

## **Supporting Statement**

### **USDA Local and Regional Food Aid Procurement Program**

**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 U.S. Department of Agriculture's Foreign Agricultural Service (FAS) awards funds to recipients under the USDA Local and Regional Food Aid Procurement Program (USDA LRP Program). The Food, Conservation, and Energy Act of 2008 (the "2008 Farm Bill"), as amended by the as amended by the Agriculture Improvement Act of 2018, Public Law 115-334, provides that the Secretary of Agriculture will provide grants to, or enter into cooperative agreements with, eligible organizations to implement field-based projects that consist of local or regional procurements of eligible commodities in developing countries to provide development assistance and respond to food crises and disasters, in the case of emergencies, in consultation with United States Agency for International Development's (USAID) Office of Food for Peace. The intended effects of the USDA LRP Program are to support development activities aimed at strengthening the trade capacity of food-insecure developing countries and to address the cause of chronic food insecurity.

The USDA LRP Program adds another mechanism to deliver food assistance to the federal programs currently providing assistance, including Title II of the Food for Peace Act ("P.L. 480") and International Disaster Assistance as part of the Foreign Assistance Act, both of which currently utilize LRP and which are, administered by the U.S. Agency for International Development, and USDA's Food for Progress Program and McGovern-Dole International Food for Education and Child Nutrition ("McGovern-Dole") Program. The USDA LRP Program aims to support development activities to strengthen the capacity of food-insecure developing countries and address the cause of chronic food insecurity. Other objectives of the USDA LRP Program are to support the consumption of locally produced food and strengthen local value chains and all associated procurement activities. The program will focus primarily on development programs, although the rule also provides for the furnishing of food assistance through an emergency response. Any emergency response will be closely coordinated with other U.S. government agencies handling emergencies, including USAID's Food for Peace, to ensure programs are complementary, and not duplicative.

The Office of Capacity Building and Development (OCBD) released Opportunity for Funding Announcements for the LRP program from FY 2016 to FY 2019. Over this period of time, FAS received an average of six proposals per year from four unique applicants annually. Of these applicants, three were private voluntary organizations (PVOs) and one was by the World Food Programme (WFP). After an extensive

competitive panel review, OCBD recommended funding an average of three new proposals per year.

<b>Information Required for Collection</b>	<b>Explanation and Reason for Information Collection</b>	<b>Legal Requirement</b>
<i>Proposal: Introductory Statement, Plan of Operation, Initial Budget, SF-424, Proposed Results</i>	<p>Applicants must submit to FAS a detailed program proposal that includes a SF-424, an introduction and impact analysis, a budget proposal, an evaluation plan, unless otherwise specified in the notice of funding opportunity, and a plan of operation that explains how it will carry out the program. The applicant must also submit a project-level framework that includes proposed outcomes of the activities. Applicants must also meet eligibility requirements stated in the LRP Regulations (7 CFR Part 1590 and 1590.1) as follows:</p> <ul style="list-style-type: none"> <li>• An entity (including subcontractors/subgrantees) will be considered ineligible if they have been designated by the US Government as debarred or suspended in procurements funded by the United States Federal Government or otherwise prohibited by applicable United States law or executive order or United States policies. These submissions help determine an applicant's eligibility and competitive status for program funding.</li> </ul>	7 C.F.R part 1590 (LRP)
<i>Agreements Negotiation</i>	<p>Once a proposal is approved, a legal agreement will be established to outline the terms and conditions for the implementation of the program. The Participant Information will be collected from the proposal application (plan of operation, budget, and results). To the extent that the information was not included or was unclear in the application, FAS may</p>	7 C.F.R part 1590.5 (LRP)

	<p>seek additional details about the following: (1) Plan of operation, including project objectives and detailed activity descriptions. The agreement will also set forth that commodities can be procured locally or regionally without a disruptive impact on farmers located in, or the economy of, the target country or any country in the target region. The burden hours reflect the efforts in editing or clarifying the information from the proposal into the legal agreement.</p>	
<p><i>Amendments to Agreements</i></p>	<p>When a Participant needs to change the operational budget and/or the project design (for reasons unforeseen during the agreement negotiation), the Participant and FAS must negotiate an amendment to the agreement. An amendment is necessary to document the concurrence between FAS and the Participant to the changes in the project.</p>	<p>7 C.F.R part 1590.5 (LRP)</p>
<p><i>Ocean Transportation Documents; Survey</i></p>	<p>Participants must acquire all transportation of procured commodities under the USDA LRP Program. Participants that acquire ocean transportation must comply with the requirements of 46 U.S.C. 55305, regarding carriage on U.S.-flag vessels and must declare in the transportation contract the point at which the ocean carrier or overland transportation company will take custody of the eligible commodities to be transported. Participants will be responsible for arranging for an independent cargo surveyor to inspect any procured commodities transported by ocean upon discharge from the vessel and to prepare a survey or outturn report. Participants must retain copies of and make available to FAS</p>	<p>7 C.F.R. 1590.8 (LRP) 7 C.F.R. 1590.10 (LRP) 7 C.F.R. 1590.14 (LRP)</p>

	all sales receipts, contracts, or other documents related to the procurement of eligible commodities, as well as records of dispatch received from ocean carriers or overland transportation companies.	
<i>Written Agreement Between a Participant and Subrecipients</i>	A copy of the written agreement between the Participant and sub-recipient is required before the transfer of any procured commodities, FAS-provided funds, or program income to the sub-recipient. The Agreement requires sub-recipient to pay the Participant the value of any procured commodities, FAS-provided funds, or program income that are not used in accordance with the sub-agreement, and for lost, damaged or misused commodities if the subrecipient is at fault.	7 C.F.R. 1590.15 (LRP) 7 C.F.R. under Paragraph 1590.2 (LRP)
<i>Documentation of Damaged or Lost Commodities</i>	Participants must provide any documentation prepared by an independent surveyor to FAS. These surveys are collected through the Web-Based Supply Chain Management System or e-mail. If commodities with a value greater than \$5,000 are lost or damaged, FAS requires: (1) a written report explaining the circumstances of the loss or damage, (2) a certification by a public health official on commodity condition and exact quantity of damaged commodity that are disposed, and (3) a report of action taken to dispose of any commodities unfit for authorized use.	7 C.F.R. 1590.10 (LRP)
<i>Claims for Damage to or Loss of Commodities</i>	For damages or losses greater than \$20,000, the Participant must provide FAS with detailed information about the circumstances surrounding the damage/loss and the quantity and value of the damaged/lost commodities. The participant is	7 C.F.R. 1590.11 (LRP)

	required to promptly initiate a claim and if appropriate an action to collect pursuant to a commercial insurance contract and provide to FAS all copies of documentation surrounding the claim. The value of the claim will be determined by the commodity acquisition, transportation, and related costs incurred by the recipient and paid by FAS.	
<i>Agreement Reporting Requirements: Semi-annual Financial and Performance Reports</i>	FAS requires that participants conduct performance reports and financial reports on a semi-annual basis. These reports are necessary to ensure that commodities are dispersed, funds are spent, and activities are conducted in full compliance with the agreement. The information is collected within the electronic Food Aid Information System.	7 C.F.R. 1590.14 (LRP)  2 CFR § 200.328(b) (2)
<i>Single Audit</i>	Participants are required to submit an annual single audit until all procured commodities are completely distributed and/or all program income is fully disbursed. These audits are necessary to ensure the Participant's financial accountability. The information is collected within the electronic Food Aid Information System.	7 C.F.R. 1590.19 (LRP)  2 CFR § 200.501
<i>Compliance and Evaluation: Mid-term and Final Evaluation Reports; Program-Specific Audit</i>	FAS requires that all Participants submit an evaluation plan, performance monitoring plans, mid-term and final evaluation reports, and a program-specific audit. In emergency responses, a rapid needs assessment and a final evaluation report are required for all agreements, unless otherwise specified in the agreement. An interim evaluation report is not required for emergency response projects, unless otherwise specified in the agreement. This information collection is essential to	7 C.F.R. 1590.14 (LRP)  2 CFR §§ 200.327 through 200.329

	ensure the accountability of food assistance programs. The information is collected within the electronic Food Aid Information System.	
<i>Advance Payment Request</i>	A Participant may request advance payment up to the total amount specified in the agreement and must document all advance funds under the agreement. This information is necessary to reconcile accounts once programming is finished.	7 C.F.R. 1590.7 (LRP) 2 CFR § 200.305(b)
<i>Agreement Closeout: Equipment Disposition Information, Tax Certification</i>	When an agreement is ready to be closed out, the Participant must comply with the closeout procedures stated in the agreement.	7 C.F.R. 1590.17 (LRP) 2 CFR §§ 200.343 and 200.344
<i>Maintenance of Records and Reports</i>	Financial records, performance reports, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report. These records must be kept for use in post-program evaluation and to ensure compliance.	7 C.F.R. 1590.14 (LRP) 2 CFR §§ 200.333 through 200.337

The implementation of two electronic systems – the Web-Based Supply Chain Management System and the Food Aid Information System – have significantly reduced the amount of hard copy documents FAS receives. Information collected at each point in the business cycle is retained and used by the systems at later points in the cycle. These collections are necessary to respond to recommendations for improvements in monitoring and evaluation and oversight. The electronic systems allow for efficient collection and analysis of results and compliance.

**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.**

Information is collected from the Participant to determine its ability to carry out a food aid program, to establish the terms under which procured commodities will be provided, to monitor the progress of procurement of commodities (including how transportation is procured), to monitor the progress of expenditure of funds, and to evaluate both the program’s success and the Participant’s effectiveness in meeting intended results. An explanation of how and for what purposes FAS uses specific collected information is detailed in the list below.

- **Proposal (Introductory Statement, Plan of Operation, Initial Budget, SF-424):** FAS uses this information to select applicants for participation in food assistance programs. It is critical to program oversight that FAS be acutely aware of a Participant's qualifications and the project's objectives before providing funding to the applicant for the project.
- **Agreement Negotiation:** After a proposal is approved, the agreement negotiation with the Participant requires editing, clarification, and insertion of the information from the Proposal into a legal agreement. The agreement establishes the terms under which funds will be provided. The agreement which includes the budget documents is necessary to establish that procured commodities under these programs are used effectively and in a way that is deemed acceptable by the Federal Government. FAS uses the agreement as a binding document governing project implementation.
- **Amendment(s):** Agreements are sometimes amended to accommodate changes in the budget or program objectives. Again, a legal agreement is necessary to establish that procured commodities under these programs are used effectively and in a way that is deemed acceptable by the Federal Government.
- **Transportation Documents:** If freight forwarders must submit to FAS documents related to transportation of the commodities, including freight invitations, charter parties or booking notes, freight offers, and freight forwarder certifications. FAS reviews these documents to ensure a fair tendering process and that the lowest cost vessels are approved for shipment.
- **Freight Payments and Supporting Documentation:** FAS uses this information to ensure financial accountability in ocean transportation and to ensure that commodity shipments comply with the requirements of 46 U.S.C. 55305, regarding carriage on U.S.-flag vessels. Additionally, FAS reviews supporting documentation established by the independent survey of the procured commodities. Some of these documents are also utilized by USDA's Kansas City Commodity Office and by the Maritime Administration.
- **Agreement between Participants and Subrecipients:** FAS reviews these documents to ensure that subrecipients are in compliance with the terms and conditions of the agreement between FAS and the participant. Additionally, the collection of these documents is essential to project accountability and to ensure that all key parties implementing the project are taking required actions.
- **Documentation of Lost or Damage Commodities:** Discharge surveys and other damage/loss information are used by FAS to ensure that Participants are taking needed actions to recover damages from transportation companies. FAS retains the right to assume responsibility for claims if Participants do not perform satisfactorily. The documentation is critical in the event that litigation is required.

- **Documents Supporting Claims on Damaged or Lost Commodities:** In the case of extensive losses or damages, FAS uses this documentation to support claims for compensation for missing commodities.
- **Reporting Requirements:** FAS requires that participants submit semi-annual financial and performance reports. These reports are essential to FAS's monitoring of active food aid agreements. FAS analysts review these documents to ensure the transparent flow of procured commodities until final distribution. Moreover, FAS uses these reports to ensure that commodities are dispersed, funds are spent, and activities are conducted in compliance with the signed agreement. Progress on performance metrics is reported through the performance reports. This information is needed to satisfy statutory requirements, to assure that public resources are used properly, and to prevent fraud and abuse.
- **Single Audit:** FAS staff review these documents (submitted annually) to ensure that participants are in financial compliance with federal regulations governing entities receiving US Government assistance.
- **Compliance and Evaluation Documents:** FAS requires mid-term and final evaluations, final needs assessments for emergency projects, as well as program-specific audits – conducted by an independent third party. FAS also requires evaluation plans and details on intended results. These collections help FAS to determine the effectiveness of each project and the contribution to the programs' results.
- **Advance Payment Requests:** FAS uses this information to authorize advance payment requests to Participants. This information is necessary to ensure that all accounts are reconciled when programming is complete.
- **Agreement Closeout:** FAS uses this information to ensure that the agreement is in compliance with federal regulations for the closeout of government grants.
- **Maintenance of Records and Reports:** The Participant must maintain records for a period of three years from the date of submission of the final expenditure report. FAS has the authority to inspect these records in order to evaluate a Participant's compliance with the terms and conditions of an agreement. Additionally, FAS uses these records to evaluate whether a Participant should be selected to implement future programming. Finally, USDA and Congress sometimes use these records to evaluate the effectiveness of food assistance programs.

**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.**

The vast majority of information collected from Participants is submitted electronically through the Web-Based Chain Management System, the Food Aid Information System, or e-mail. The reliance on electronic data collection has resulted in a significant reduction in both the required paperwork and in the time it takes Participants to prepare and submit the information. FAS has moved the application process, the grant agreements, reporting, and payment processes to the on-line Food Aid Information System. This transition has provided external stakeholders with a one-stop and consistent entry point. The system also reduces agency time in reviewing applications, agreements, payments, and reporting.

**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 has made an effort to identify and eliminate duplication in information collection for food assistance programs. Some examples include:

- Single Audit: Even if a participant has multiple active food aid agreements, it is only necessary for the entity to submit one copy of its single audit every year.
- Tax Certifications: Although FAS requires tax certification information on every active food assistance agreement, this information can all be submitted in the same document to avoid unnecessary effort and paperwork.
- The electronic systems maintain data throughout the multiple points in the food aid business cycle. The data are aligned with the key parts of the business cycle and made available at multiple, relevant points. In summary, data is generally entered once and does not have to be re-entered at the multiple points in the business cycle.

FAS has eliminated or greatly reduced redundancy for each grant agreement and related procurement. Information collection is tied to each grant agreement and related procurement. Each grant agreement and procurement has specific requirements and business opportunities for stakeholders that require separate information collections. A single information collection cannot cover multiple agreements and procurements.

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

Of the eight respondents, the agency estimates zero are small businesses.

**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 information collection is necessary to satisfy statutory requirements and to assure that public resources are properly used under food assistance programs. These programs involve the procurement of agricultural commodities, and some information collection is necessary to establish a minimum level of accountability and to prevent fraud and abuse. Semi-annual reporting by participants permits the tracking and monitoring of procured commodities. Less frequent reporting would make it significantly more difficult to monitor and evaluate the effectiveness and compliance of Participants' program implementation.

Because FAS funds the transportation costs of locally and regionally procured commodities, it is essential for Participants to submit their documents related to the procurement of commodities to USDA for approval in order to ensure that transportation is procured in a fair manner and at the lowest cost possible to the federal government. Moreover, in cases of ocean transportation, ship owners/brokers are required to submit documents to ensure that all the contractual obligations have been met prior to payment. Likewise, submission of surveys is necessary in order to have a full accounting of the commodities shipped, including any losses or damages. Lessening any of these requirements could result in less accountability to the federal government in the freight procurement process.

**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:**  
Documentation is provided on a procurement-by-procurement basis, depending on the volume of commodities that need to be moved at any given time.
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:**  
Respondents always are given more than 30 days to prepare reports, proposals, and evaluations.
- **Requiring respondents to submit more than an original and two copies of any document:**  
This does not apply because the Participants submit information collection documents electronically.
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years:**  
This does not apply, because participants are only required to keep records for three years after the date that the final expenditure report is submitted. (2 CFR §§ 200.333 through 200.337)

- **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:**  
There are no statistical surveys required by food aid information collections.
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:**  
There are no statistical surveys required by food aid information collections.
- **Including 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:**  
There is no assurance of confidentiality provided to respondents in food aid information collections.
- **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:**  
No confidential information is required by food aid information collections.

**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 C.F.R. 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 information collection was published in the Federal Register on Monday, November 18, 2019 (84 FR 63605). No comments were received for this notice. A copy of the notice is attached.

FAS contacted several private voluntary organizations to obtain their estimates of the burden hours associated with preparing food aid information collections and maintaining records of those documents.

The following private voluntary organizations were contacted:

Organization	Contact Name	Contact Email
Counterpart International	Brian Dotson	bdotson@counterpart.org
Project Concern International	Mazen Fawzy	mfawzy@pciglobal.org
Catholic Relief Services	Tim Boom	timothy.boom@crs.org

Of the three organizations that FAS consulted with, FAS received the following comment:

Comments: One respondent noted the numbers submitted reflected hours spent by headquarters staff on the designated activities

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

We do not provide payments or gifts to respondents other than for funding expenses directly related to food aid program implementation. These expenses could be associated with the transportation, storage, handling, and distribution of procured commodities and/or the administration and monitoring of programs.

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

There is no assurance of confidentiality provided to respondents in relation to this information collection. However, it is agency policy to keep confidential any information provided under this collection unless its release is required under a Freedom of Information Act request.

**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 associated with this information collection.

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

The current table (see attachment titled 2020 Burden Recordkeeping Hours.xlsx) reflects the average hour burden of three unique respondents who have applied for and received funding for the Local and Regional Procurement program.

- **Indicate the number of respondents, the frequency of response, annual hour**

**burden, and an explanation of how the burden was estimated.**

Approximately four different respondents are impacted annually by this information collection. Respondents can be divided into three general constituencies: Private voluntary organizations, cooperatives, and intergovernmental organizations. There are 11 collection activities associated with this information collection. Chart A (attached; see 2020 Burden Recordkeeping Hours.xlsx) provides burden information for each information collection activity under food assistance programs. Estimates were obtained by using agency data and through consultation with food aid constituents, as explained in question number 8.

**Grant Recipients**

Total annual information collection responses from grant recipients totaled 104, resulting in a total of 25,665 burden hours. (See rows 1-11 of Chart A for grant recipient burden hour calculations.)

*Methodology:* FAS records were used to calculate the number of grant applicant respondents and the number of annual responses per applicant for each required information collection. Several grant applicants were then surveyed to develop the initial estimated hours per response. This number was then multiplied by the number of total annual responses to calculate the total annual burden hours.

- **Provide estimates of annualized cost to respondents for the hour burdens of collections of information, identifying and using appropriate wage rate categories.**

The average annual salary, including fringe, for an employee of a grant recipient is estimated at about \$81,634. This average is for personnel who are regularly involved with the information collections. This estimate is derived on information from grant recipients' budgets and a comparable salary for a GS-11, Step 5 U.S. Government employee in Washington. The average salary is thus equivalent to about \$39 per hour. The total annual burden for grant recipients is 25,665 hours. Total annualized cost to grant recipients is therefore \$1,000,935 (25,665 hours x \$39/hour).

**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 items 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 is no additional cost to respondents or record keepers resulting from this information collection. All costs have been covered in questions 12 and 14.

**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.**

We estimate that the annualized cost of this information collection to the Federal Government is \$4,315,209, which consists of \$1,626,937 in labor costs, \$448,272 for the Food Aid Information System, and \$2,240,000 for FAS' portion of the Web-Based Supply Chain Management System. This information is captured in Table 1 below.

Additionally, Table 2 further breaks down the labor costs of the Federal Government. Table 2 uses the number of people, their grades, and the percent of time that they spend on information collection to calculate the total associated labor cost. (Note that salaries for all grade levels are assumed to be at the step 5 salary rate, and includes fringe benefits.)

**Table 1: Total Federal Government Costs**

Labor (See Table 2)	\$1,626,937
Computer Systems	\$2,688,272
<b>Total:</b>	<b>\$4,315,209</b>

**Table 2: Federal Government Labor Costs**

<i>Grade</i>	<i>Salary</i>	<i># People</i>	<i>Percent of Time</i>	<i>Total Cost</i>
GS-7	\$48,670	1	30%	\$14,601
GS-8	\$53,901	1	10%	\$5,390
GS-9	\$59,534	4	75%	\$178,602
GS-11	\$72,030	2	60%	\$86,436
GS-12	\$86,335	9	60%	\$466,208
GS-13	\$102,663	13	60%	\$800,718
GS-14	\$121,316	5	10%	\$60,658
GS-15	\$142,701	1	10%	\$14,270
			<b>Total:</b>	<b>\$1,626,937</b>

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

Initial burden hours provided were estimates compiled prior to the commencement of the program in 2016. Estimated burden hours have been revised upwards to reflect new data provided by private voluntary organizations currently implementing projects under the program.

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

There are no plans to publish data from this information collection.

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

We are not seeking approval to not display the expiration date for OMB approval of the information collection.

**18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”**

There are no exceptions.