

2019
SUPPORTING STATEMENT
0572-0146
Special Evaluation Assistance for Rural Communities and Households Program
(SEARCH)

A. JUSTIFICATION

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

The Food, Conservation and Energy Act of 2008, Public Law 110-234 (Farm Bill) amended Section 306(a)(2) of the Consolidated Farm and Rural Development Act (CONACT) (7 U.S.C. 1926 (a)(2)). The amendment created a grant program to called Special Evaluation Assistance for Rural Communities and Households (SEARCH) Program grants. Under this authority, the Secretary may make grants available for no more than four percent of the total allocation for water and waste disposal activities.

Under the SEARCH program, the Secretary may make predevelopment and planning grants to public bodies, organizations operated on a not-for-profit basis, or Indian tribes on Federal and State reservations and other federally recognized Indian tribes. The grant recipients may use the grant funds for feasibility studies, design assistance, and technical assistance necessary for application development. Eligible entities must be financially distressed and in rural areas with populations of 2,500 or fewer inhabitants. Monies must be used for water and waste disposal projects as authorized in Sections 306(a)(1), 306(a)(2) and 306(a)(24) of the CONACT.

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.

Organizations applying for SEARCH grants must submit an application which includes an application form, various other forms and certifications, and supplemental information. The Rural Utilities Service (RUS) will use the information collected from applicants, borrowers, and consultants to determine applicant eligibility, project feasibility, and the applicant's ability to meet the grant and regulatory requirements.

Failure to collect proper information could result in improper determinations of eligibility, improper use of funds, or hindrances in making grants authorized by the SEARCH program.

The following information/forms are collected and accounted for under this collection package:

WRITTEN (No form)

Audits Based on Federal Assistance

Borrowers must submit audited financial statements annually in accordance with 2 CFR 200 and other governing regulations. 2 CFR 200 has been recently updated by the COFAR to provide updated guidance on modified reporting standards, which are being codified in the appropriate prevailing instructions and guidance.

Evidence of Other Funds

In the instance that funds are leveraged from other sources for projected authorized under this program, evidence of the availability of monies should be collected. There is no leveraging requirement, so this is only applicable in said instances.

Supporting Documentation

Applicants must provide documentation of legal organization and authority to borrow funds, construct, operate, manage the facility, etc. The documentation may include articles of incorporation, certificate of incorporation and good standing, bylaws, rules, and organizational minutes. Applicants also must provide financial information such as financial statements, audits, or existing debt instruments. This information is necessary for RUS to determine an organization's legal existence, authority to perform certain functions, and financial capacity to borrow funds.

Statement on availability to obtain credit elsewhere

Applicants must certify in writing that they are unable to finance the proposed project from their own resources or through commercial sources at reasonable rates and terms. The CONACT, as amended, requires the credit elsewhere analysis and statement. Form RUS Bulletin 1780-22, Eligibility Certification, may be used by borrowers.

Project Narrative

Applicants will provide a project narrative detailing the project to be financed with the SEARCH grant funds. The narrative will also provide details on the activities or tasks to be accomplished, objectives, timetables for task completion, and anticipated results.

Certifications for Contracts, Grants, and Loans (Regarding Lobbying):

Applicants must identify and report any known lobbying activity.

Certification regarding prohibited tying arrangements.

Applicants that provide electric service must provide the Agency a certification that they will not require users of a water or waste facility financed under this part to accept electric service as a condition of receiving assistance.

Statement Concerning Assistance Under the National Forest Service-Dependent Rural Communities Economic Diversification Act.

Applicants must contact the Forest Service and RUS to find out if any geographical or local areas have received grants for technical assistance to a forest-dependent rural community in a five-year period. SEARCH grant funds cannot be used to duplicate technical assistance provided to a forest-dependent rural community under the National Forest-Dependent Rural Communities Economic Diversification Act of 1990. Applicants must submit documentation that such duplicate assistance has not been given.

Public Information/Evidence of Public Notice

Applicants must publish a notice of intent to file an application with RUS in a general circulation newspaper. Applicants also must conduct a public information meeting to allow public input into the proposed project when an election by the membership or public referendum is not required. They must provide RUS a copy of the published notice and minutes of the public meeting, which serve as documentation of the meeting.

Agreement for Engineering Services Agreements for Professional Services

Applicants must contract for the professional services rendered from an engineer, attorney, bond counsel, accountant, auditor, appraiser, or financial advisor. Contracts or other forms of agreement for services necessary for project planning and development are subject to RUS concurrence. Applicants must submit a narrative of the services to RUS for review and concurrence to ensure the needed services will be available at a reasonable cost.

Letter of Conditions

The Letter of Conditions is a narrative document that outlines all of the terms and conditions of the proposed award, which vary by project. The document is initially prepared by RUS/RD staff, however, each section is reviewed and concurred with the applicant's authorized representative. RUS Bulletin 1780-19, Water and Waste Letter of Conditions, provides the initial template.

Management Reports

All borrowers must furnish management reports that will provide management a means of evaluating prior decisions and serve as a basis for planning future operations and financial strategies. This requirement is necessary to help assure that the facility will be properly managed and to protect the financial interest of the Government.

Relationship or Association with RUS Employees

Applicants must identify and report any known relationship or association with a RUS employee such as close personal association, immediate family, close relatives, or business associates.

SF 3881 - ACH Vendor/Miscellaneous Payment Enrollment Form

This form is completed by both the grantee and their local banking representative. The form is executed by the local banking representative to confirm that the bank accounts that has been selected for the deposit of RUS monies is accurately represented and is an active account of the organization.

FORMS under this collection 0572-0146

RD Form 1940-1, Request for Obligation of Funds

In the instance that a project is deemed eligible and monies are available, the Request for Obligation of Funds form is issued to the borrower. This form, used across all Rural Development programs, provides a summary of the terms of the award. The document is reviewed by both the RUS and the grantee, and then executed by both parties.

RECORDKEEPING REQUIREMENTS:

Borrower and Contractors Shall Maintain Accounting Records for 3 Years

These records are required so the Agency or the Comptroller General (or their representatives) may review them to determine that the borrower has complied with all financial requirements.

The following information/forms are collected and accounted for under other collection packages:

Form RD 400-8, "Compliance Review" (Cleared under 0575-0018).

In accordance with RD Instruction 1901-E and applicable statutes, a Compliance Review must be completed for each award. Subsequent reviews are to be completed as outlined. The purpose of the review is to ensure that there are no inequities in the service being provided. This also applies to the organization's composition in addition to the system users. The Form RD 400-8 outlines the applicable questions and topics.

SF- 424, Application for Federal Assistance. (cleared under 4040-0004)

Applicants use this form as a required cover sheet for applications submitted for SEARCH grants. The application is an official form required for all Federal grants and requests basic information about the applicant and the proposed project.

SF-424A, Budget Information--Non-Construction Programs. (cleared under 4040-0006)

Applicants project costs and expenses for the grant project. The form also provides information on matching funds. This form is submitted as part of the pre-application and if the project is selected, as part of the formal application.

SF-424B, Assurances--Non-construction Programs. (cleared under 4040-0007)

Applicants read and sign this form to indicate the organization's intent to comply with the laws, regulations, and policies to which a grant is subject.

RD 400-1, "Equal Opportunity Agreement" and RD 400-4, "Assurance Agreement."(cleared under 0575-0018)

Applicants read and sign these forms to assure RUS that they agree to and will comply with Title VI of the Civil Rights Act of 1964, and the Equal Opportunity Clause under Executive Order 11246 of September 24, 1965.

RD 442-3, Balance Sheet and RD 442-7, Operating Budget. (cleared under 0575-0015)

Applicants use the forms to state their current financial standing, project income and expense items, and a complete cash flow through the first full year of operations after they use the award proceeds. These projections are necessary in determining their current financial standing and need for grant proceeds.

AD 1047, Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered Transactions. (cleared under 0505-0027)

USDA regulations published at 7 CFR Part 3017 implement the government-wide debarment and suspension system for USDA's non-procurement transactions. Applicants for SEARCH grants are required to provide certification under these regulations. Form AD-1047 may also be used to obtain the required certification.

AD 1048, Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Transaction. (cleared under 0505-0027)

Form AD-1048 will be signed by applicant's suppliers, auditors, contractors, etc., and retained by applicant in their files.

AD 1049, Certification Regarding Drug-Free Workplace Requirements (Grants) Alternative I - for Grantees Other Than Individuals. (cleared under 0505-0027)

USDA regulations published at 7 CFR Part 3017 implement the Drug-Free Workplace Act of 1988, which requires that grant recipients agree that they will maintain a drug-free workplace. Applicants are required to provide certification under these regulations. Form AD-1049 may also be used to obtain the required certification.

AD 3030, Representations Regarding Felony Conviction and Tax Delinquent Status for Corporate Applicants. (cleared under 0505-0025)

Established in the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2012, at the time of application all corporate applicants must read, answer three questions, and certify as to whether the entity or any agents acting on its behalf have been convicted of a felony with the preceding 24 months and/or the organization is currently delinquent on federal taxes.

AD 3031, Assurance Regarding Felony Conviction or Tax Delinquent Status for Corporate Applicants. (cleared under 0505-0025)

Set forth in the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2012, prior to funding commitment all corporate applicants must sign a certification declaring that they neither have an open conviction against the corporation or an agent acting on its behalf within the last 24 months, and that the entity is not in Federal tax delinquent status.

RD 1942-46, Letter of Intent to Meet Conditions. (cleared under 0575-0015)

Applicants must certify on this form that they intend to meet the items set forth in the Letter of Conditions within the timeframe established therein. If such conditions are not met within said timeframe than the Agency retains the right to reconsider the terms offered.

RUS Bulletin 1780-12, Grant Agreement (cleared under 0572-0121)

The Grant Agreement sets forth the terms and conditions under which the applicant receives a RUS grant. Applicants and RUS must execute the document before RUS disburses grant funds.

RD 1942-8, Resolution of Members or Stockholders. (cleared under 0575-0015)

Nonprofit applicants prepare this form to indicate that the governing body has the authority to enter into a grant of a particular amount with RUS.

RD 1942-18, Partial Pay Estimate. (cleared under 0575-0042)

This form is used as a medium for the applicant to request grant funds for work related to the award.

Form RD 442-2, "Statement of Budget, Income, and Equity" (Cleared under 0575-0015).

This form serves a dual purpose as a budget and an income and expense statement. RUS/RD generally requires new borrowers to submit it each quarter for the first 3 years so the agency can monitor financial progress in the early years of operation. The report is then discontinued for those borrowers that are progressing satisfactorily. As a budget report, borrowers must submit their budget estimates before the beginning of each fiscal year. In these cases only,

column three is to be completed. Borrowers, at their option, may also use this form as a year-end income and expense statement when audited financial statements are not prepared. This form was previously listed as RD 442-14.

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 and responses, and the basis for the decision for adopting this means of collection.

RUS is committed to complying with the requirements of the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. RUS introduced RD Apply, an electronic application system, in September 2015. The system digitizes all feasible components of the application. RD Apply incorporates fields for basic, service area, project, and financial items. Also, it allows for the applicant to submit attachments and to electronically authorize numerous forms, including OMB documents. RD Apply is a secure, internet-based program accessible through any network ready device. RUS/RD is aggressively promoting and encouraging the use of RD Apply. For FY 2019, RUS's goal is to receive at least 75 percent of its applications electronically. This percentage, which is currently being exceeded, will continue to increase until approximately 90 percent of applications received are electronic.

In addition to RD Apply, RUS/RD released the Electronic Preliminary Engineering Report ("EPER") in September 2017, which further evidences efforts to fully automate the application process. EPER can communicate and transfer information to RD Apply reducing duplication. It is noted that additional phases of automation and enhancements are under development.

The application process requires multiple types of forms—with the prefixes AD, RD, RUS Bulletins, and SF—as well as supporting documents and certifications. Recognizing that some RUS applicants are unable to utilize the fully electronic platform, forms are also available electronically in fillable, printable format. Applicants may submit completed forms electronically as an email attachment or provide paper copies as appropriate. The forms are available through the RD/RUS website or the USDA Service Center eforms locator link at <http://www.rurdev.usda.gov/rd/formlocator.html>. Government-wide (AD and SF) forms may also be retrieved through the Office of the Chief Information Officer at <http://www.ocio.usda.gov/policy-directives-records-forms/forms-management/approved-computer-generated-forms>

In addition to forms, applications require documents that are not forms: financial statements, audits, and certifications from the applicant and other parties involved in the project. These documents may be submitted electronically, where possible. The documents cannot always be submitted electronically with the required forms because of

the electronic size of some of the drawings, charts, graphs and maps, and due to differing computer capabilities. RUS and Rural Development (RD) State offices recommend parties interested in applying for this program notify the agency prior to completing an application package. A RUS/RD representative will meet with interested parties to explain the application process, provide guidance on how to complete required forms, and direct applicants on where to submit the documents.

4. Describe efforts to identify duplication.

RUS has reviewed all financial assistance programs it administers to determine which programs may be similar in intent and purpose. If applicants or borrowers are applying to or participating in more than one RUS program simultaneously, the agency makes every effort to accommodate the requests within the same set of applications and processing forms. If applicants are applying for or receiving a loan or other financial assistance from another Federal agency, RUS would use the forms and documents furnished the other agency as much as possible. Efforts are exemplified through undertakings such as the RUS Bulletin 1780-2, Preliminary Engineering Report for Water and Waste Disposal Program, which adopts an inter-agency template developed in coordination with the U.S. Environmental Protection Agency, U.S. Department of Health and Human Services, and U.S. Department of Housing and Urban Development.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

The term “small entity” has the same meaning as the terms “small business”, “small organization”, and “small governmental jurisdiction” in accordance with 5 U.S.C. 601(6). The Small Business Administration (SBA) has established a Table of Small Business Size Standards, which matches to industries described in the North American Industry Classification System (“NAICS”). According to the small business size standards, 100 percent (865 respondents) of the applicants and borrowers of the programs covered herein are classified as small entities. Information to be collected is in a format designed to minimize the paperwork burden on small businesses and other small entities. All of the forms are available electronically and RUS/RD does not prohibit transmission of the information electronically. The information to be collected is unique to each loan or grant and is the minimum RUS/RD needs to approve loans and grants, monitor borrower performance, and carry out the authorized programs.

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 information collected under these programs is the minimum necessary to conform to the requirements of the program regulations established by law. Information is collected

when needed and cannot be collected less frequently to meet the requirements of the programs. Failure to collect proper information could result in improper determinations of eligibility or improper use of funds.

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

- a. Requiring respondents to report information more than quarterly. There is no information collection requirement that require specific reporting on more than a quarterly basis.
- b. Requiring written responses in less than 30 days. There is no information requirement for written responses in less than 30 days. However, in cases where a borrower's income or financial situation has declined, the borrower should provide RUS information as soon as possible. RUS cannot provide the borrower program benefits until it receives documentation to support the borrower's request.
- c. Requiring more than an original and two copies. There may be some rare instances where more than the designated number of forms is necessary. For instance, payment requisition forms are signed by the contractor, engineer, applicant, and RUS/RD. This would require an original and three copies.
- d. Requiring respondents to retain records for more than 3 years. In the instance that an applicant is in arbitration, mediation, or litigation, the applicant may be required to retain the appropriate documents beyond 3 years. Guidance is further outlined in RD Instruction 1951-E, Servicing of Community and Insured Business Program Loans and Grants, and RD Instruction 2033-A, Records Management in RD Field Offices.
- e. Not utilizing statistical sampling. Not applicable.
- f. Requiring use of statistical sampling which has not been reviewed and approved by OMB. There are no such requirements.
- g. Requiring a pledge of confidentiality. On a rare occasion, an applicant such as a federally recognized tribe, may request some level of confidentiality. This is generally limited in scope, commonly relating to financials, and in no way impedes the ability of the Agency to properly examine and process the application.
- h. Requiring submission of proprietary trade secrets. There are no such requirements.

8. Describe efforts to consult with persons outside the Agency to obtain their views on 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.

As required by 5 CFR 1320.9(d), a sixty (60) day Notice to request public comments was published in the *Federal Register* on March 25, 2019 at 84 FR 11047. No comments were received.

The agency field offices maintain close contact with borrowers through RD Area and State Offices. Suggestions and comments are continuously solicited and considered by RUS. From June through August 2019, RUS contacted the following individuals outside the Agency to obtain their views on the paperwork burden imposed by this regulation:

Danielle James Choiniere
South Alburgh Fire District No. 2
1 North Main Street, Suite 2
Alburgh, VT 05440
Phone: (802) 796-3763

The South Alburgh Fire District No. 2 (District) supplies potable water to 839 residents in northern Vermont. Water quality concerns for private well owners in the region led to the formation of the District in 2004. This SEARCH grant is being used to enable the District to complete the technical documents needed to explore the possibility of extending the water main along the eastern portion of Village of Alburgh, including engineering and environmental reports. The District received a \$30,000 grant on January 17, 2018. The work has been completed and the award resulted in a capital project that was obligated on August 8, 2019. Ms. Choiniere noted that the District worked closely with their project engineer to complete this application. She noted that the engineer informed them of this program and obtained most of the required forms and certifications in coordination with the local Rural Development field office. Ms. Choiniere felt that, based on her exposure to the application development, the level of information collected was reasonable, and that the requirements were easy to understand, interpret, and satisfy. In addition to the structured questions, she added that the process had ebbs and flows. The District would hurry up to complete a stage of processing and then there would be down-time, which was followed by another segment requiring a fast turnaround.

Rebecca Price-Hall
Grant and Project Coordinator, City of Trinidad
P.O. Box 390, 463 Trinity Street
Trinidad, CA 95570

Phone: (707) 499-6454

The City of Trinidad (City) received a SEARCH grant of \$26,000 on May 24, 2018. The grant was used to complete planning documents related to a proposed Storm Water Drainage project. Ms. Price-Hall stated that she found out about the program through USDA staff. She was able to use RD Apply to submit the application electronically, which aided in gathering and completion of forms. Ms. Price-Hall found the level of information requested to be reasonable and the information requested to be easy to understand, interpret, and satisfy. Similarly, she has found the recordkeeping and reporting requirements to be easy to understand, interpret, and satisfy. The SEARCH award has led to the completion of their scope of work and a full capital improvement project is anticipated. Ms. Price-Hall commented that “it took us a while to find out about the SEARCH grant program – it could be better publicized.”

Amy Sorenson
WWTF Project Manager, Town of Peetz
621 Main Street, PO Box 7
Peetz, CO 80747
Phone: (970) 571-0241

The Town of Peetz (Town) received a \$30,000 SEARCH grant on March 7, 2017 in order to complete the engineering and environmental technical documents needed to evaluate various alternatives for improvements to their wastewater facility. Serving 238 residents in the northeastern corner of CO, the plant in operation was constructed in 1965 and has outlived its useful life. Ms. Sorenson noted that the Town learned about this program from its project engineer. The SEARCH application did lead to a capital project, which was obligated on July 2, 2019. The application was not submitted online, but the construction project did utilize the electronic submission portal, RD Apply. Ms. Sorenson felt that the application documents were easily accessible, the level of information collected was reasonable, and that the requirements were easy to understand, interpret, and satisfy. No additional comments were provided beyond.

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

There is no payment or gift to respondents.

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

No assurance of confidentiality is provided. Under the Freedom of Information Act, the public can request most data collected from respondents. The information collected under the provisions of these programs is not considered to be confidential.

Organizations such as nonprofit entities and public bodies from which the information is collected ordinarily are required to make their activities available for public scrutiny.

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.

The information collected does not contain any questions of a sensitive nature such as sexual behavior, religious beliefs, or other matters commonly considered private.

12. Provide estimates of the hour burden of the collection of information.

The burden estimate information for this package was derived from past activity in the program. There were 133 applications received in FY 2016, 97 in FY 2017, and 104 in FY 2018. The average number of applications submitted during that timeframe was 111. The three fiscal years noted are considered to be typical. Thereby, the Agency anticipates receiving 111 applications and awarding approximately 105 grants.

See the attached spreadsheet for a breakout of the forms included in this package. The collection is summarized as follows:

Regulation	Number of Respondents	Total Annual Responses	Total Annual Hours
7 CFR Part 1774	111	1,578	3,380

RUS/RD estimates the burden to be \$153,488.18 to the respondents to comply with this regulation. RUS/RD estimates that for each request approximately 50 percent of this time is professional (1,848 hours) and 50 percent is clerical (1,847 hours). The primary professional respondent would be a town, utility, or corporate manager. The Department of Labor, Bureau of Labor Statistics, Standard Occupational Classification wage rates were used as the basis for the cost estimates. The mean hourly earnings for Clerical time are \$19.41 (43-4031 Court, Municipal, and License Clerks) and Professional time earnings are \$44.63 (11-0000 Management Occupations). The Local Government designation was used to classify the wage rates.

The standard rates are then multiplied by the fringe benefits published in the Employer Cost for Employee Compensation, Supplemental Tables, produced by the Bureau of Labor Statistics. For private utility workers. This figure provided was 29.70 percent¹. This increased the wage rates to \$25.18 and \$57.89, respectively. The cost of the collection is summarized as follows:

¹ Benefit rates for private sector employees in Private trade, transportation, and utilities industry workers is provided by Bureau of Labor Statistics Historical Data issued in June, 2019. See: Employer Costs for Employee Compensation, Supplemental Tables, Historical Data, March, 2004 – March, 2019, page 286. Retrieved from <https://www.bls.gov/web/ec/ec/ecqqrtn.pdf>. Benefit as a percentage of total compensation for private sector employees in the utilities industry in March, 2019 was 29.7%.

Cost to the Public:

Wage Category	Hourly Wage and Benefits ¹	Hours	Cost of Burden
Professional time:	\$57.89	1,848	\$106,980.72
Clerical time:	\$25.18	1,847	\$ 46,507.46
			\$153,488.18

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

There are no capital and start-up costs or purchase of services components involved with this collection.

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

Actions by the agency are necessary to administer the SEARCH program. This includes interactions and reviews completed at three different levels: (1) field office; (2) state office; and, (3) National Office. Primarily, the field office, which may be an area or sub-area office, is responsible for processing and servicing the portfolio. The Area Specialist and any Area Technicians sit in the field office. This includes application intake, eligibility determinations, underwriting (funding recommendations), obligation, closings, project monitoring, and routine servicing actions. The state office is responsible for general oversight of the field offices, policy implementation, funding deployment, specialized actions, and coordination with the National Office. Program Support Staff, including the State Engineer, Architect, Environmental Coordinator, etc., sit in the state office. Thereby, technical documents prepared through this program, including the Preliminary Engineering Report, Environmental Report, Feasibility Studies, and other technical documents are processed at that level. The National Office is responsible for program oversight, policy creation/interpretation, maintaining reserves, and other advanced actions, such as specialized servicing.

Field staff perform approximately 60 percent of the processing (72 hours). State office staff, including Program Support Staff, complete an estimated 30 percent of processing (36 hours). Finally, National Office staff contribute roughly 10 percent of processing (12 hours). Field and state office wage rates are \$45.29, based on the hourly wage rates for loan analysts (GS 12, Step 5) in the locality pay area of Washington-Baltimore-Northern Virginia. Using the preceding locality pay area, the National Office wage rates are \$53.85, based on the hourly wage rate for loan analysts (GS 13, Step 5). The estimated rate of cost of total benefits for civilian Federal Government employees is 36.25 percent ²

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

for percentage of benefits as a portion of total hourly wage and was provided by the OMB Memoranda referenced in the footnote below. Thereby, the total rate for field and state office staff is \$61.71, and it is \$73.37 for National Office staff. The wage rate used below (\$62.88) was calculated using a weighted average of the state, field, and national office time involved in the processing.

RUS estimates the cost to the Federal Government to administer the activities of this program to be \$822,470.40 per year. The following sections are as they appear in the RUS Form 36 Spreadsheet:

Application review phase—80 hours X 111 applications X \$62.88=	\$ 558,374.40
Approval/following obligation- 40 hours X 105 obligations X \$62.88=	\$ 264,096.00
Total Cost to the Federal Government:	\$ 822,470.40

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

This is an extension with a revision of a previously approved information collection. There was an decrease of 14 respondents from the previous collection of 125 respondents to 111 for this collection.

The current burden hours for this collection is 3,380 which is a decrease of 308 from 3,688 burden hours in the previous collection. The change is due to the fluctuation from year to year with how many approved applicants utilize the program as well as the number of qualified applications received during the year. Additionally, changes were needed for the forms used in calculations due to changes in enabling legislature and procedures.

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

RUS has no plans to publish the information collected under the provisions of this program.

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

No such approval is requested.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-I.

There are no exceptions requested.

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.