

**2021 Supporting Statement**  
**Form FS-1500-100, “GRANT OR AGREEMENT AWARD FACE SHEET”**

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## **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.**

The Forest Service new form, FS-1500-100, proposed for approval for emergency use is necessary to the Agency’s Non-Federal Financial Assistance program. Authorities and Statutes with description related to this collection can be found under the supplementary documents.

To streamline the Grants and Agreements (G&A) process, the G&A policy development team created a single face sheet form with the goal to create a single form that initiates the documentation for most Forest Service grants and agreements. Accompanying this face sheet would be an attachment with standard and static terms and conditions that would not be fillable and would be in PDF format to adhere to 508 compliance requirements. In addition to the benefits of accessibility, this form streamlines the process of documenting G&A transactions for Program Managers and outside cooperators.

This is especially critical for tribal partners, which is why emergency use approval is requested. New authority included in the 2018 Farm Bill expanded the ability of the agency and tribes to enter into agreements pursuant to the Tribal Forest Protection Act, and the new form specifically addresses tribal partners. This form has been pilot tested on three projects executed under the new authority for significant projects in the National Forest. With a number of additional tribal projects currently in development, the Forest Service is fast approaching our pilot phase limit of ten transactions on this form ahead of final approval.

We believe this new form will create significant efficiencies for our partners, program managers, grants specialists, and in the Policy Office. The new form will create a more consistent agreement process where the Forest Service agreements will be more in line with other USDA agencies. The design and process for the new form was modeled after NRCS, APHIS, and ARS agreement forms and procedures. By creating a more universally recognizable and accessible form, outside cooperators benefit immensely in efficiency gained and consistency across the agency.

If approved for emergency use, this form will be integrated into the approved collection, 0596-0217, upon its renewal. This collection is currently in review and expires 12/31/2021.

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- 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.**

The Forest Service seeks approval for a new information collection related to execution of grants and agreements. This face sheet, in particular, is needed for the agency and tribal partners to implement recently enacted authority to enter into agreements pursuant to the Tribal Forest Protection Act.

- a. What information will be collected reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

The Information collected from cooperators includes:

- Contact information;
- Employer ID Numbers (EINs), Taxpayer Identification Numbers (TIN), Data Universal Numbering System (DUNS), & System of Award Management (SAM) registration verification;
- Project description or statement of work, such as activities to be performed, expected outcomes, monitoring activities, or work products;
- Financial plans (such as contribution types and amounts, Electronic Fund Transfer (EFT) and billing information, list of contractors/sub recipients);
- Performance and Financial Reports; and
- Other related administrative information.

- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Emergency use of the new form accommodates tribal partners. Existing forms are focused on specific programs, and no form exists that accommodates the authority to implement projects under the Tribal Forest Protection Act, and since that authority was provided in the 2018 Farm Bill, a change in the forms collection was needed.

When permanent, information is collected from non-profits and for-profit organizations; institutions of higher education; Federal, state, local, and Native American Tribal governments; individuals; foreign governments and organizations. Statutory authority authorizing the agreement program outlines which type of organization may participate in the agreement program.

- c. What will this information be used for, provide ALL uses?**

The information will be used to develop, implement, and administer Forest Service's Non-Federal Financial Assistance program awards.

- d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the telephone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

The form is part of executing an agreement and is to be signed by the

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appropriate representative of the Forest Service and the partner. As such, completing the form is the only option for collecting the information. It is used when Forest Service and Cooperator share mutual interests and benefit in the same qualitative way from the objective of the agreement. Form collects a set of standardized data that ensure consistency and facilitate our ability to report outward facing agreements to the public in keeping with protocols outlined in the DATA Act.

*Statutory Authority:* The potential authorities that would authorize programming to be documented on the face sheet form include Interior and Related Agencies Appropriations Act of 1992, Pub.L. 102-154 and, Secure Rural Schools (SRS) and Community Self-Determination Act, P.L. 106-393, (when obligating SRS funds), the National Agricultural Research, Extension, and Teaching Act of 1977. 7 USC 3318, 3319, Cooperative Funds and Deposits Act of 1978, Public Law 94-148 as amended. 16 USC 565a-1; Watershed Restoration and Enhancement Act of 1998 (Wyden), Public Law 105-277 as amended, 16 USC 1011a; Secure Rural Schools and Community Self-Determination Act, Public Law 106-393 §601 (a) as amended. 16 USC 500. If sub projects may collect funds: Cooperative Funds Act of June 30, 1914 (16 U.S.C. 498) as amended by P.L. 104-127; and Granger- Thye Act of 1950, Public Law 81-478, as amended. 16 USC 572, Federal Technology Transfer Act of 1986. 15 USC 3710.

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FORM NO.	FORM TITLE	PURPOSE	AUTHORITY
FS-1500-100	Challenge Cost-Share Agreement, Cost-Reimbursable Agreement; Cooperative Research and Development Agreement; Joint Venture Agreement, Memorandum of Understanding; Participating Agreement	Instrument used when Forest Service and Cooperator share mutual interests and benefit in the same qualitative way from the objective of the agreement.	1. Interior and Related Agencies Appropriations Act of 1992, (Pub. L. 102-154) and as amended. 2. Secure Rural Schools and Community Self-Determination Act of 2000, Public Law 106-393, 16 U.S.C. 500, as reauthorized and amended. National Agricultural Research, Extension, and Teaching Policy Act of 1977, (Pub. L. 95-113), as amended by the Food Security Act of 1985, (7 U.S.C. 3318, and 3319, Pub. L. 99-198) and further amended by Public Law 105-198. Federal Technology Transfer Act of 1986 (15 U.S.C. § 3710a). 1. Cooperative Funds and Deposits Act of December 12, 1975, Pub.L. 94-148, 16 U.S.C. 565a1 - a3, as amended. 2. Wyden Amendment (Public Law 105-277, Section 323 as amended by Public Law 109-54, Section 434, and permanently authorized by Public Law 111-11, Section 3001). 3. Secure Rural Schools and Community Self-Determination Act of 2000, Public Law 106-393, 16 U.S.C. 500, as reauthorized and amended.

**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.**

Cooperators seeking to partner with the Forest Service may complete the data requested on the face sheet form by either: handwritten or manually typed documentation submitted via any mail delivery service; electronic documentation submitted via internet, including emails; by electronic submission via fax; by voice over telephonic device, such as a telephone or voice over internet provider, or in person discussions with the Forest Service; or any other commonly used means of communication available to both parties. Forms may be located at a National

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office, region, research and development station, laboratory, Area, unit, or Job Corps website.

The decision to use a specific means of data collection for form completion is based on the availability of technology and informal agreement of both parties; as agreed upon in any signed agreement by both parties; and/or as specifically provided by written, procedural rules made publicly available by the Forest Service unit to the Respondent. Use of modern information technology to reduce burden is encouraged by both parties, whenever possible. The new form is scheduled to be automatically created within our G&A system using information collected from other systems such as SAM and FMFI systems.

**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.**

When integrated into 0596-0217, the new form FS 1500-100 will replace many of our high use FS form templates: FS-1500-10, 10A-10C; FS-1500-12; FS-1500-13, 13A and 13B; FS1500-14 and 14A; FS-1500-16, 16A - 16E.

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

The new FS 1500-100 form facilitates access to resources for tribal partners.

Over time, having a single form that replaces numerous other forms will lessen the burden further on small businesses, Tribal entities, NGOs and small municipalities in underserved areas by utilizing data already collected from the SAM database.

**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.**

Without approval for emergency use of FS1500-100, the agency will not have the ability to implement more than 9 projects under the new Tribal Forest Protection Act authority.

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

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **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**

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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.**
- 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 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.**

The Federal Register 60-day Notice for the renewal of information collection 0596-0217 was published on September 14, 2020, Vol. 85, No. 178, 194 pages 56575-56576. The Forest Service did not receive any comments. The new form FS1500-100 was included in that Federal Register notice.

**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 record keeping, 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.**

Name: Jeri Lou Zimmerman

Title: Senior Grants and Contracts Administrator

Office/Work Address: Office of Sponsored Programs Administration, University of Missouri-Columbia, 115 Business Loop 70 West, Mizzou North, Room 501

Phone Number (office and mobile): 573/882-9587 (office); 573/338-2006 (mobile)

Office/Work Email address: [zimmermanje@missouri.edu](mailto:zimmermanje@missouri.edu)

Name: Benjamin Kalan

Title: Assistant Manager

Office/Work Address: 666 K St, NW STE 1250 Washington, DC 20006

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Phone Number (office and mobile): 609-651-9080  
Office/Work Email address: [bkalan@jeffersonconsulting.com](mailto:bkalan@jeffersonconsulting.com)

Name: Jody Olson  
Title: Senior Director, Federal Affairs  
Office/Work Address: 1133 15<sup>th</sup> St, NW, Suite 1000, Washington, DC 20005  
Phone Number (office and mobile): (o) 202-595-2481; (c) 703-338-3489  
Office/Work Email address: [Jody.Olson@nfwf.org](mailto:Jody.Olson@nfwf.org)

**Other Commination:** Forest Service maintains close contact with recipients and partners throughout the execution of the award or agreement. Both program personal and Grants and Agreement specialists place emphasis on fulfilling of project objectives and that the cooperators understand and follow the appropriate guidelines and regulations. Furthermore recipients and partners are encouraged to work with the Forest Service in pre-award, during the award, and at close-out to ensure the project is performed successfully. This communication leads to new policies and procedures which improves communication and decreases the burden on the cooperator.

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

No financial incentive, payment or gift, will be used to garner responses.

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

All assurances of confidentiality, found in agency related agreement provisions, are standardized and based on the Freedom of Information Act (5 U.S.C. § 552, as amended by Public Law No. 104-231, 110 Stat. 3048) and FSM 1580, et. al.

**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, such as those pertaining to sexual behavior, attitudes, religious beliefs, or other matters commonly considered private.

**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.**

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- **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.**
  - a) **Description of the collection activity**
  - b) **Corresponding form number (if applicable)**
  - c) **Number of respondents**
  - d) **Number of responses annually per respondent,**
  - e) **Total annual responses (columns c x d)**
  - f) **Estimated hours per response**
  - g) **Total annual burden hours (columns e x f) estimates for each form**

Table 1: Estimated Reporting

BURDEN ESTIMATE	NUMBER OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL NUMBER OF RESPONSES	AVERAGE HOURS PER RESPONSE*	TOTAL ANNUAL BURDEN HOURS
Completing Face Sheet as part of project agreement	50	1	50	1	50
<b>Totals:</b>	50	1	50	1	50

\*Includes development of statement of work, project narrative, certification documents, reviewing grant or agreement, and other documents necessary to accept and spend Federal funds.

- Record keeping burden should be addressed separately and should include columns for:
  - a) Description of record keeping activity:
  - b) Number of record keepers:
  - c) Annual hours per record keeper:
  - d) Total annual record keeping hours (columns b x c):

Table 2: Estimated Recording Keeping Activity

There is no additional record keeping activity related to use of FS 1500-100, since it is part of a larger application package that has recordkeeping requirements.

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

Table 3: Estimated Annualized Cost to Respondents

DESCRIPTION OF ACTIVITY	ESTIMATED TOTAL RESPONSES	ESTIMATED TOTAL ANNUAL BURDEN ON RESPONDENTS (HRS)	ESTIMATED AVERAGE INCOME PER HOUR*	ESTIMATED COST TO RESPONDENTS
<b>Private Sector:</b> Creating/developing,	50	50	\$40.53	\$2,026.50**



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maintaining/processing, reviewing, and closing-out physical/electronic file(s), including all related administrative actions associated with the project(s).				
<b>Totals:</b>	50	50	\$40.53	\$2,026.50

\* Department of Labor, *Occupational Employment, and Wages, May 2016* (Business Operations Specialist, mean hourly wage- \$40.53). Reference Link: <https://www.bls.gov/oes/current/oes131198.htm>.

\*\* Note that the estimated costs to the recipient are typically allowable cost to the grant or agreement authorized by the applicable cost principle and charged either as an indirect or a direct cost.

**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 startup or operational maintenance costs associated with this collection.

**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.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- Employee labor and materials for developing, printing, storing forms
- Employee labor and materials for developing computer systems, screens, or reports to support the collection
- Employee travel costs
- Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information
- Employee labor and materials for collecting the information
- Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information

Estimates of Annualized Cost to the Federal Government (2021 table)

Cost Category <sup>1</sup>	Estimated Costs	Methodology
Employee labor and	\$224	2 people x

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materials for developing, printing, storing forms		\$34.86/hr <sup>2</sup> x 3 hrs work/person x \$209.16 Sub total 1.07% <sup>3</sup> indirect rate= \$223.80
Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information (checking for accuracy and facilitating signature)	\$373	2 program managers/grants & agreements specialists reviewing applications x \$34.86/hr <sup>2</sup> x 5 hours/instrument = \$348.60 Subtotal. x 1.07% <sup>3</sup> burden rate= \$373 Total
<b>Totals:</b>	<b>\$597</b>	

<sup>1</sup> This amount covers the 90-day emergency use period

<sup>2</sup> GS-11, Step 1, average position, based on OPM 2021 GS Pay Scale of \$34.86/per hour ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf)).

<sup>3</sup> Forest Service national burden rate of 7% (2013).

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

Forest Service is requesting a total of 42,445 burden hours which hasn't changed from the previous OMB approval; although our Agency has combined and added forms.

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

Results of this information collection will not be published

**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.**

Paperwork Reduction Act, 44 USC 3512(a)(1), as implemented at 5 CFR 1320.6(a) (1) states that agency-specific forms must be approved by OMB and display the OMB control number to be binding on our partners. Since Forest Service specific agreements may last up to 5 years, and 10 years for Stewardship Agreements, the Forest Service requests that the expiration date not be included on OMB approved templates incorporated under this information collection. Our concern is that our partners may believe that the agreements are no longer binding upon the OMB expiration date. Alternatively, if the OMB expiration date must be included on all of the agency-specific agreements, we suggest that modifying all Agency-specific agreements with our partners upon renewal of this information collection may be excessively burdensome on our partners.

**18. Explain each exception to the certification statement identified in**

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**item 19, "Certification Requirement for Paperwork Reduction Act."**  
There are no exceptions to the certification statement.