

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

Child Nutrition Non-Competitive Technology Innovation Grant

Grants and Fiscal Policy Division

Food and Nutrition Service

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Appendix A: Child Nutrition Program’s Non-Competitive Technology Innovation Grant Burden Table

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| | |
|-----|---------|
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| D-1 | SF-424B |
| D-2 | SF-424C |
| D-3 | SF-424D |
| D-4 | SF-425 |
| D-5 | SF-LLL |
| D-6 | AD-1047 |
| D-7 | AD-1048 |
| D-8 | AD-1049 |
| D-9 | FNS-908 |

D-10 SF-424

A1. 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.

Pursuant to the authorization in Division B, Title IV of the Further Consolidated Appropriations Act, 2020 (Public Law 116-94) and Consolidated Appropriations Act, 2021 (Public Law 116-260), Food and Nutrition Service (FNS) received \$25 million in each fiscal years (FYs) 2020 and 2021 (totally \$50 million available in FY 2021) in State funding for the purpose of developing, improving, and maintaining automated information technology systems use to operate and manage all Child Nutrition (CN) Programs (i.e., School Meal Programs, Summer Food Service Program and Child and Adult Care Food Program). These authorities allows FNS to offer eligible States a Non-competitive Technology Innovation Grant (nTIG) to replace the competitive CN Technology Innovation Grant (OMB Control #0584-0512) previously administered by FNS in fiscal years (FYs) 2017 and 2019.

Funding for CN's nTIG will be offered by FNS to all eligible States and territories in an equal distribution based on available funds for FYs 2020 and 2021. In FY 2021, 54 States and territories (69 State agencies) are administering the CN Programs and therefore eligible to receive this funding. Each State will be offered approximately \$925,926 for the purposes described above. In States where more than one (1) eligible agency administers the CN Programs, the funding will be divided among those agencies based on the same distribution percentages used in the State Administrative Expense funding formula, as described in Section 7 of the Child Nutrition Act and per Title 7, Part 235 of the Code of Federal Regulations.

A2. Purpose and Use of the Information.

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

Eligible States accepting the nTIG funding will be required to submit an application package to FNS, via www.grants.gov. This grant announcement, as with the other discretionary grant announcements included in the currently approved package (0584-0512), include a number of information collections, including a “project description” (program narrative), budget information (SF-424 series), disclosure of lobbying activities certification (SF-LLL), AD Forms 1047 through 1049 certifications, and the Grant Program Accounting System and Financial Capability Questionnaire forms are pre-approved by the Office of Management and Budget for the competitive grant process. They are not currently approved for the non-competitive grant process. Therefore, this Emergency ICR addresses this summer’s cycle only of the non-competitive grant process. In preparation for future cycles involving the non-competitive grants process, the FNS grants program will update and renew their applicable ICRs to reflect both the competitive and non-competitive grants process.

The aforementioned information is needed to evaluate and protect the integrity of the grantee selection process. States will have three (3) years to expend the awarded funds and be required to submit bi-annual progress reports and quarterly financial reports to FNS. Final Progress and Financial Status reports will be due 120 days after the termination date of the project.

Current OMB Control numbers for the aforementioned required forms include those listed below. This Emergency ICR reflects the burden for those forms as it relates to the non-competitive grants process:

| | | | |
|---------|-----------|---------|-----------|
| SF-424 | 4040-0004 | FNS-908 | 0584-0512 |
| SF-424A | 4040-0006 | SF-LLL | 4040-0013 |
| SF-424B | 4040-0007 | AD-1047 | 0505-0027 |
| SF-424C | 4040-0008 | AD-1048 | 0505-0027 |
| SF-424D | 4040-0009 | AD-1049 | 0505-0027 |
| SF-425 | 4040-0014 | | |

A3. Use of information technology and burden reduction.

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.

In compliance with the E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the www.grants.gov website. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

A4. Efforts to identify duplication.

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 Question 2.

The application is unique and program specific. There is no similar data collection effort available.

A5. Impacts on small businesses or other small entities.

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

Information being requested or required has been held to the minimum required for the intended

use. State agencies are not considered small entities as state populations exceed the 50,000 threshold for a small government jurisdiction; therefore, they do not meet the definition of “small entity” in the Regulatory Flexibility Act. None of respondents are small entities.

A6. Consequences of collecting the information less frequently.

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 is a voluntary data collection. If the information is not collected, FNS will not have adequate data to award the appropriate grantee or monitor financial reporting requirements. FNS will seek minimal information that will be critical to award all eligible applicants. Reduced frequency is not possible as this is currently a onetime application coinciding with the appropriation of funds.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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 other special circumstances that require the collection to be conducted in the manner stated above.

A8. Comments to the Federal Register Notice and efforts for consultation.

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 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 years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As in the competitive CN TIG (OMB Control #0584-0512), FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings, including the nTIG. As this is an emergency clearance request and all State partners are operating at maximum capacity on COVID-19 related matters, FNS has not consulted on this information collection or associated burden estimates. Should an ongoing information collection be needed following the expiration of this emergency ICR, FNS commits to consulting on those prior to submitting the full information collection.

A9. Explain any decisions to provide any payment or gift to respondents.

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

No payments or gifts are provided to respondents under this collection.

A10. Assurances of confidentiality provided to respondents.

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

The Department complies with the Privacy Act of 1974. No confidential information is associated with this information collection. This collection does not request any personally identifiable information, nor does it contain any forms that require a Privacy Act Statement.

A11. Justification for any questions of a sensitive nature.

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 included in the uniform grant application package for discretionary grant programs.

A12. Estimates of the hour burden of the collection of information.

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.

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.

The competitive grant process is currently approved under OMB Control #0584-0512. The non-

competitive grant process is not incorporated in this collection. This emergency ICR requests approval to use a non-competitive grant process. FNS expects 60 of the 69 eligible State agencies will choose to participate in the CN nTIG. Eligible States agencies accepting the nTIG funding will be required to submit an application package to FNS, via www.grants.gov. This grant announcement, as with the other discretionary grant announcements included in the currently approved package (#0584-0512), include a number of information collections, including a “project description” (program narrative), budget information (SF-424 series), disclosure of lobbying activities certification (SF-LLL), AD Forms 1047 through 1049 certifications, and the Grant Program Accounting System and Financial Capability Questionnaire. The table below demonstrates the estimated frequency and burden associated with activities associated with submitting information associated with this grant opportunity to FNS.

The total requested burden hours for this collection is 1,508. See table below for calculations.

| Respondent Category | Instruments | Form | Number of respondents | Frequency of response | Total Annual responses | Hours per response | Annual burden (hours) |
|---------------------|--|-----------------------|-----------------------|-----------------------|------------------------|--------------------|-----------------------|
| State Agency | State Agency project narrative via application on Grants.gov | Announcement Letter | 60 | 1 | 60 | .33 | 19.8 |
| | | Narrative Application | 60 | 1 | 60 | 7.67 | 460.2 |

| | | | | | | | |
|--|--|---------|----|---|----|------|-------|
| | | | | | | 1.1 | 66.0 |
| | | SF-424 | 60 | 1 | 60 | | |
| | | | | | | 1.8 | 108.0 |
| | | SF-424A | 60 | 1 | 60 | | |
| | | | | | | 0.81 | 48.6 |
| | | SF-424B | 60 | 1 | 60 | | |
| | | | | | | 2 | 120.0 |
| | | SF-424C | 60 | 1 | 60 | | |
| | | | | | | 0.5 | 30.0 |
| | | SF-424D | 60 | 1 | 60 | | |
| | | | | | | 0.17 | 10.2 |
| | | SF-LLL | 60 | 1 | 60 | | |
| | | | | | | 0.25 | 15.0 |
| | | AD-1047 | 60 | 1 | 60 | | |
| | | | | | | 0.25 | 15.0 |
| | | AD-1048 | 60 | 1 | 60 | | |

| | | | | | |
|--------------------|-----------|-------------|-------------|-------------|--------------|
| | | | | 0.25 | 15.0 |
| AD-1049 | 60 | 1 | 60 | | |
| FNS-908 | 60 | 2 | 120 | 3 | 360.0 |
| SF-425 | 60 | 4 | 240 | 1 | 240.0 |
| Grant Total | 60 | 17.0 | 1020 | 19.1 | 1,508 |

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

State agency staff will be providing the responses. Standard wage rate categories used in determining annualized burden costs were based on the most recent U.S. Department of Labor, Bureau of Labor Statistics (BLS) Occupational Employment and Wages Statistics data from May 2019, using the corresponding occupation code 11-9039, Education Administrators, All Other¹. According to the most recent BLS data, workers in this occupation earn a mean wage rate of \$44.30 per hour. When this wage is fully loaded (wage + wage*.33) States would incur an annualized administrative cost of \$58.92 per hour burden in the information collection. \$58.92 * 1,508 burden hours for the 60 respondents equals \$88,838.07 aggregated cost.

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in

¹<https://www.bls.gov/oes/current/oes119039.htm>

questions 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.

FNS does not expect any additional annual cost burden to respondents or recordkeepers.

A14. Provide estimates of annualized cost to the Federal government.

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.

The Federal cost assumes it will take Regional or National Office staff (GS-13 Step 1) approximately 5 hours to review and approve each State agency opt-in application and implementation plan.

This includes Federal worker time at FNS for the following:

| | Hours | Hourly Wage Rate* | Total |
|--|--------------|--------------------------|--------------------|
| GS-13/1 Program Analyst | 300 | \$49.19 | \$14,757 |
| + 33% for Staff Fringe Benefits | | | \$4,869.81 |
| Total Federal Cost | | | \$19,626.81 |

*Wage rates determined in accordance with the Office of Personnel Management salaries and wages information (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx)

A15. Explanation of program changes or adjustments.

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

This submission is a new information collection request as a result of program changes and will

add 1,508 hours of burden to OMB's inventory.

A16. Plans for tabulation, and publication and project time schedule.

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

Information in the grant applications will not be published. Disclosure of information contained in the grant application package is subject to the Freedom of Information Act and The Privacy Act, www.fns.usda.gov/privacy-policy. FNS will publicize summary information of the applicants that receive funding on the FNS website.

A17. Displaying the OMB Approval Expiration Date.

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 agency plans to display OMB control number and the expiration date on all instruments.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

FNS does not have any exceptions to the certification statement.