

SUPPORTING STATEMENT

International Agricultural Education Fellowship Program (IAEFP)

Part A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Describe the practical utility of the collection, including proposed and actual use. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The U.S. Department of Agriculture is required by 2 CFR 200.204 to announce discretionary grants and cooperative agreements and other financial assistance programs through public announcement. Notices of Funding Opportunities (NOFOs) are used to meet this requirement. To ensure grants are awarded to the applicant(s) best suited to perform the functions of the grant, applicants are generally required to submit an application. The International Agricultural Education Fellowship Program (IAEFP) receives applications through Grants.gov and uses standard forms in the SF-424 form family.

Established in 2018, IAEFP provides fellowships to eligible U.S. citizens to assist developing countries in establishing school-based agricultural education and youth extension programs. The primary purpose for this information collection is to implement the International Agricultural Education Fellowship Program (IAEFP). The intention of the IAEFP is to develop globally minded United States agriculturalists with experience living abroad, focus on meeting the food and fiber needs of the domestic population of eligible countries, and strengthen and enhance trade linkages between eligible countries and the United States agricultural industry.

The Authorities for the International Agricultural Education Fellowship Program (IAEFP) to provide grants to institutions of higher education (IHE) are:

- a.) National Agricultural Research, Extension, and Teaching Policy Act of 1977, PL 95-113, as amended, 7 USC §§ 3291 and 3319a
- b.) Agriculture Improvement Act of 2018, PL 115-334, Sec. 3307, 7 USC § 3295.

This opportunity is available to domestic private voluntary organizations, domestic nonprofit agricultural organizations or cooperatives, domestic nongovernmental organizations, or any other domestic private entities under the Agriculture Improvement Act of 2018, PL 115-334, Sec. 3307, 7 USC §3295.

The collection of the information requested is necessary to allow institutions of higher education (IHE) or domestic private voluntary organizations, domestic nonprofit agricultural organizations or cooperatives, domestic nongovernmental organizations, or any other domestic private entities to apply for grant funds.

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.

Eligible IHEs or domestic private voluntary organizations, domestic nonprofit agricultural organizations or cooperatives, domestic nongovernmental organizations, or any other domestic private entities use the approved information collection to prepare and submit grant applications in response to the notice inviting applications.

Discretionary Grant/Cooperative Agreement:

The information collected in response to solicitations for grant applications is used by FAS to evaluate applications and determine if applicants meet eligibility requirements. Application requirements include standard forms along with a detailed budget narrative paired with a budget table and a detailed project narrative explaining the plan of operation and implementation. FAS will utilize this information to issue grant funds to applicants most suited for fulfilling the mission of the program.

Performance Reporting:

FAS requires all grant recipients to submit semi-annual performance and financial reports detailing progress, challenges, and key milestones. These reports are essential to FAS’s monitoring of grants and cooperative agreements and should detail a comparison of actual accomplishments for the period with stated goals, the reasons why established goals were not met, if appropriate; and additional pertinent information when appropriate. FAS analysts review these documents to ensure that funds are dispersed and that activities are conducted in compliance with the signed agreement. This information is needed to satisfy statutory requirements, to assure that public resources are used properly.

Forms Approved under Other OMB Control Numbers:

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

Standard forms are used to apply for assistance under this program. Applicants use these forms to outline scope, costs and expenses for the project. Standard forms are also used by the recipient of financial assistance to request the approved funds.

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 burdens.

The Foreign Agricultural Service is committed to the reduction of paperwork and has been collecting this information electronically. Electronic submission has reduced the burden for both the applicants and Department staff. Collection of information involves the use of electronic submission of responses via Grants.gov.

Grants.gov allows customers to submit electronic applications to the Federal agency. The IAEFP Staff collects Fellow information from the implementer and this information is then entered into the International Fellowship and Exchange Database System (IFEDS) by FAS staff.

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.

The information collected in USDA funding announcements and associated forms, and in the associated reporting requirements is unique to each grant; therefore, it is not duplicated in any other source. As applicable, the Department utilizes currently approved standard forms and will not duplicate information collected on these forms.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. Describe how the collection reduces, to the extent practicable and appropriate, the burden on all persons, including small entities, providing information.

This collection does not impact small businesses and other small entities.

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 the burden.

Collection of the data is necessary for the implementation of USDA's Foreign Agricultural Service, IAEFP Program. Information is collected only when the grantee chooses to submit an application for consideration of financial assistance award. The submission of information must be timely in order to properly screen and evaluate applications and perform the administrative review of recommendations for award. Lack of adequate information to make the determination could result in the improper administration of Federal grant funds. If the collection is not approved, we will not be able to conduct the competition for these programs. Without approval to collect the necessary information, FAS' ability to make awards will be compromised.

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, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary, trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances.

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 C.F.R. § 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 65025 - 65026 on October 27, 2022. The public was given until December 27, 2022, to submit comments on the proposed information collection. FAS received no comments on this proposed collection.

- **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.**

FAS consulted with past recipients to determine burden estimates of the International Agricultural Education Fellowship Program and obtained their views on the collection of information, to include:

Participant #1 Organization: Texas A&M University POC: Dr. Jack Elliot Email: jelliot@tamu.edu Phone: 979-676-2996	Participant #2 Organization: University of Missouri POC: Lindsey Saunders Email: SaundersL@missouri.edu Phone: 573-882-0092	Participant #3 Organization: Catholic Relief Services POC: Juliana Lawniczak Email: Juliana.Lawniczak@crs.org Phone: NA
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These organizations reported that the burden estimates for this information collection were generally accurate. Two participants are institutions of higher education, and the other is a nongovernmental organization. Participant #1, #2 and #3 reported that the burden estimates for this information collection were reasonable. Participant #1 estimated 275 hours; participant #2 estimated 225 hours; participant #3 estimated 90 hours. Once estimates were received, FAS confirmed receipt and thanked past participants not only for their estimate but also for their interest and participation in our programs. FAS used an average of the estimated responses to calculate the burden.

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

The Department does not provide any payment or gift to respondents in connection with this ICR.

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

The Department makes no assurance of confidentiality to those responding to funding announcements and associated forms; however, as a practical matter, disclosures are only made in compliance with the Freedom of Information Act (FOIA) and USDA regulations implementing that statute.

The collection is covered under the following System of Records Notice:

- USDA/FAS–10, USDA/FAS, Foreign Agricultural Service International Fellowship and Exchanges Database System, (FAS–IFEDS). July 12, 2022, 87 FR 41275.

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.

Application and reporting requirements in funding announcements and associated forms do not ask questions of a sensitive nature.

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.**
- **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 contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

For purposes of calculation, FAS references FY 2020 (the most recent complete “normal” program year) and notes that 16 NOFO applications were received, and 2 award actions were made.

Information Collection	Number of Respondents	Average Number of Responses per Respondent	Total Annual Responses	Burden Hours/Minutes per Response	Total Annual Burden Hours	*Hourly Cost	Total Annual Cost
Discretionary Grant/Cooperative Agreement	16	1	16	196	3,136	\$54	\$169,344
Performance Reporting	2	2	4	2	8	\$54	\$432
Totals	16				3,144		\$169,776

**Costs include fringe benefits.*

FAS based estimates on historical experience. The estimate for this collection is derived from FY 2020. FAS estimates that 16 respondents will submit applications to the Program. Based on the number of awards made and the agency’s experience with the grant program, the annual cost to participants for this collection is \$169,776 (. For purposes of this information collection request,

FAS used an hourly cost of \$54 per hour which is on the 2023 General Pay Scale for a GS-13 Step 1 business professional. The cost used in the estimate includes fringe benefits.

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 total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of 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 collecting 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.

There are no capital or start-up costs associated with this collection package.

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 17, 18, and 19 in a single table.

Information Collection	Number of Respondents	Number of Responses per Respondents	Total Annual Responses	Burden Hours/Minutes per Response	Total Government Burden Hours	*Gov. Hourly Cost	Total Gov Annual Costs
Discretionary	16	1	16	30	480	\$61	\$29.280

Grant/Cooperative Agreement							
Performance Reporting	2	2	4	.5	2	\$61	\$122
Totals	16				482		\$29,402

**Costs includes fringe benefits.*

The annual estimated cost to the Federal Government for this collection is \$29,402. Hourly cost are estimated to be \$61 per hour based on the 2023 General Pay Scale for a GS-13 Step 5, which represents a FAS Program Manager reviewing information submissions. The cost used in the estimate includes fringe benefits.

15. Explain the reasons for any program changes or adjustments reporting in Items 12 or 13.

This is an existing collection in use without a valid OMB control number.

FAS developed an IT system (IFEDS) for the execution of this program which stores applicant information for the IAEFP Program. In the process of developing the system, it was discovered that this Program did not have an approved OMB Control Number for applications and evaluations. As soon as this became apparent, FAS immediately begin the ICR process to bring this IC into compliance with the PRA.

16. For collections of information in which 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 that is being collected.

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.

FAS will display the information collection information and expiration date.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submission."

There are no exceptions.

Part B. Statistical Methods

This information collection does not employ statistical methods.