

SUPPORTING STATEMENT
for the
FOREIGN MARKET DEVELOPMENT COOPERATOR PROGRAM
and
MARKET ACCESS PROGRAM
(0551–0026)

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 authority for the Foreign Market Development Cooperator Program (FMD) and the Market Access Program (MAP) is contained in Title VII and section 203 of the Agricultural Trade Act of 1978, 7 U.S.C. 5623, as amended, which took effect October 21, 1978. The programs were reauthorized by the Agriculture Improvement Act of 2018 (section 3201), which became effective December 20, 2018. The primary objective of the FMD and MAP programs is to encourage and aid in the creation, maintenance and expansion of commercial export markets for United States agricultural commodities and products through cost–share assistance to eligible trade organizations. Financial assistance for both programs is made available on a competitive basis. The programs are administered by personnel of the Foreign Agricultural Service (FAS).

Prior to initiating program activities, each Cooperator or MAP Participant must submit a detailed application to FAS. They are also required to maintain records on all information submitted to FAS. The information collected is used primarily by FAS to manage, plan, evaluate, and account for government resources. Specifically, data is used to assess the extent to which: applicant organizations represent U.S. commodity interests; benefits derived from market development efforts will translate back to the broadest possible range of beneficiaries; the market development efforts will lead to increases in consumption and imports of U.S. agricultural commodities in the target market; the applicant is able and willing to commit personnel and financial resources to assure adequate development, supervision, and execution of project activities; and private organizations are able and willing to support the promotional program with aggressive marketing of the commodity in question.

The integrity of both programs hinges on information received from or maintained by the industry. 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 is used by FAS marketing specialists and program managers for the allocation of funds, 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 program management and to establish additional program controls.

Allocation Criteria: The criteria for the allocation of funds are enumerated in the program regulations as well as the annual announcements of the Cooperator Program and the Market Access Program, which are published on Grants.gov. FAS considers a number of factors when reviewing proposed projects. These factors include the ability of the organization to provide an experienced U.S.–based staff with technical and international trade expertise to ensure adequate development, supervision, and execution of the proposed project; the applicant’s willingness to contribute resources, including cash and goods and services of the U.S. industry and foreign third parties; the conditions or constraints affecting the level of U.S. exports and market share for the agricultural commodities and products to be promoted; the degree to which the proposed project is likely to contribute to the creation, expansion, or maintenance of foreign markets; the degree to which the strategic plan is coordinated with other private or U.S. government–funded market development projects; the applicant’s past export and demand expansion performance; and the accuracy of the applicant’s past export projections.

Applications: Through the application, prospective Cooperators or Participants submit data about their organizations so that FAS can apply the allocation criteria discussed above. The application is also the primary strategic planning document. The application assesses market potential, outlines Cooperator or Participant strategy and goals, explains and justifies individual activities, provides estimated budgets, and includes benchmarks and goals for evaluating performance. Prior years’ applications also dictate current application content because many activities continue or follow–up on previous activities. The scope and content of each application depends largely on the applicant’s organizational style, marketing approach, and method of operation.

Project Agreements: The project agreement is a binding instrument and creates a legal obligation on the part of CCC to make appropriated funds available to the Cooperator or Participant. The agreement creates a cooperative relationship between CCC and the Cooperator or Participant outlining the basic responsibilities of each party and the contributed resources to support achievement of mutual goals.

Evaluation: FAS requires applicants to submit 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. Based on this information, FAS program managers are also better able to determine what changes are needed to improve program performance and design future programs.

Contribution Reports: FAS requires Cooperators and Participants to provide part of the resources needed to conduct promotion programs. Experience has shown that as the Cooperators or Participant increase their financial commitment, the organization enhances program management and supervision. Cooperators and Participants commit to a contribution level in their applications. This is one criterion that is used in the allocation of program resources. The Cooperators and Participants are, therefore, 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 Cooperators and Participants to make expenditures under project agreements. The Cooperator or 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 Cooperator or Participant is responsible for submitting claims to FAS requesting reimbursement for incurred costs as outlined in the application.

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 Cooperator or Participant spending of taxpayer funds as the U.S. Government requires of its own employees. For example, FAS asks Cooperators and Participants traveling on U.S. Government funds to follow provisions of the Federal Travel Regulations; the purchase of office equipment follows General Services 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 of these requirements are placed on Cooperators and Participants in order to maximize return on investment and preserve program accountability.

Brand Program Operational Procedures: MAP Participants with branded programs (branded programs are not available in the Cooperator program) 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 and cooperators are required to submit to CCC, for CCC approval, written contracting guidelines for contracts that are funded, in whole or in part, with MAP funds. These contracting guidelines govern all of a Participant's MAP-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 for FAS review and approval at any time.

Anti-fraud Prevention Program: All MAP 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 MAP activities or permit any MAP 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 Cooperator and Participant must certify that any Federal funds received supplement, but do not supplant, private or third-party funds or other contributions to program activities. Cooperators and 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 continues to use a web-based interface known as the United Export Strategy (UES) system that permits electronic submission of a single, holistic application to the FAS market development programs. By allowing applicants to apply for several FAS programs in a single application, FAS has eliminated a vast amount of duplicative information that was previously required.

The UES system allows reimbursement claims to be entered directly in the system, streamlining the receipt of financial documentation and resulting in a major reduction in one of the largest paperwork requirements in the system. In developing the UES for the electronic submission of reimbursement claims and program applications, FAS has worked extensively with Cooperators and Participants to develop a user-friendly system that is compatible with other software applications used by the Cooperators and Participants. Participants can also submit their brand promotional procedures, contracting guidelines, and anti-fraud prevention plans electronically to a central mailbox, which saves significant time.

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 Cooperator Program, the Market Access Program, the Emerging Markets Program, the Quality Samples Program, and the Technical Assistance for Specialty Crops Program. In an effort to facilitate the strategic planning process of applicant organizations, as well as that of the Federal government, FAS unified and simplified the application process 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

removes duplicative information and allows Cooperators and Participants to submit a single document when applying for the five FAS market development programs.

The data required of Cooperators and Participants cannot be obtained from any other source other than the organization itself. Cooperators or Participants are 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 is 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.

Only nonprofit U.S. agricultural trade organizations, nonprofit state regional trade groups, U.S. agricultural cooperatives, and state government agencies are eligible to participate in the programs, so the information collection burden estimated in this request is only imposed on those eligible organizations. The information collection requirements imposed by these programs do not impose any significant burdens on 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.

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. The program could not 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;**
- * **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.**

FAS does not require any special collections of information.

8. If applicable, provide a copy and identify the date and page number of publications 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 40778 on July 8, 2022. The public was given until September 6, 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.

From August 11–23, 2022, FAS reached out to 18 Participants by email to solicit their feedback on the accuracy of the burden estimates for collecting and reporting information required for the FMD and MAP programs. Of the 18 groups contacted, five provided feedbacks, with a summary of their responses noted below:

Stephen M. Sothmann, President, Leather and Hide Council of America (USHSLA), 1150 Connecticut Avenue, NW, 12th floor, Washington, D.C. 20036; (202)587–4250; Steve@USLeather.org; <https://www.USLeather.org/>

USHSLA wrote that the burden hours estimated are reasonable but considers the burden estimates for travel reporting, administrative procedures, office management, and drafting fraud prevention guidelines to be high.

According to USHSLA, as a small organization, these areas of their MAP program require less time for them to complete compared to larger organizations.

FAS response: FAS appreciates this response and understands that different organizations will have different reporting burdens, based on the size and scope of their individual programs.

Lainey Wolf, International Program Manager, American Seed Trade Association (ASTA); 701 Duke Street, Suite 275, Alexandria, VA 22314, lwolf@betterseed.org; (703) 837–8140; <https://www.betterseed.org/>

Overall, ASTA indicated that the information and reporting requirements for MAP are not burdensome because ASTA has internal processes in place to comply with all of FAS requirements. For example, because ASTA conducts program evaluations on a regular basis (i.e., weekly or monthly), updating their market promotion strategies and performance measures is less time consuming. For travel reports, claims, fraud prevention and contracting procedures, and other reporting required in MAP, ASTA has created templates and established internal procedures that make it easier to submit these requirements to FAS on time. However, of the 10 distinct areas of data collection, ASTA considers preparing their contribution report burdensome because ASTA members still are unable to determine which activities or cost categories are eligible to be counted as industry contributions, spending 20 hours on contribution reports than the 8 hours burden estimates.

FAS response: FAS appreciates the steps ASTA has taken to streamline their internal processes to simplify their reporting requirements and will continue to explore options and opportunities to provide technical assistance and guidance to reduce burden on all Participants, in addition to making FAS staff readily available for technical support and through meetings at the USAEDC conference.

Lynsey Kennedy Wallace, International Marketing Manager, Pear Bureau Northwest (OWCPB), telephone no. 503–652–9720 ; fax: 503–652–9721; email: llwallace@usapears.com; www.usapears.org

OWCPB said that some areas of the information collection for MAP are realistic but the burden estimates for putting together the UES application, conducting evaluations, and consolidating their yearly contribution reports are low.

For instance, OWCPB believes that spacing out the FAS deadlines between the submission of the UES application, the MAP fraud prevention and contracting plans which is due 30 days later, and then success stories, and other required reports due around the end of the fiscal year may allow Participants more time to prepare and meet the deadlines. According to OWCPB, some of the MAP deadlines coincide with those due for ATP which they also participate in. In addition, OWCPB also proposed that FAS send reminders of program deadlines either directly to Participants or through the USAEDC. OWCPB noted and appreciate that fewer standard forms are required by FAS to be completed in recent years. However, OWCPB suggested that additional guidance from FAS on how to correctly complete them will be helpful and clarify what information is being collected in these forms, and what and how they are being used.

Finally, since support for Internet Explorer (IE) ended on June 15, 2022, OWCPB expressed concern that the ease of using the “paste in spreadsheet mode” functionality for filing claims available only through IE will be a

hardship. OWCPB estimated that without this functionality, it will add 2 hours per month for filing claims in the UES and 2 hours per market when entering this information in OWCPB's UES application. In addition, OWCPB offered the following suggestions in making the UES online reporting less cumbersome and more user friendly: i) create simple category codes for entering activities instead of the current format; ii) add text box field for entering CISP; iii) simplify the format for submitting UES application as a pdf instead of the current layout, which seems "fragmented", as well as the performance measures section which, in its current format, is particularly difficult to do.

FAS response: FAS appreciates this feedback and continues to engage with the UES IT team to explore ways to streamline the UES online system and make it more user friendly to all Participants. FAS is aware of the technical issues brought about by the departure from IE and is working with the UES team on solutions to minimize undue hardship on all Participants.

Martin Sieber, CEO, US Livestock Genetics Export, Inc. (USLGE), 522 Springdale Street, Suite 102, Mount Horeb, WI 53572; msieber@uslge.org; (606) 437-2020; <https://www.uslge.org/>

As a large organization operating a MAP brand program and also participating in FMD, USLGE estimated that the areas of data collection and required reporting involve more time than the burden hours estimated. According to USLGE, they spend 1,200 hours, four times more than the burden hours estimated, to put together their UES application because they spend months collecting information from numerous sub-awardees who participate in their brand program and more time in consolidating the information into one application. Evaluations also take more time because USLGE conducts an additional evaluation for the brand program they operate. Because of the frequency of trips their staff take every year in all their targeted markets, USLGE uses more time in completing travel reports than what is estimated. Burden estimates for contribution reports for USLGE are also much higher, about 50 hours per report because they prepare separate reports for MAP and FMD. And finally, USLGE said they spent an average of 50 hours per claim from processing to filing in the UES online system.

FAS response: FAS appreciates this response and understands that different organizations will have different reporting burdens, based on the size and scope of their individual programs. For those organizations like USLGE with larger programs and commensurately higher reporting burdens, FAS continues to explore ways to reduce the reporting burden. FAS works closely with the UES technical team to improve and streamline the UES online reporting process and extends technical assistance and guidance to all Participants, in addition to making FAS staff readily available for technical support, consultations, and meetings, either one-on-one or through the USAED.

Teresa Baggaley, International Program Manager, Washington State Fruit Commission NW Cherry Growers (NWCG); 105 S. 18th Street #205 Yakima, WA 98901; teresa@nwcherries.com; 509-453-4837; <https://wastatefruit.com/>

NWCG agreed that, in general, the burden estimates are realistic as they apply to some of NWCG's activities and operations. However, NWCG said that they spend twice as many hours in conducting their program evaluation than the 80 hours estimated by FAS and spend more time verifying their contribution numbers and preparing a correct contribution report than FAS estimates.

FAS response: FAS continues to look at options to reduce the burden on all Participants in all aspects of the data collection and reporting required by its market development programs by working on streamlining operational processes, providing technical assistance, and making staff available for technical support in all areas of the program operations where needed.

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.

Cooperators and Participants are aware that information collected relating to these programs 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). 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 estimated at 88,922 total hours is based on separate estimates of 10 distinct areas of data collection for the FMD and MAP programs: applications, program agreements, program evaluations, travel reports, contribution reports, administrative procedures, office management, brand operational procedures, written contracting guidelines, and anti-fraud prevention guidelines. The fringe benefit cost is accounted for in the total dollar amount. The estimates used to determine the burden on the public are explained as follows:

- a) Applications. Applications include many separate estimates, projections, goals, etc., all of which make up a comprehensive application. The current estimate for one Cooperator or Participant to complete an application is approximately 320 hours. As explained earlier in this document, less information is requested from Cooperators and Participants than in the past, and multiple programs are applied for with a single application.
- b) Program agreements. The estimated burden hours for program agreements includes preparing new or amending already active program agreements. Participating organizations take approximately 2 hours to review the project agreement (contract), clear them with legal counsel (if necessary), sign them, and return them to FAS. On average, 268 program agreements or amendments are signed each year.
- c) Evaluations. Cooperators and Participants are required, under the MAP and FMD regulations, to evaluate the effectiveness of their programs. FAS encourages Cooperators and 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 Cooperators and Participants to perform meaningful evaluations. Based on these evaluations, Cooperators, 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 80 hours to complete annual evaluations, analyze the results, and develop a written report which summarizes the evaluation process and findings.
- d) 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 2,680 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. Cooperator and Participant trip reports provide valuable insight to market situations and program issues. The average time required to prepare travel reports is 2 hours per Cooperator or Participant.

- e) Contribution reports. Each Cooperator and Participant prepares a summary contribution report each year via a web-based interface. Depending on the size and scope of the program, smaller Cooperators or Participants may need only a couple of hours to prepare the report, whereas larger Cooperators or Participants may need several days. The average time required to prepare the contribution report is 8 hours per Cooperator or Participant.
- f) Administrative Procedures. Cooperators and Participants are responsible for submitting claims to FAS requesting reimbursement for program expenditures. Cooperators and Participants submit a claim whenever they deem their costs are of sufficient size to justify a claim for reimbursement. Cooperators and Participants are required to maintain receipts for all program related expenditures in excess of \$25.00. The estimate of 40 hours per claim includes all incidental office costs and procedures necessary to prepare and support each claim.
- g) Office Management. Cooperators and Participants are required to keep good office records available for audit review. These records include items such as salary computations, receipts for all disbursements, time and attendance records, etc. Only 9 Cooperators have foreign offices supported by Cooperator project funds. In addition, FAS requirements apply only to Cooperator overseas offices and only if a portion of the cost is paid with project funds or counted as a contribution. The average time required to prepare and maintain office records is estimated at 800 hours per Participant.
- h) 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, and branded programs are not available in the Cooperator program). 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 estimated at 8 hours per Participant.
- i) 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 MAP funds. These contracting guidelines govern all of a Participant's MAP-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 estimated at 10 hours per Participant.
- j) Anti-fraud Prevention Guidelines. MAP Participants must annually submit to CCC for approval a detailed fraud prevention guideline. At a minimum, the guideline 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 guideline is estimated at 20 hours per Participant.

	DESCRIPTION	<u>NO. OF RESPONDENTS</u>	FREQUENCY	TOTAL RESPONSE	<u>AVERAGE HOURS PER RESPONDENT</u>	TOTAL HOURS	<u>*COST PER HOUR</u>	<u>COST TO PUBLIC</u>
A)	<u>Applications</u>	67	1	67	320	21,440	\$75	\$1,616,362
B)	<u>Project Agreements</u>	67	4	268	2	536	\$86	\$46,182
C)	<u>Evaluations</u>	67	1	67	80	5,360	\$75	\$404,090
D)	<u>Travel Reports</u>	67	40	2,680	2	5,360	\$70	\$375,227
E)	<u>Contribution Reports</u>	67	1	67	8	536	\$48	\$25,977
F)	<u>Administrative Procedures</u>	67	17	1,139	40	45,560	\$48	\$2,208,065
G)	<u>Office Management Records</u>	10	1	10	800	8,000	\$43	\$344,640
H)	<u>Brand Program Operational Procedures</u>	15	1	15	8	120	\$75	\$9,047
I)	<u>Written Contracting Guidelines</u>	67	1	67	10	670	\$75	\$50,511
J)	<u>Anti-fraud Prevention Program</u>	67	1	67	20	1,340	\$75	\$101,023
	TOTAL	Varies	Varies	4,447		88,922		\$5,181,124

* Based on data from the Bureau of Labor Statistics for 43-0000 - Office and Administrative Support Occupations, a reasonable hourly estimate ranging from \$43 to \$86 (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 \$5,181,124.

13. Provide an estimate 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 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 for all submissions found in the regulations are as follows:

DESCRIPTION	DIVISION	GS	*HOURLY RATE	ESTIMATED HOURS	TOTALS HOURLY COSTS
A) Applications	POD	13	\$51.18	90	\$4,606
	COPD	13	\$51.18	22,540	\$1,153,597
B) Agreements	POD	11	\$35.91	140	\$5,027
C) Evaluations	POD	13	\$51.18	270	\$13,819
	COPD	13	\$51.18	1,350	\$69,093
E) Contributions	POD	11	\$35.91	810	\$29,087
	COPD	12	\$43.04	80	\$3,443
F) Administrative Procedures	POD	11	\$35.91	4,510	\$161,954
TOTAL					\$1,440,627

*Based on the Office of Personnel Management 2022 General Schedule for the locality pay area of Washington-Baltimore -Virginia-West Virginia-Pennsylvania. The hourly cost used in the estimate includes fringe benefits.

Note: POD refers to the Program Operations Division of FAS. This office is responsible for administrative operation of the MAP and Cooperator program. COPD refers to the Cooperator Programs Division of FAS which is responsible for review of application and evaluation content and day to day contact with program participants.

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

There are no changes to the burden estimates.

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.

This question is not applicable for this combined information collection.

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.

This question is not applicable for this combined information collection.

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.