

**SUPPORTING STATEMENT
for the
Agricultural Trade Promotion Program
(0551–0049)**

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 Agricultural Trade Promotion Program (ATP) is a cost–share program implemented in 2019 as part of the USDA trade mitigation efforts launched by Secretary Purdue. The ATP reimburses trade mitigation activities undertaken by nonprofit U.S. agricultural trade organizations, nonprofit state regional trade groups (SRTGs), U.S. agricultural cooperatives, and state agencies that conduct approved foreign market development activities and suffered damages as a result of tariffs imposed on U.S. agricultural products in 2018/2019. The program is administered by personnel of the Foreign Agricultural Service (FAS).

Although all of the available funding has been allocated to program participants and the program is no longer accepting applications, existing program participants have until September 30, 2024 to complete their activities under the current program agreements. As a result, program participants have ongoing performance and financial reporting requirements as well as administrative program obligations. The information collected by FAS is used to manage, evaluate, and account for government resources.

The integrity of the program hinges on information received from or maintained by the industry. The information collected provides evidence that taxpayer funds are being disbursed in accordance with authorizing legislation, ethical standards, and standard Government rules and regulations.

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.

All data collected are used by FAS marketing specialists and program managers for program management, planning, and evaluation. The data collection has, in almost every case, been mandated by either a GAO or OIG report to eliminate perceived deficiencies in the management of similar FAS programs and to establish additional program controls.

Evaluation: FAS requires applicants to submit evaluation plans and performance measures to (1) monitor performance of market development activities and programs, (2) evaluate the benefits and effects of these activities, and (3) document the experience gained from these

activities for use in the design and implementation of future market development programs. Based on this information, FAS program managers are also better able to determine what changes are needed to improve program performance when designing future programs.

Contribution Reports: FAS requires Participants to provide part of the resources needed to conduct promotion programs. Experience has shown that as the Participants increase their financial commitment, the organization enhances program management and supervision. Participants commit to a contribution level in their applications and are held to the contribution levels they specify in their applications. Contribution reports are required to ensure program participants have met their financial and in-kind obligations.

Reimbursement Claims: The annual application, approved by FAS, and corresponding amendments provide the authorities and limitations for Participants to make expenditures under project agreements. The Participant is responsible for instituting a financial management and accounting system that ensures accurate, current, and complete disclosure of all financial transactions for each approved activity. All expenditures incurred must be proper, reasonable, and in accordance with CCC regulations. The Participant is responsible for submitting claims to FAS requesting reimbursement for incurred costs as outlined in the application. Reimbursement claims are generally submitted on a monthly basis.

Office Management Records: Other reporting and recordkeeping requirements, i.e., travel reports, office management records, salaries, etc., are required as a means of ensuring that U.S. Government resources are disbursed as judiciously as possible. FAS requires the same control of Participant spending of taxpayer funds as the U.S. Government requires of its own employees. For example, FAS asks Participants traveling on U.S. Government funds to follow provisions of the Federal Travel Regulations; the purchase of office equipment follows General Services Administration purchasing practices; and salaries and allowances paid from U.S. Government funds, in most cases, follow GS salary levels or Embassy Foreign National salary scales. Again, all these requirements are placed on Participants to maximize return on investment and preserve program accountability.

Brand Program Operational Procedures. ATP Participants with branded programs are required to establish brand program operational procedures, and they are submitted on an annual basis to CCC for approval. Procedures must, at a minimum, include a brand program application, application procedures, application review criteria, brand participant eligibility requirements, a participation agreement, reimbursement requirements, compliance requirements, reporting and recordkeeping requirements, employment practices, financial management requirements, contracting procedures, and evaluation requirements. Participants will receive written official notification of whether or not the procedures are approved. Until written approval is received, Participants cannot enter into participation agreements with branded participants and may not implement any brand programs. These procedures are to be reviewed annually by the Participant.

Written Contracting Guidelines. Participants are required to submit to CCC, for CCC approval, written contracting guidelines for contracts that are funded, in whole or in part, with ATP funds. These contracting guidelines govern all of a Participant's ATP-funded contracting involving contracts with an annual value of \$35,000 or more. The guidelines indicate the method for evaluating proposals received for all contract competitions, the method for monitoring and evaluating performance under contracts, and the method for initiating corrective action for unsatisfactory performance under contracts. Participants will receive written official notification of whether or not the guidelines are approved, at which point guidelines remain in place until approval is retracted or new guidelines are approved that supersede them. Guidelines may be modified or resubmitted at any time.

Anti-fraud Prevention Program. All ATP Participants must annually submit to CCC for approval a detailed fraud prevention program. The fraud prevention program includes, at a minimum, an annual review of physical controls and weaknesses, a standard process for investigating and remediation of suspected fraud cases, and training in risk management and fraud detection for all current and future employees. Until the Participant has received written approval of their program from CCC, Participants cannot conduct any ATP activities or permit any ATP activities to occur. If the Participant receives an allegation of or information leading to a suspicion of misrepresentation or fraud, they must report it to a specified USDA contact and cooperate fully in and comply with any directives resulting from a USDA investigation.

Other Reports and Record Keeping Requirements: Other reports and records are required to ensure the proper and judicious use of Government resources. Each Participant must certify that any Federal funds received supplement, but do not supplant, private or third-party funds or other contributions to program activities. Participants must submit reports of findings whenever CCC resources are used for travel or research purposes. Auditable supporting documentation is required for all expenses reimbursed with CCC resources or claimed as a contribution. These include, but are not limited to: canceled checks, invoices, samples of produced materials, etc. Personnel records, including sick and annual leave, are required to document compliance with prescribed personnel policies. As a rule, such requirements conform to generally accepted Government standards.

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.

FAS uses the online Unified Export Strategy (UES) system to administer and manage its market development programs. That system has been enhanced to incorporate the administration of the ATP program, so that the ATP program utilizes the same submission and approval process as FMD and MAP. Reimbursement for activities under the ATP is also made through the UES.

The use of the UES, which collects all of a Participant's financial, program, and performance activity in a single system, eliminates the need for unnecessary and duplicative reporting via other methods (e.g., such as through the use of alternate Standard Forms), thereby reducing the reporting burden on the Participants and lessening the chances that a Participant will report incorrect information.

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.

FAS administers various agricultural export assistance programs, including the Foreign Market Development Program (FMD), the Market Access Program (MAP), the Emerging Markets Program, the Quality Samples Program, and the Technical Assistance for Specialty Crops Program. To facilitate the strategic planning processes of applicant organizations, as well as that of the Federal government, FAS unified and simplified the application and ongoing reporting processes for its agricultural export assistance programs. FAS recognized that a group interested in applying for more than one of these programs may have to submit some information multiple times. The on-line, unified application process (i.e., UES) removes duplicative information and allows Cooperators and Participants to submit a single document when applying for the existing five FAS market development programs.

The data required of Participants cannot be obtained from any other source other than the organization itself. ATP Participants will be commodity organizations or agricultural cooperatives (i.e., U.S. Wheat Associates, American Soybean Association, etc.) who develop marketing programs specifically for their commodities or products. Most of the data developed and presented to FAS are developed in-house by marketing and commodity analysts on their staffs. Some of the data, such as consumer or market surveys, are acquired via independent third parties for evaluation purposes.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Since all current program Participants are non-profit organizations, state government agencies, or agricultural cooperatives that generally represent growers, producers, and/or exporters of specific commodities, the information collection requirements imposed by these programs do not require any significant actions on the part of small businesses. However, the agency continues to review and revise its administration of the programs to better ensure accountability of program funds and program efficiencies.

A total of 63 distinct organizations were approved to participate in the ATP, and none were small businesses.

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.

The data collection requirements outlined above, except for periodic billings to FAS and travel reports, have been reduced to only one submission per year from those required for MAP and FMD, which are similar programs. Like MAP and FMD, the ATP program cannot be implemented without the submission of the information outlined above.

7. 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;**

There are special circumstances that are under the Participants' direct control; for example, reimbursement claims may be submitted more frequently than quarterly if desired by each Participant.

- **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 or government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a survey that is not designed to produce valid and reliable results that can be generalized to the universe of the 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 special circumstances that require the collection of information inconsistent with 5 CFR 1320, Section 5.

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.

FAS published a 60-day Notice of Proposed Information Collections for public comments in the Federal Register, Volume 87; Page 29847 on May 17, 2022. The public was given until July 18, 2022, to submit comments on the proposed information collection. No comments were received.

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

ATP is very similar to MAP and FMD. FAS marketing specialists consult with their counterparts in the Participant organizations to discuss program status, evaluations, management issues, and direction. FAS leadership is also in contact with Participant executives to discuss problems, program direction, and policy, and FAS administrative personnel are in contact with their counterparts to assist with procedural and accounting issues.

From July 11 to July 20, 2022, FAS reached out to 14 Participants, via email, regarding their feedback on the accuracy of the burden estimates. Below is a summary of the feedback FAS received from five Participants who responded:

- 1) Jennifer Sydney, Vice President of Planning, U.S. Wheat Associates (USW), 3103 10 Street, North Suite 300 Arlington, VA; mobile 703-731-6093; email: jsydney@uswheat.org; us.wheat.org

In their response, USW noted that the estimated average reporting burden for ATP is low. According to USW, the burden hours should, at least, be twice more than the estimates because there are other processes involved in ATP reporting, including the UES, country progress reports,

etc. For example, USW said that they spend about 35 hours preparing the required SF-424, SF-424a, SF-424a narrative, and SF-425 forms. This is because USW spent some time converting their “regular cost codes into the uniquely organized OMB categories” and the percentage contributions to actual dollars to fit in the boxes needed in the OMB standard forms. USW added that the required narrative takes time to complete because it involves aggregating itemized information, including domestic and overseas staffing and salaries, travel expenses, frequency of trips, number of contracts expected, etc. to arrive at the single line item required in the forms.

USW considers the SF-424 forms “unreasonable” and asked how they were being used. In addition, since the narrative form differs from cooperator to cooperator, USW also questioned how the documents were being stored, reviewed, critiqued, verified, and recorded? USW also commented that the standard forms are “so odd and not well thought out,” i.e., the forms do “not even have a location for the cooperator name on it...we have to hand-write our name at the top of this form” and are “extremely burdensome and (expressed) hope that something can be done to improve the situation”.

FAS response: The SF-424, SF-424a, and SF-424a narrative were part of the 10 OMB standard forms required by FAS in applying to the ATP program in 2018. These forms were a one-time requirement, and many are no longer required. The SF-425 is a financial reporting form required to be submitted to FAS annually over the life of the ATP agreements, which are expected to expire in 2024. Until then, FAS will continue to provide guidance and assistance to all Participants in completing the SF-425 and has used the UES homepage to make the announcements for its submission way ahead of the deadline.

- 2) Lynsey Kennedy Wallace, International Marketing Manager, Pear Bureau Northwest (OWCPB), 4382 SE International Way, Suite A, Milwaukie, OR 97222, telephone no. 503-652-9720; fax: 503-652-9721; email: llwallace@usapears.com; www.usapears.org

OWCPB considers the burden estimates for evaluation, travel reports, and contracting and anti-fraud prevention appropriate while the contribution report, administrative procedures, and office management records are underestimated. To make the process easier for Participants, NWPB suggests a general template for writing the annual performance reports and better guidance in the preparation of the SF-424 and SF-425. Because OWCPB operates on a July-June marketing year, reporting becomes complicated and difficult as reporting is done on a calendar year basis.

The online UES system for ATP is easy because OWCPB is very familiar with it because they have been using it in MAP for many years. According to OWCPB, what made the ATP application process a challenge was the short submission deadline.

FAS response: FAS will continue to provide guidance and assistance to all Participants in completing the SF-425 and has used the UES homepage to make the announcements for its submission way ahead of the deadline.

- 3) Juliemar Rosado, Director of Retail & International Marketing, National Watermelon Promotion Board (NWPB); 1321 Sundial Point, Winter Springs, FL 32708; work telephone no. 407-657-0261 extension 208; mobile phone: 321-356-3422; jrosado@watermelon.org; watermelon.org

NWPB agrees with the burden estimates for ATP. NWPB considers ATP to be easier to manage because its processes and reporting are similar to MAP that NWPB also participates in. Because ATP is similar to MAP, preparing the contracting and fraud prevention plans was not a hardship, but NWPB considers them to be redundant.

NWPB appreciates the online UES system because it makes the application process easier and is eager about the news that the UES will be updated. NWPB considers the SF standard forms “extra work” and redundant as some of the information required in the forms are eventually entered in the UES.

FAS response: FAS continues to work with the UES IT team to make refinements and enhancements in the UES system to make it easier for Participants to comply with program requirements.

- 4) Dinah Tobey, Marketing Coordinator, on behalf of Kimberlee Breshears, Chief Marketing Office, National Potato Promotion Board (NPPB), 3675 Wynkoop Street, Denver, CO 80216; telephone no. 303-369-7783; email: kim@potatoesusa.com; potatoesusa.com

According to NPPB, the reporting requirements for ATP were unclear and inconsistent from year to year. For example, NPPB said that the information being requested in the annual reporting for ATP differ from one year to the next, so NPPB has to revise their reporting formats every year to fit what is required for that year, and then again the succeeding years. To help minimize this confusion, NPPB suggests that FAS clarify expectations from Cooperators and provide well-defined directions and a list of the type of information required to be submitted at the beginning of each program year. NPPB indicated that complying with submitting the contracting and fraud prevention procedures for ATP does not pose a hardship for them but stated that the burden estimate for the administrative and office management record keeping is low.

NPPB mentioned that the required ATP reporting period which falls on a calendar year makes collecting information difficult because NPPB operates on a July-June marketing year.

Finally, NPPB expressed an unfavorable reaction to the 10 OMB SF standard forms that were required to accompany their ATP application in 2018.

FAS response: Except for the SF-425, which is required to be submitted at the end of each program year, the 10 OMB SF forms are no longer necessary. FAS has attempted to put in place processes to reduce the paperwork burden on program Participants and will consider additional suggestions as we continue to explore options to further minimize any hardships to Participants

in all its market development programs.

- 5) Sarah Moran, Vice-President, USA Rice Federation (USARF), 2101 Wilson Boulevard, Suite 610, Arlington, VA 22203, (703) 236-2300; smoran@usarice.com

USARF considers the burden estimates acceptable but expressed the need for “clarity on the SF-424, SF-424A, and SF-425, particularly on the timing of their submission.” USARF suggests that email reminders be sent to Participants at least one to 6 months in advance when these requirements are due.

FAS response: Except for the SF-425, which is required to be submitted at the end of each program year, the SF-424 and SF-424A are no longer needed for ATP. FAS will consider suggestions as we continue to explore options to further minimize any hardships to Participants in all its market development programs

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

The agency does not provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

In the past, Cooperators and Participants have been aware that information collected relating to FMD and MAP is generally open for public inspection, but the agency may withhold information which could cause substantial competitive harm to the submitter under exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. 552(b)(4). The same applies to the ATP. It is also the agency’s policy, prior to responding to a FOIA request, to obtain and consider the views of the submitter of the information if the information submitted is not readily identifiable as privileged or business confidential. If the agency disagrees with the views presented by the submitter, it will give the submitter sufficient time, prior to release of the information, to pursue legal action to prevent the release.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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 sensitive questions involved in this information collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **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 83–1.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contraction out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The current annual burden estimate is based on prior estimates for the FMD and MAP programs. For ATP, the annual total burden estimate of 55,029 hours is based on separate estimates of eight distinct areas of data collection: evaluations of marketing activities and programs, travel reports, contribution reports, administrative functions, office management records, brand program operational procedures, written contracting guidelines, and an anti-fraud prevention program. The estimates used to determine the burden on the public are explained as follows:

- a) Evaluations. Participants are required to evaluate the effectiveness of their programs. FAS encourages Participants to use the GPRA as a guideline for their evaluations. Applications include evaluation plans and performance measures in order to (1) monitor performance of market development activities and programs, (2) evaluate the benefits and effects of these activities, and (3) document the experience gained from these activities for use in the design and implementation of future market development programs. Establishing good performance measures enables Participants to perform meaningful evaluations. Based on these evaluations, Participants and FAS program managers are better able to determine what changes are needed to improve program performance and designing future programs. It is estimated that it will take approximately 59 hours to complete annual evaluations,

analyze the results, and develop a written report that summarizes the evaluation process and findings.

- b) Travel Reports. Since travel is a very important part of overseas market development, the number of trips involving both 1) the United States and 2) foreign countries amounts to about 2,016 trips per year. As the U.S. Government requires trip reports from government employees, FAS also finds this type of information extremely useful as a management tool. Participant trip reports provide valuable insight to market situations and program issues. The average time required to prepare travel reports is 1 hour per trip.
- c) Contribution reports. Each Participant will prepare a summary contribution report each year via a web-based interface. Depending on the size and scope of the program, smaller Participants may need only a couple hours to prepare the report, whereas larger Participants may need several weeks. The average time required to prepare the contribution report is 8 hours per Participant.
- d) Administrative Procedures. Participants will be responsible for submitting reimbursement claims to FAS requesting reimbursement for program expenditures. Participants bill FAS whenever they feel their costs are of sufficient size to justify a claim for reimbursement. Participants are required to maintain receipts for all program related expenditures more than \$25.00. The estimate of 40 hours per claim includes all incidental office costs and procedures necessary to prepare and support each claim.
- e) Office Management. Participants will be required to keep good office records available for audit. These records include such things as salary computations, receipts for all disbursements, time and attendance records, etc. The average time required to prepare and maintain office records is 90 hours per Participant.
- f) Brand Program Operational Procedures. Participants with branded programs are required to establish brand program operational procedures that must be submitted on an annual basis to CCC for approval (not all Participants have branded programs). Procedures must, at a minimum, include a brand program application, application procedures, application review criteria, brand participant eligibility requirements, a participation agreement, reimbursement requirements, compliance requirements, reporting and recordkeeping requirements, employment practices, financial management requirements, contracting procedures, and evaluation requirements. The average time required to prepare the brand program operational procedures is 2 hours per Participant.
- g) Written Contracting Guidelines. Participants are required to submit to CCC, for CCC approval, written contracting guidelines for contracts that are completely or

partially funded with ATP funds. These contracting guidelines govern a Participant's ATP-funded contracting involving contracts with an annual value of \$35,000 or more. The guidelines indicate the method for evaluating proposals received for all contract competitions, the method for monitoring and evaluating performance under contracts, and the method for initiating corrective action for unsatisfactory performance under contracts. The average time required to prepare the contracting guidelines is 2 hours per Participant.

- h) Anti-fraud Prevention Program. Participants must annually submit to CCC for approval a detailed fraud prevention program. At a minimum, the program must include an annual review of physical controls and weaknesses, a standard process for investigating and remediation of suspected fraud cases, and training in risk management and fraud detection for all current and future employees. The average time required to prepare the fraud prevention program is 2 hours per Participant.

The estimated total cost to respondents for reporting and recordkeeping is \$2,588,250, which includes fringe benefits and is based on the following:

<u>ITEM</u>	<u>DESCRIPTION</u>	<u>NUMBER OF RESPONDENTS</u>	<u>FREQUENCY</u>	<u>TOTAL RESPONDENTS</u>	<u>AVERAGE HOURS PER RESPONDENT</u>	<u>TOTAL HOURS</u>	<u>*COST PER HOUR</u>	<u>COST TO PUBLIC</u>
A)	<u>Evaluation of Marketing Activities and Programs</u>	63	1	63	59	3,717	\$70	\$260,190
B)	<u>Travel Reports</u>	63	32	2,016	1	2,016	\$65	\$131,040
C)	<u>Contribution Reports</u>	63	1	63	8	504	\$45	\$22,680
D)	<u>Administrative Procedures</u>	63	17	1,071	40	42,840	\$45	\$1,927,800
E)	<u>Office Management Records</u>	63	1	63	90	5,670	\$40	\$226,800
F)	<u>Brand Program Operational Procedures</u>	15	1	15	2	30	\$70	\$2,100
G)	<u>Written Contracting Guidelines</u>	63	1	63	2	126	\$70	\$8,820
H)	<u>Anti-fraud Prevention Program</u>	63	1	63	2	126	\$70	\$8,820
TOTAL		varies	varies	3,417		55,029		\$2,588,250

* Based on data from the Bureau of Labor Statistics for 43-0000 - Office and Administrative Support Occupations, a reasonable hourly estimate ranging from \$40 to \$70 (which includes benefits of 25%) per hour has been used as the average cost for respondents' program participation. The total annual estimated burden in dollars is \$2,588,250.

13. Provide an estimate 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 Items 12 and 14).

- **The cost estimate should be split into two components: (a) a capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of the methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include among other items, preparations for collection information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**
 - (a) There is no cost burden to respondents associated with capital or start-up costs.
 - (b) There is no cost burden to respondents associated with operating or maintaining systems or purchasing systems.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annual costs to the Federal Government, including fringe benefit costs, for all submissions found in the guidelines are as follows:

DESCRIPTION	DIVISION	RATE	ESTIMATED HOURS	TOTALS HOURLY COSTS
A) Evaluations	POD	\$40	270	\$10,800
	COPD	\$40	1,350	\$54,000
B) Contributions	POD	\$40	810	\$32,400
	COPD	\$40	80	\$3,200
C) Administrative Procedures	POD	\$40	4,510	\$180,400
TOTALS			7,020	\$280,800

Note: POD refers to the Program Operations Division of Global Programs at FAS. This office is responsible for the administrative operation of the ATP. COPD refers to the Cooperator Programs Division of FAS which is responsible for managing the day-to-day contact with program participants.

**The annual estimated cost to the Federal Government for this collection is \$280,800. Average hourly costs is estimated at approximately \$40 per hour, based on the 2022 General Pay Scale for a GS-11 Step 4, which represents the FAS staff reviewing information submissions. The hourly cost used in the estimate includes fringe benefits.

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

The initial information collection cost and burden hour calculations included the preparation and review of applications and used an estimated number of program participants. Because the program is no longer open to applications and the total number of program participants is now known, FAS has more precise information to make the calculations. The SF–424, SF–424a, SF-424b, SF-LLL, AD-1047, AD-1048, AD-1049, AD-1052, AD-3030, AD-3031 were part of the 10 OMB standard forms required by FAS in applying to the ATP program in 2018. These forms were a one–time requirement, and many are no longer required.

This updated information collection request eliminates the burden estimates for the submission and review of the applications and reduces the total number of respondents from 71 to 63, resulting in a decrease in burden hours from 63,978 to 55,029.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

FAS has no plans to tabulate or publish the information FAS collects.

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.

There are no forms associated with this information collection that do not display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83–1.

There are no exceptions.