

**United States Department of Agriculture
National Resource Conservation Program
Supporting Statement
Composting and Food Waste Reduction Cooperative Agreements
OMB Control Number: 0578-XXXX**

NRCS is submitting an emergency request for an OMB approval to cover the information collection request for the FY22 Composting and Food Waste Reduction (CFWR) Cooperative Agreements.

Justification

1. Explain the circumstances that make the collection of information necessary.

The Agriculture Improvement Act of 2018 (2018 Farm Bill; Pub L. 115-334) authorized the Farm Production and Conservation (FPAC) mission area and the Natural Resources Conservation Service (NRCS) to carry out pilot projects under which local and municipal governments enter into cooperative agreements to develop and test strategies for planning and implementing municipal composting plans and food waste reduction plans. In FY20 and FY21, the first two years of the program, 37 awards totaling just over \$3 million were made. To improve the ability of communities nationwide to implement projects that increase compost, improve soil quality, and reduce food waste, the CFWR program is substantially increasing its public investment via funding and awards in FY22, leveraging additional funding provided by the American Rescue Plan of 2021 (Pub L. 117-2). Although no new information is being collected beyond prior year requests, the office anticipates an additional public burden due to an increase in applications received and awards made.

2. Indicate how, by whom and for what purpose the information is to be used. Except for new collections, indicate the actual use the Agency has made of the information received from the current collection.

NRCS is using the information to determine whether participants meet the eligibility requirements to be a recipient of grant funds. Lack of adequate information to make the determination could result in the improper administration and appropriation of Federal grant funds.

The information collection requirements are described in the Reporting and Recordkeeping requirement.

Project Summary

NRCS requires applicants to provide descriptive narrative detailing the proposed project. Applicant input and summary information is used to evaluate proposals and to produce the Notification of Award. Estimated burden time: 10 hours per awardee.

Negotiated Indirect Cost Rate Agreement (NICRA)

All awardees requesting reimbursement of indirect costs, who have an existing NICRA, must provide this document with their application. Estimated burden time: 0.5 hour per awardee requesting indirect costs.

De Minimus Rate Agreement

NRCS requires all grant recipients requesting reimbursement of indirect costs, who do not have an existing NICRA, to provide an attestation that they will utilize the 10% De Minimus Rate when calculating indirect costs. Estimated burden time: 0.5 hour per awardee requesting indirect costs who does not have a NICRA.

Annual Progress Reports

NRCS requires all grant recipients to submit an annual report detailing progress, challenges, and key milestones. Estimated Burden time: 17 hours per awardee per response.

Notice of Award

NRCS requires all grants recipients to sign the Notice of Award. Estimated Burden Time: 0.5 hour per awardee.

Collections Approved under Other OMB Control Numbers

The following table summarizes the information collection for which approval has been obtained under the OMB Control Number for another CFR part.

Description	Approved Under
SF-424, Application for Federal Assistance	4040-0020
SF-424A, Budget Information Non-Construction	4040-0006
SF-425, Financial Status Report	4040-0014
SF-270, Request for Advance and Reimbursement	4040-0012
Certificate Regarding Lobbying	4040-0013
SF-LLL, Disclosure of Lobbying Activities	4040-0013

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 of the decisions for adopting this means of collection. Also describe any consideration of information technology to reduce burden.

CFWR cooperative agreements provide information using forms that are approved for government-wide use and available in electronic form on Grants.gov.

Non-form information collections are mostly limited to copies of documents in the CFWR grant activities' possession or providing written replies to agency requests or offers. Non-form collections, as well as all forms, may be submitted by email.

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

There is no duplication of information involved with collecting applications, processing applications, or monitoring of the CFWR projects. CFWR recipients provide information on a regular basis to NRCS to comply with reporting requirements.

5. Methods to minimize burden on small businesses or other small entities (Item 5 of the Reporting and Recordkeeping Requirements), describe any methods to minimize the burden.

It has been determined the collection will not have a significant economic impact on a substantial number of small entities since it contains normal business recordkeeping requirements and minimal essential reporting requirements.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The regulation requires the minimum information needed to determine whether CFWR program applicants are eligible for an award and to conduct adequate performance monitoring and reporting. This minimum reporting of information is necessary for the NRCS to administer the CFWR in an equitable and cost-effective manner.

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

- a) Requiring respondents to report information more frequently than quarterly. There are no information collection requirements that require information more frequently than quarterly.
- b) Requiring written responses in less than 30 days. There are no information collection requirements that require written responses in less than 30 days.
- c) Requiring more than an original and two copies. There are no information collection requirements that require more than an original or single copy of a document.
- d) Requiring respondents to retain records for more than 3 years. There are no such requirements.
- e) No utilizing statistical sampling. There are no such requirements.
- f) Requiring the use of statistical sampling which has not been reviewed and approved by OMB. There are no such requirements.
- g) Requiring the pledge of confidentiality. There are no such requirements.
- h) Requiring submission of proprietary trade secrets. There are no such requirements.

8. Describe efforts to consult with persons outside the Agency to obtain their view on availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on data elements to be recorded, disclosed, or reported.

NRCS will publish a Request for New Information Collection 60-day notice in the Federal Register.

NRCS will maintain close contact with grantee and provides guidance and advice on issues as they occur.

9. Explain any decision to provide any payment or gift to respondents.

There is no payment or gift was given to respondents.

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

There is no assurance of confidentiality provided to respondents for the information required in this collection. The information collected pertains mostly to administering federal grants according to rules and regulations.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The information collected under this docket is financial or programmatic in nature and is a required condition for the receipt of federal grant funds. Participants disclose financial information as well as information of their business operations. However, the information collected is required to properly administer federal funds. No information commonly considered sensitive or private is collected.

12. Provide estimates of the hour burden of the collection of information.

The estimate of hour burden of the information collection as provided in the Reporting and Recordkeeping Requirements spreadsheet, is as follows:

Total number of Unduplicated Respondents (This is the total number applicants)	350
Reports Filed Per Respondent (1 progress report, 1 financial report per awardee)	2
Total Annual Responses	2,089
Total Annual Burden Hours	5,535

Respondent cost per hour was derived by using U.S. Bureau of Labor Statistics Occupational Employment and Wages, May 2020, 11-9013 Farmers, Ranchers, and Other Agricultural Managers. The U.S. mean household income, as measured by the Bureau of Labor, is \$41.35.

Fringe benefits for all private industry workers are an additional 29.9 percent,¹ or \$12.36, resulting in a total of \$53.71 per hour. The estimated respondent cost is determined by multiplying the hourly rate by the hours per response identified in the Recording and Recordkeeping spreadsheet which equals \$ 2,927.20 (54.5 hours x \$53.71).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

The regulation and associated information collection place no burden costs on respondents for capital, start-up, operation, maintenance, or the purchase of services.

14. Provide estimates of annualized cost to the Federal Government.

NRCS employees supporting CFWR obtaining and report the information needed. Employees review the information provided to effectively administer federal grant funds according to applicable rates and regulations. It is estimated that employees spend 10 hours on information submitted from each CFWR applicant and an additional 10 hours on information submitted by each CFWR awardee.

National employee cost per response is equal to 10 minutes multiplied by \$44.10 (estimated national employee average hourly wage based on 2022 General Schedule, Grade 13, Step 5 base rate). Fringe benefits for all government workers are an additional 31 percent, or \$13.67, resulting in a total of \$57.77 per hour, or \$5.78 per response. The total annualized cost to the Federal Government is \$12,074.42 (\$5.78 x 2089 responses).

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

This is a new information collection.

16. For collection of information whose results will be published, outline plans for the tabulation and publication.

The information collections under this OMB control number may be published to public-facing USDA websites, including project information located at www.farmers.gov/urban, and/or included in routine Congressional reports.

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

Most of the information not collected through OMB forms is collected in narrative format, with formatting chosen at will by the applicant and/or awardee. Grants.gov displays the OMB

¹ U.S. Bureau of Labor Statistics. "Employer Costs for Employee Compensation." News release. March 19, 2020. <https://www.bls.gov/news.release/ecec.htm>.

expiration date on instruments used by multiple agencies that each obtains its own OMB approval in the Grants.gov.

18. Explain each exception statement to the certification statement.

There are no exceptions requested.