) document the experience gained from these activities for use in the design and implementation of future market development programs. Establishing good performance measures enables Cooperators and Participants to perform meaningful evaluations. Based on these evaluations, Cooperators, Participants, and FAS program managers are better able to determine what changes are needed to improve program performance and designing future programs. It is estimated that it will take approximately 80 hours to complete annual evaluations, analyze the results, and develop a written report which summarizes the evaluation process and findings.

d) Travel Reports. Since travel is a very important part of overseas market development, the number of trips involving both 1) the United States and 2) foreign countries amounts to about 2,680 trips per year. As the U.S. Government requires trip reports from government employees, FAS also finds this type of information extremely useful as a management tool. Cooperator and Participant trip reports provide valuable insight to market situations and program issues. The average time required to prepare travel reports is 2 hours per Cooperator or Participant.

e) Contribution reports. Each Cooperator and Participant prepares a summary contribution report each year via a web-based interface. Depending on the size and scope of the program, smaller Cooperators or Participants may need only several hours to prepare the report, whereas larger Cooperators or Participants may need several weeks. The average time required to prepare the contribution report is 8 hours per Cooperator or Participant.

f) Administrative Procedures. Cooperators and Participants are responsible for submitting claims to FAS requesting reimbursement for program expenditures. Cooperators and Participants submit a claim whenever they deem their costs are of sufficient size to justify a claim for reimbursement. Cooperators and Participants are required to maintain receipts for all program related expenditures in excess of $25.00. The estimate of 40 hours per claim includes all incidental office costs and procedures necessary to prepare and support each claim.

g) Office Management. Cooperators and Participants are required to keep good office records available for audit review. These records include items such as salary computations, receipts for all disbursements, time and attendance records, etc. Only 9 Cooperators have foreign offices supported by Cooperator project funds. In addition, FAS requirements apply only to Cooperator overseas offices and only if a portion of the cost is paid with project funds or counted as a contribution. The average time required to prepare and maintain office records is estimated at 800 hours per Participant.

h) Brand Program Operational Procedures. Under the new MAP regulation which became effective in the 2013 program year, Participants with branded programs are required to establish brand program operational procedures that must be submitted on an annual basis to CCC for approval (not all Participants have branded programs; branded programs are not available in the Cooperator program). Procedures must, at a minimum, include a brand program application, application procedures, application review criteria, brand participant eligibility requirements, a participation agreement, reimbursement requirements, compliance requirements, reporting and recordkeeping requirements, employment practices, financial management requirements, contracting procedures, and evaluation requirements. The average time required to prepare the brand program operational procedures is estimated at 8 hours per Participant.

i) Written Contracting Guidelines. Under the new MAP regulation which became effective in the 2013 program year, Participants are required to submit to CCC, for CCC approval, written contracting guidelines for contracts that are completely or partially funded with MAP funds. These contracting guidelines govern all of a Participant's MAP-funded contracting involving contracts with an annual value of $35,000 or more. The guidelines indicate the method for evaluating proposals received for all contract competitions, the method for monitoring and evaluating performance under contracts, and the method for initiating corrective action for unsatisfactory performance under contracts. The average time required to prepare the contracting guidelines is estimated at 10 hours per Participant.

j) Anti-fraud Prevention Guidelines. Under the new MAP regulation which became effective in the 2013 program year, MAP Participants must annually submit to CCC for approval a detailed fraud prevention guideline. At a minimum, the guideline must include an annual review of physical controls and weaknesses, a standard process for investigating and remediation of suspected fraud cases, and training in risk management and fraud detection for all current and future employees. The average time required to prepare the fraud prevention guideline is estimated at 20 hours per Participant.

	DESCRIPTION	NO. OF RESPONDENTS	FREQUENCY	TOTAL RESPONSE	AVERAGE HOURS PER RESPONDENT	TOTAL HOURS	COST PER HOUR	COST TO PUBLIC
A)	Applications	67	1	67	320	21,440	70	1,500,800
B)	Project Agreements	67	4	268	2	536	80	42,880
C)	Evaluations	67	1	67	80	5,360	70	375,200
D)	Travel Reports	67	40	2,680	2	5,360	65	348,400
E)	Contribution Reports	67	1	67	8	536	45	24,120
F)	Administrative Procedures	67	17	1,139	40	45,560	45	2,050,200
G)	Office Management Records	10	1	10	800	8,000	40	320,000
H)	Brand Program Operational Procedures	15	1	15	8	120	70	8,400
I)	Written Contracting Guidelines	67	1	67	10	670	70	46,900
J)	Anti-fraud Prevention Program	67	1	67	20	1,340	70	93,800
	TOTAL		**68**	**4,447**		**88,922**		**4,810,170**

13. Provide an estimate 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 Items 12 and 14).

* **The cost estimate should be split into two components: (a) a capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of the methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include among other items, preparations for collection information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

* **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

* **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

(a) There is no cost burden to respondents associated with capital or start-up costs.

(b) There is no cost burden to respondents associated with operating or maintaining systems or purchasing systems.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annual costs to the Federal Government for all submissions found in the regulations are as follows:

ITEM	ORG	GRADE	RATE	HOURS	COST
A) Applications	POD	13	$47.52	90	$4,277
	COPD	13	$47.52	22,540	
$1,071,101					
B) Agreements	POD	11	$33.34	140	$4,668
C) Evaluations	POD	13	$47.52	270	$12,830
	COPD	13	$47.52	1,350	$64,152
E) Contributions	POD	11	$33.34	810	$27,005
	COPD	12	$39.96	80	$3,197
F) Administrative Procedures	POD	11	$33.34	4,510	$154,363
TOTAL					**$1,341,593**

Note: Based on the Office of Personnel Management 2019 General Schedule for the locality pay area of Washington-Baltimore -Virginia-West Virginia-Pennsylvania.

POD refers to the Program Operations Division of FAS. This office is responsible for administrative operation of the MAP and Cooperator program. COPD refers to the Cooperator Programs Division of FAS which is responsible for review of application and evaluation content and day to day contact with program participants.

These per hour rates are taken from the 2019 Federal GS pay scale, which does not include fringe benefits.

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

The increase in the burden hours reflects the increase in the number of respondents from 64 in 2015 to 67 in 2019. There is an increase in the number of responses and burden hours due to the increase in the number of respondents.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This question is not applicable for this combined information collection.

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.

This question is not applicable for this combined information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions", of OMB Form 83-1.

There are no exceptions.