

**United States Department of Agriculture  
National Resource Conservation Program (NRCS)  
Supporting Statement  
Partnerships for Climate-Smart-Grant  
OMB Control Number: 0578-0031**

NRCS is requesting OMB approval on an extension and a revision of a currently approved information collection request associated with the Partnerships for Climate-Smart-Grant. This request aligns with the burden estimates specified in the published 60-day notice and is timed to continue the approval that was initially approved as an emergency to now move to a normal approval.

USDA has had strong interests in partnering with NRCS on the climate-smart initiative. NRCS is considering how the interest may impact the annual burden estimates going forward. NRCS will complete a Request for Approval under the “Generic Clearance for the Collection of Solution for Funding Opportunity Announcement” after USDA receives OMB approval on that request; if NRCS determines that any changes are required for the annual burden estimates, they will be addressed in that request for approval. Once the generic request is approved, the FPAC Business Center will request to discontinue this collection for NRCS.

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

USDA has directed the Farm Production and Conservation (FPAC) mission area and NRCS to implement Partnerships for Climate-Smart Commodities to support the production and marketing of climate-smart commodities through a set of pilot projects that provide voluntary incentives through partners to producers and landowners, including early adopters, to implement climate-smart production practices, activities, and systems on working lands; measure and quantify, monitor and verify the carbon and greenhouse gas (GHG) benefits associated with those practices; and develop markets and promote the resulting climate-smart commodities.

**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 uses the information to determine whether recipients meet the eligibility requirements to be a recipient of grant funds and to report on the progress related to the funding opportunity requirements. 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 below and on the attached Reporting and Recordkeeping Requirements.

Progress Reports

Progress reports will be required after the first quarter and at least biannually thereafter on the project, including the following components:

- Producers and landowners participating, and demonstration of equitable enrollment, including enrollment of underserved and small producers;
- Practices applied;
- Outreach and training;
- Financial assistance for producers or landowners to implement CSAF practices;
- Greenhouse gas and carbon sequestration benefits accrued and verified, and other ancillary environmental benefits associated with the production of climate smart commodities (including GHG quantification methodology); and
- Marketing and outreach related to climate-smart commodities as a result of project activities including information on impacts related to a variety of farm sizes and types;
- Technical assistance and resources provided, especially to help producers overcome barriers to adopting CSAF practices;
- Partnerships developed and leveraged including public-private partnerships to foster and develop CSAF market;
- Climate-smart commodity supply chain and demand impacts as well as other economic benefits; and
- Implementation of MMRV and supply chain traceability systems.

These progress reports and associated Partnerships Network meetings may also include collection of the following information:

- Lessons-learned as projects are implemented;
- Options and approaches for providing technical assistance to participating farmers, ranchers, and forest landowners;
- Collection of farm level data and procedures for measurement or quantification, monitoring, reporting, and verifying GHG benefits;
- Approaches and options for tracing climate-smart commodities through the supply chain;
- Mechanisms for reducing costs of implementation;
- Synthesis of outcomes and successes;
- Opportunities for USDA and others to inform future approaches to generating new and expanded markets for climate-smart commodities;
- Climate-smart commodity economics and program design;
- Evaluation of tools used in GHG quantification of on-farm and on-forest practices;
- Approaches to defining climate-smart commodities; and
- Approaches to GHG benefit accounting (for example, addressing additionality, leakage, permanence, durability, etc.).

**Notes:** Additional reporting and data sharing requirements may apply at time of award. Certain reporting elements will be required to be georeferenced. Financial reporting will also be required consistent with 2 CFR 200. Spot checks may be required upon review of reporting documents or other USDA analyses.

**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.

Description	Approved Under
SF-424, Application for Federal Assistance	4040-0004
SF-424A, Budget Information Non-Construction	4040-0006
SF-424B, Assurances Non-Construction	4040-0007
SF-425, Financial Status Report	4040-0014
SF-270, Request for Advance and Reimbursement	4040-0012

**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, for example, 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.**

Partnerships for Climate-Smart Commodities uses forms that are available on Grants.gov.

Non-form information collection is mostly limited to copies of documents in the Partnerships for Climate-Smart 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. Other forms of electronic or automated information collection may be used in the future.

**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 processing of grant request, the monitoring of the Partnerships for Climate-Smart Commodities’ grant request, or the monitoring of the Partnerships for Climate-Smart grant itself. Partnerships for Climate-Smart Commodities provide information on a regular basis to the agency to ensure that the program is still eligible to receive federal funds.

**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.**

There is no significant economic impact on a substantial number of small entities since it contains normal business recordkeeping requirements and minimal essential reporting requirements. We estimate at least 150 small entities.

**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 activity requires the minimum information needed to determine whether a Partnerships for Climate-Smart is eligible for application for Federal Assistance and reporting. This minimum reporting of information is necessary for NRCS to administer the Partnerships for Climate-Smart in an equitable and cost-effective manner.

If the information is not collected, NRCS will not be able to effectively manage the grant awards.

**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 propriety 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.**

The 60-day notice requesting for the public comment was published on February 22, 2022 (87 FR 11038-11039). We received 3 comments via Regulations.gov but the comments were not related to the collection.

USDA is conducting the Partnerships for Climate-Smart Commodities grant activity that involves gathering information from grantees to apply for and report on the award(s). We have consulted with three individuals who had no comments and did not want to share their name with the public.

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

There is no payment or gift 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 for the general administration of federal grants.

**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 in nature as a condition for the receipt of federal grant funds. Participants disclose financial information as well as information of their business operations. The information is required to properly administer federal funds.

**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	500.
Reports Filed Per Respondent	3.22.
Total Annual Responses	1,610.
Total Annual Burden Hours	14,370.

Respondent cost per hour was derived by using U.S. Bureau of Labor Statistics Occupational Employment and Wages, May 2021, 11-9013 Farmers, Ranchers, and Other Agricultural Managers. The hourly wage rate, as measured by the Bureau of Labor, is \$46.40. Fringe benefits for all private industry workers are an additional 29.9 percent,<sup>1</sup> or \$13.87, resulting in a total of \$60.27 per hour. The estimated respondent cost is \$866,080 (14,370 x \$60.27).

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

The 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.**

Agency employees provide guidance and assistance to Partnerships for Climate-Smart in obtaining and reporting the information needed. In addition, they provide templates for completion to ensure information provided is complete and accurate, and to reduce the time it takes Partnerships for Climate-Smart to gather and submit the requested information. Also, employees review the information provided to effectively administer federal grant funds according to applicable rates and regulations for the general administration of federal grants. It

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<sup>1</sup>

is an estimate that employees spend 54 hours on information submitted from each Partnerships for Climate-Smart.

USDA employee cost per response is equal 54 hours multiplied by \$62.34 (estimated National employee average hourly wage; based 2022 General Schedule, Grade 14, Step 6). Fringe benefits for all government workers are an additional 31 percent, or \$19.87 resulting in a total of \$81.21 per hour. The total annualized cost to the Federal Government is \$6,973,457 (\$81.21 x 54 hours x 1,610 responses).

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

NRCS estimated at least 500 recipients would apply, with a resulting 1,610 annual responses and 14,370 burden hours as stated in the published 60-day notice. This was resulted in more applications than anticipated and increased in estimated numbers, to better reflect the current expectations.

Specifically, as compared to the current burden approved under the emergency approval, the number of respondents increased by 445 while the annual responses increased by 1,500 in the request and the burden hours increased 12,500 burden hours.

As stated at the beginning of the supporting statement, NRCS is considering if any additional update is needed for the estimated numbers. NRCS will plan on completing Request for Approval under the “Generic Clearance for the Collection of Solution for Funding Opportunity Announcement” to absorb the burden hours under the USDA OMB control number. Once the generic request is approved, NRCS will request to discontinue this 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 tabulated or published as part of the Partnership Network established under this grant opportunity.

**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 collected is in narrative in the submitter’s own format – information collection is not using specific forms, so there is no place to include the OMB control number and expiration date.

The common forms, which are part of this information collection are available on grants.gov and display the OMB control number and expiration date, as required 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 identified in items 19 and 20 on OMB Reporting and Recordkeeping Requirements.** There are no exceptions requested.