

2020 SUPPORTING STATEMENT

**Office of Partnerships and Public Engagement
Centers of Community Prosperity
OMB # 0503 - _____**

Terms of Clearance:

A. Justification

- 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.**

Ans. The Office of Partnerships and Public Engagement (previously known as the Office of Advocacy and Outreach) was established pursuant to section 226B of the Department of Agriculture Reorganization Act of 1994 (7 U.S.C. 6934), as added by section 14013 of the Food, Conservation, and Energy Act of 2008, Public Law 110-246. The OPPE was established to improve access to USDA programs and services by small farms and ranches, beginning farmers and ranchers, and socially disadvantaged farmers and ranchers. Delegations from the Assistant Secretary of Administration to the Director, OPPE are reflected in 7 CFR 2.94 and include certain outreach functions previously carried out by other elements within USDA.

The Communities of Faith and Opportunity initiative seeks to better understand the challenges facing rural and underserved communities across the country, while also providing outreach and assistance to build the local capacity needed to address community challenges. Communities are invited to participate in outreach summits, capacity building workshops, as well as provide additional information to become a Community of Faith and Opportunity. The Communities of Faith and Opportunity effort is designed to provide the member communities with resources and increased opportunities to participate in USDA and other federal agency programs to address their needs. To manage the membership process, the Office of Partnerships and Public Engagement has developed an administrative process to track official requests; monitor the initiatives performance; and evaluate the public's response to the Department's efforts.

- 2. Indicate how, by whom, how frequently, 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.**

Respondents will be required to submit a mailing address, telephone, and email address for themselves, the name and email address for any partners and/or potential stakeholders. They will also be required to identify at least 5 community challenges or projects in which they wish USDA assistance to address. Submitted information on the questionnaire will be used by USDA agencies, grant recipients and Land Grant University Extension Staff on an as needs basis to provide technical assistance, services and recommendations to communities to address the self-identified challenges and community projects on an as

needs basis. The information will also be used by the Office of Partnerships and Public Engagement to evaluate the effectiveness and efficiency of the initiative

- 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.**

Information technology is central to this collection. The requested information will be collected using an online format, primarily through software called Qualtrics. This software application as the primary collection source will reduce the burden of completing and submitting the information by 20% in addition to reducing the burden on the Office of Partnerships and Public Engagement staff for records management; PII protection and paperwork reduction; thereby increasing the timeliness and administrative efficiency of the operation. Submissions will also be accepted at partnerships@usda.gov. Due to the current COVID-19 pandemic, paper submissions are not being accepted. If an applicant is unable to complete the form due to disability, they can contact 202-802-0476 to by phone to dictate the information.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

The Office of Partnerships and Public Engagement is the USDA Outreach Coordination Staff Office. As such, all efforts in this initiative are being coordinated across the department to leverage existing efforts, research and data. This coordinated effort will maximize the technical assistance and program delivery to rural and underserved communities. Modification of any current information will not be necessary as this information is unique to the Office of Partnerships and Public Engagement. The Staff Office will become the central repository for all information, research and data associated with this effort.

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

Of the 200 respondents anticipated to answer to the survey, we anticipate no more than 10 small businesses or other small entities will request participation. We anticipate no impact.

- 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.**

If the information collection does not occur or occurs less frequently this will have a negative impact in the department's efforts to provide technical assistance and outreach support to rural and underserved communities. USDA is committed to following data driven program delivery in communities across the country, and this information, combined with other activities in the program to provide robust and timely customer

service, and offering capacity building workshops, is critical to accomplishing the department's mission.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- **requiring respondents to report information to the agency more often than quarterly;**
 - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - **requiring respondents to submit more than an original and two copies of any document;**
 - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
 - **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances.

8. **If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, 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.**

The Office of Partnerships and Public Engagement sent a Federal Register notice forward; which was published on March 6, 2020, in Volume Number: Vol. 85, No. 45 on pgs. 13129-13130.

The Office of Partnerships and Public Engagement received one email comment from Jean Q. Pubic objecting to what was termed as the failure to maintain the separation of church and state; as well as the use of public funds on religious organizations. The Program Lead responded to the comment via email (see attached) thanking the correspondent for their comments and assuring them of the Department's efforts to remain inclusive in all endeavors.

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 form, and on the data elements to be recorded, disclosed, or reported.

Significant efforts were made to engage subject matter experts from across our customer base to review the Communities of Faith and Opportunity technical process, data collection design, in addition to the burden of submitting responses. OPPE consulted with the individuals identified below from outside of the agency:

Diego DaSilva, dsilva@buckner.org, 956-222-0450
Charles Sanders, sanderschip75@gmail.com, 573-552-1109
Mike Malkemes, malkemes@generationone.net, 281-627-1837

Interviews were conducted with each person and feedback was gathered concerning the process for submitting the form, including how much time and effort was taken to gather the required information and complete the submission process in accordance with the instructions provided. The agency received valuable feedback and comments resulting in a revision of the survey instrument.

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

No payments or gifts will be provided to respondents.

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

The respondents will receive as noted on the form an assurance of the protection and confidentiality as outlined in the Privacy Act, the Freedom of Information Act and the Confidential Information Provisions of Title V, Subtitle A, Public Law 107–347 and other applicable Federal laws. Respondents will be informed that their responses will be kept confidential and not disclosed in identifiable form to anyone other than USDA employees or its agents. Included in the notification will be the assurance that the information provided will be used for registration, response and research purposes only.

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 be asked of the respondents.

12. Provide estimates of the hour burden of the collection of information. The statement should (This is a two-part question and both parts must be addressed.):

A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

Type of Establishment	Number of Respondents	Number of Responses per Respondent	Total Annual Responses (C x B)	Time for Response in Minutes	Total Annual Time in Hours
Non-profits and small businesses	200	1	200	45	150

The estimate of the burden for completion of the survey was based on the results of a small size beta testing sample

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

Wage Category	Number of Respondents	hourly wage	Total Annual Burden Costs (including fringe benefits)
Non-profits and small businesses	200	34.72	\$5,208

The estimate of annualized cost to respondents is a theoretical cost accounting for the idea that the respondent's time spent complying with the information collection request is worth something - i.e., time is money. The total burden hours should be multiplied against an average hourly wage rate for the respondent universe. Minimum wage may be used, but only if that wage is reasonable for the class of respondent affected. An explanation of the wage rate used should be provided and the source, if applicable, cited. If multiple respondent groups exist, then the burden hours for each group should be factored against an appropriate hourly wage rate and summed.

Professional nonprofit managements have been deemed as an appropriate wage category and rate for these respondents. This amount of burden hours equal 150 hours total for all 200 respondents. 150 burden hours multiplied by the selected hourly wage of \$34.72, totals \$5,208.

Wage rate source: Department of Labor,
<https://www.bls.gov/news.release/pdf/ecec.pdf>

- 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 capital or start-up cost associated with this collection.

- 14. Provide estimates of annualized cost to the Federal government. Also, 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.**

Annualized cost to the Federal government is \$5,590. The method used to calculate cost is the hourly wage of a GS12 Step 2 employee and the time (hours) used to manage data collection, analyze the data and maintain the system.

\$42.89/hour (rounding up to \$43), 2.5 hours a week, 130 hours per year, for maintenance and operations for a total of: \$5,590; to include the recordkeeping requirement of 1 hour per month. The fringe rate for this employee is estimated at \$13 /hour, or \$1,000 total, for a total of \$5,590 per year.

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

This a new collection of information resulting in a program change of 150 burden hours.

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

This information will not be published directly but may be utilized to inform a variety of projects include one led by the Federal Reserve Board of Governors. Descriptive statistics would be undertaken on the *Communities of Faith and Opportunity – Next Steps* submission data as well as on registration data from OPPE managed outreach summits. Again, no more than descriptive statistics will be generated, all responses anonymized, and information only share with strategic partners with approval from the Director of OPPE, and only if it serves the interest of rural and underserved stakeholders.

- 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.**

The OPPE is not seeking approval to not display the OMB expiration date

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

"The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I."