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TO: Elyse Greenwald  
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Office of Management and Budget

THROUGH: Ruth Brown  
Departmental Clearance Officer  
Office of the Chief Information Officer

FROM: Bruce Summers  
Administrator  
Agricultural Marketing Service

SUBJECT: Request for Emergency Review and Approval for a New Information Collection Request

We are requesting emergency review and approval of an information collection package for a new grant program authorized by section 4206 of the Agriculture Improvement Act of 2018 (Pub. L. 115-334) (Farm Bill): the Micro-Grants for Food Security (MGFS) Program (7 U.S.C. 7518). A burden is being imposed on eligible State departments of agriculture for the collection of reporting requirements. The emergency review is requested because the collection of information is essential to the mission of the agency, and there are significant implications to consider related to this program and its benefit to those affected by the unanticipated *Novel coronavirus* (COVID-19).

The 2018 Farm Bill authorized the appropriation of \$10 million in fiscal year 2019 and each year thereafter. It directs “eligible states” to develop appropriate grant applications and the U.S. Department of Agriculture (USDA) to adequately evaluate these new proposals and obligate the funds. The following states and territories are “eligible States” as defined in the legislation: Alaska, Hawaii, American Samoa, the Commonwealth of the Northern Mariana Islands, the Commonwealth of Puerto Rico, the Federated States of Micronesia, Guam, the Republic of the Marshall Islands, the Republic of Palau, and the United States Virgin Islands.

In January 2020, USDA determined that the MGFS Program would reside in the Agricultural Marketing Service (AMS). Upon receiving this information, AMS expediently worked to develop the documents required for the grant application process. To assist grant recipients as soon as possible, AMS set a goal of awarding the funds within the calendar year 2020 growing season, which varies greatly among the eligible grant recipients (i.e. Alaska’s shorter summer season versus the consistently warmer island states and territories). For AMS’ purposes, we are targeting the end of the fiscal year (September 30, 2020) as the final date of the growing season. To meet that target, the grant application can go out no later than 30 days in advance. This emergency will provide some flexibility in that timeline.

In April 2020, AMS confirmed that \$5 million of the authorized \$10 million had been appropriated for fiscal year 2020. Additionally, AMS received confirmation in April 2020 from USDA’s Office of the Chief Financial Officer that the Catalog of Federal Domestic Assistance (CFDA) number, required of any Federal funding opportunity, had been assigned. Once AMS received both the CFDA number and funding appropriation, AMS was able to immediately

finalize and collate the documents to complete the full information collection package for the Office of Management and Budget's (OMB) emergency review and approval by May 18, 2020.

We request emergency approval of the information collection by July 15, 2020, to meet AMS' goal to award the \$5 million in MGFS Program funding by the end of the 2020 growing season. Eligible states are required to follow new application procedures and to submit a plan for a competitive grant process, as well as conduct outreach to communities or regions in that eligible state with the highest degree of food insecurity. AMS will publish the Request for Applications that establishes application requirements, the review and approval process, and grant administration procedures. The MGFS Program is executed in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200).

In addition to being critical to the Agency's [mission](#), the MGFS Program will specifically assist with COVID-19 response. OMB recently recognized the importance of prioritizing Federal efforts to respond to COVID-19 by directing "all Federal departments and agencies to marshal all legally available federal resources to combat the crisis," including issuance of two recent memos ([M-20-17](#) and [M-20-20](#)). This important program directly relates to the eligible State's ability to respond to food security issues, which have been exacerbated by the COVID-19 pandemic.

The States eligible for this grant import a significant amount of their food, resulting in high prices, especially in rural areas. This puts their citizens at risk when food supply systems break down, as has occurred during the COVID-19 pandemic. This specific program focuses on individuals, tribes, communities, or nonprofits that wish to grow their own food, and the streamlined application process reduces barriers that exist with other funding mechanisms. Funds may be used for the purchase of tools, soil, seeds, plants, grow towers, composting units, hydroponic and aeroponic gardening systems, and other necessities for growing and preserving food. The funds can also be used to expand areas under cultivation and extend the growing season to build or repair fencing for livestock, including reindeer, to participate in agricultural education, to create or expand sale of locally grown crops and meats, and to engage in other activities to increase food security.

The MGFS Program has received significant Congressional interest in expediting the awarded funds, as this program can directly benefit those affected by disrupted food supply chains. Those interested in the program may experience additional application burden should the MGFS Program implementation be further delayed (i.e. limited time for sub-recipients to use the funding for the 2020 growing season, short application turnaround time for eligible applicants and sub-recipients, continued COVID-19-related business hardships, etc.).

In compliance with the Office of Management and Budget's (OMB) regulations (5 C.F.R. Part 1320) which implement the Paperwork Reduction Act of 1995 (Pub. L. 104-13), the information collection and recordkeeping requirements that may be imposed by this action are submitted to OMB for emergency review and approval. The additional reporting requirements would not become effective prior to OMB review. Once approved the collection will be merged with 0581-0240.

Attached are the OMB 83-I, the Supporting Statement, AMS-71 spreadsheet, and Congressional Letter.