# United States Department of Agriculture Farm Service Agency Supporting Statement OMB Control Number 0560-0000 Online Loan Application (7 CFR 764, Direct Loan Making)

The Farm Service Agency (FSA) Farm Loan Program (FLP) is requesting a new information collection request. FSA has developed an automated Online Loan Application. The FSA Online Loan Application will not replace the recently revised FSA-2001, however, it will provide an automated experience option for application completion and submission. Prior to submission of the application to FSA for processing, the online applicant will also have the ability to pay the required credit report fee online for loan making.

\*Note: Screenshots provided as part of the supporting statement documentation show the label of the software application as "FSA Direct Loan Application". However, a recent change was made to the label. With release of the software application, users will see the label as "FSA Online Loan Application".

Initial release of the FSA Online Loan Application will be available for individual applicants only. Future releases will allow application submissions from informal entities, including married couples, and legal entities. Future enhancements to the system will include the ability for the online applicant to manually enter actual production information directly into the system. With initial release, Emergency loans, Streamlined loans, Youth loans, and Primary Loan Servicing applications will not be available for submission through the system. Determinations on inclusion of these options will be made after initial release. This automated, intuitive application experience is a more effective and efficient tool for applicants and FSA officials alike.

#### **Justification**

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

FSA provides loans to family farmers to purchase real estate and equipment and finance agricultural production. The regulation covered by this information collection package describes the policies and procedures the agency uses to provide supervised credit to FLP applicants requesting direct loan assistance in accordance with the provisions of the Consolidated Farm and Rural Development Act (CONACT) (7 U.S.C. 1921 and Pub. L. 87-128), as amended. Direct loan making information collection requirements include debt verifications, employment & income verification, and actual financial and production records of the operation.

To comply with Executive Order 14058, the Secretary of Agriculture tasked FSA with simplifying the direct loan application process. The automated FSA Online Loan Application seeks to provide applicants an automated and intuitive application experience.

Authority to establish the regulatory requirements contained in 7 CFR 764 is provided under 5 U.S.C. 301, which provides that "The Head of an Executive department or military department may prescribe regulations for the government of his department … the distribution and performance of its business. Furthermore, section 339 of the CONACT Act (7 U.S.C. 1989) provides that "the Secretary is authorized to make such rules and regulations, prescribe the terms and conditions for making… loans, security instruments and agreements, except as otherwise specified herein, and to make such delegations of authority as he deems necessary to carry out the title." The Secretary delegated authority to administer the provisions of the CONACT applicable to FLP to the Under Secretary for Farm and Foreign Agricultural Services (FFAS) in section 2.16 of 7 CFR part 2. FFAS further delegated this authority to the FSA Administrator in section 2.42 of 7 CFR part 2.

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

Information is submitted by applicants through the FSA Online Loan Application. The local Agency office serving the county in which the applicant's farming business is headquartered will then access and process the application. The information being requested is necessary to thoroughly evaluate the applicant's request for a direct loan and is used by FSA officials to:

- Ensure the applicant meets the statutorily established program eligibility requirements.
- Ensure that cash flow projections used in determining loan repayment are based on the actual financial and production history of the operation.
- Ensure that a loan is adequately secured.

The general nature of a loan from the agency is very similar to that of any commercial creditor. However, applicants tend to pose a higher economic risk of loss than those operations financed by commercial creditors as applicants must document that no other source of credit is available at the time of application. Legislation requires the agency to actively supervise these applicants and provide credit counseling, management advice, and financial guidance. Thus, the monitoring, reporting, evaluation, and consent requirements of this supervision increase the information collection burden on agency applicants above those imposed by commercial creditors.

The information collection requirements established in 7 CFR 764 are described below and on the attached **Reporting and Recordkeeping Requirements spreadsheet**.

### Form Components

Note: Applicants choosing to submit their FLP requests through the FSA Online Loan Application will not be responding to or completing the FSA-2001 form specifically. However, the FSA-2001 form will be populated as a result of applicant responses to questions asked throughout the Online Loan Application process. Due to the FSA-2001 being populated as an end result of the online experience, it is listed as a form used for collection purposes.

### FSA-2001 – Request for Direct Loan Assistance

7 CFR 764.51(b)(1); 7 CFR 766.102(a)(2)

FSA uses FSA-2001 as its application form for both direct loan making and direct loan servicing requests. Information collected on FSA-2001 includes name, address, type of operation, marital status, race and ethnicity, citizenship, name and address of employer, as well as certifications pertaining to delinquent Federal debt, prior convictions for controlled substances, disqualification due to Federal crop insurance fraud, restrictions and disclosure of lobbying activities, and previous debt forgiveness by the agency. The information is used to:

- Ensure applicants requesting loan assistance or servicing meet statutory eligibility requirements.
- Determine if the applicant qualifies for funds targeted to socially disadvantaged applicants according to the CONACT's provisions.

• Determine the State where the agency must file the financing statements according to the Uniform Commercial Code requirements.

The FSA-2001 also requires all entity members (informal & legal entities alike) to provide information about percent of ownership in the entity, citizenship, marital status, ethnicity, race, gender, name and address of employer, as well as read the certifications provided and sign the form. For the FSA Online Loan Application, the applicant's personal information such as name, address, contact information, social security number, birth date, military veteran status, ethnicity, race, and gender will pre-populate the FSA-2001 completed during the automated experience. For entities choosing to apply online, percent ownership in the entity will be a required response.

Therefore, FSA estimates the following burden hours for the full FSA Online Loan Application experience:

Individuals: 1.30 hours Informal Entities: 1.60 hours Legal Entities: 2.00 hours

The variances in the time for completion necessary as all entity members are required to provide information applicable to individuals and certify and acknowledge that they have read the certifications included on the form.

Total estimated burden hours for the full FSA Online Loan Application experience are 59,389 hours. This assumes that all FLP requests for loan making and primary loan servicing assistance are submitted via the FSA Online Loan Application portal. Of that full experience, 29,877 hours are devoted to collection of responses similar to the paper FSA-2001 application form. The remaining 29,512 estimated burden hours are associated with the non-form collection components as explained below.

### **Non-Form Collection Components**

Note: Non-form sections are provided to explain process and burden hours for obtaining supporting documents as part of the FSA Online Loan Application experience. The online applicant will be provided the opportunity to upload supporting documents in either a front-end document repository or at logical, strategically located upload points throughout the online application process flow. Although burden hours are provided for the non-form collection components, the estimated burden hours are part of the overall burden hour estimate of 1.51 hours (1 hour, 31 minutes) per response.

### **Entity Information with Direct Loan Application**

7 CFR 764.51(b)(2)

Entities applying for agency loans must provide copy of the entity's charter, articles of incorporation and bylaws, evidence of current registration and a resolution adopted by the Board of Directors or entity members authorizing the entity to apply for and obtain the loan. Only new entities that have not obtained a loan from the agency are required to provide this information. Iowa has developed form FSA-2300-1 IA, Notice Agreement, for obtaining the required information. Oregon has developed form FSA-2000-1 OR, Addendum for Additional Signatories, for obtaining the required information. The respondents who complete the respective state forms are not required to provide any other additional information for this purpose.

Forms/Non-	Respondents	No of	Total responses	Hours per	Exempt	Total
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	format		responses per Respondents		responses	burden hours
Entity information - loan application	Non-form	5,900	1.00	5,900	0.25	1,475

### **Copy of Legal Description of Property to be Purchased, Leases, or Other Agreements** 7 CFR 764.51(b)(10)

As part of a complete application, the applicant must submit a copy of the legal description of the property to be purchased, leases for rented land or other agreements that are needed to effectively evaluate the loan request. For example, a copy of the lease is needed if the applicant is requesting a loan to finance improvements to leased land to ensure the term of the lease exceeds the proposed loan term. Additionally, a copy of the purchase contract is needed if the applicant is requesting a loan to purchase farm real estate. The legal description of the property to be purchased is needed for the agency to obtain the appraisal and file the security instrument. Applicants using the Online Loan Application will be asked if they have these documents available for upload.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Copy of legal description of RE to purchase, leases, agreements	Non-form	10,986	1.28	14,062	0.25		3,516

### **Documentation that Other Credit is Not Available**

7 CFR 764.51(b)(6)

A statutory eligibility requirement that must be met by applicants is that other credit at reasonable rates and terms, including a loan guaranteed by the agency, is not available. Applicants, including individual entity members, must submit documentation that other credit is not available. To obtain this documentation, the applicant must contact local agricultural lenders. Applicants using the Online Loan Application will be asked if they have this type of documentation available for upload. In some cases, FSA officials can make a determination on availability of credit elsewhere based on a review of the financial documents provided by the applicant. In such case, no additional documentation is required.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Documentation other credit is not available	Non-form	4,780	1.00	4,780	1.00		4,780

### **Citizenship Status Documentation**

7 CFR 764.101(c), 7 CFR 764.51(b)(13)

Applicants certify as to their citizenship status on FSA-2001 paper application form. Sections 302, 311, and 321 of the CONACT provide that applicants for agency loans must be United States citizens. Further, provisions of the Personal Responsibility and Work Opportunity Act of 1996 (8 U.S.C. 1611) require that recipients of Federal benefits be U.S. citizens, U.S. non-citizen nationals, or qualified aliens. Applicants who identify themselves as non-citizen nationals or qualified aliens must submit copies of supporting

documentation to establish their eligibility. The online applicant will select their status in the eligibility section of the Online Loan Application process. Depending on their selection, online applicants will be asked if they have supporting documents to upload.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Citizenship status documentation	Non-form	90	1.00	90	0.25		23

### Written Description of Training and Experience

7 CFR 764.51(b)(3)

Applicants for direct loan requests must provide a written description of their farm training and experience as part of a complete application. in a manner similar to the paper fSA-2001 application, the online applicant will select all applicable options provided regarding their training, education, and experience. Options selected, explanations entered, and supporting documents provided allow FSA to determine the applicant's eligibility across multiple loan types.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Training & Experience documentation	Non-form	9,560	1.00	9,560	.08		765

### Three-Year Financial History

7 CFR 761.104(c)(1); 7 CFR 764.51(b)(4); 7 CFR 766.102(a)(3)

FSA requires applicants to submit the last three years of financial records as part of a complete application for loan making requests. Loan applications submitted that meet Microloan criteria only need to provide financial records for the most recent production cycle. The financial records, primarily tax returns and living expense records, are used to ensure that the projected cash flow used to determine loan repayment is based on the actual financial history of the operation. The online applicant initially will only be able to upload actual financial records. Future enhancements may include ability for the online applicant to manually enter this information directly into the automated system.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Three-Year Financial History - existing applicants	Non-form	9,560	1.00	9,560	0.50		4,780
Three-Year Financial History - PLS	Non-form	1,246	1.00	2,491	0.50		623

#### **Three-Year Production History**

7 CFR 761.104(c)(3); 7 CFR 764.51(b)(5); 7 CFR 766.102(a)(4)

FSA requires applicants to submit the last three years of production records as part of a complete application for loan making requests. Loan applications submitted that meet Microloan criteria only need to provide production records for the most recent production cycle. FSA currently uses FSA-2003 as an option for applicants and borrowers to submit the required production history to the agency. FSA requires applicants to

submit the last three years of production records as part of a complete application for loan making requests. The production records are used to ensure that the projected cash flow used to determine loan repayment is based on the actual production history of the operation. The online applicant initially will only be able to upload actual production records. Future enhancements will include ability for the online applicant to manually enter this information directly into the automated system.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Three-Year Production History – Loan Making	Non-form	9,560	1.00	9,560	0.50		4,780
Three-Year Production History - PLS	Non-form	1,246	1.00	1,246	0.50		623

#### Verification of All Non-Farm Income

7 CFR 764.51(b)(8); 7 CFR 766.102(a)(6)

Applicants requesting a direct loan and borrowers primary loan servicing must provide verification of all non-farm income. FSA uses the non-farm income information to determine the applicant or borrower's repayment ability or other sources of income when considering the request. FSA currently has an option to use form FSA-2014 to obtain this information. The online applicant will have the opportunity to upload documents to verify their non-farm income. For the online applicant, the uploading of supporting documents will allow for no further documents required.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Verification of All Non- Farm Income - loan making	Non-form	19,119	1.93	36,900	0.08		2,952
Verification of All Non- Farm Income - PLS	Non-form	2,491	1.00	2,491	0.08		199

#### **Verification of All Debts**

7 CFR 764.51(b)(12); 7 CFR 7646.102(a)(8)

For an application to be considered complete, regulations require that debts be verified. Additional debt verification is not necessary when all needed information can be obtained from a credit report; however, credit reports do not provide information regarding the type and amount of security taken by the creditor. For the online applicant, the uploading of supporting documents to verify debts can allow for FSA to move forward with no further documents being necessary for verification.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Verification of All Debts - loan making	Non-form	19,119	1.93	36,900	.08		2,952
Verification of All Debts - PLS	Non-form	2,491	1.00	2,491	.08		199

A complete application for an FSA direct farm loan requires submission of payment for the required credit report fee. For the online applicant, the ability to pay their credit report fee online will be available. The online applicant will be asked to select their payment method and enter required banking / payment information in order for payment processing to occur.

	Forms/Non- format	Respondents	No of responses per Respondents	Total responses	Hours per responses	Exempt	Total burden hours
Credit report fee payment	Non-form	19,119	1.93	36,900	.05		1,845

### Collections contained in 7 CFR 764 approved under OMB Control Numbers for other CFR parts or OMB Control Numbers

The following table summarizes the information collections included in 7 CFR 764, for which approval has been obtained or requested under the OMB Control Number for another CFR part that requires the same collection of information for a difference purpose in OLA.

CFR	Description	Approved
citation		under
764.51	Financial information to process loan making request – In OLA	0560-0238
764.51	Production information to process loan making request- In OLA	0560-0238
764.51	Operating plan – In OLA	0560-0238
764.51	Copies of tax returns – In OLA	0560-0238
764.51	Evidence that environmental requirements have been met to	0575-0094
	process loan request (in OLA in the future)	

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

Information collections obtained using the FSA Online Loan Application will be submitted electronically provided the applicant has obtained and activated a USDA Level 2 eAuthentication account. It should be noted that future access to the FSA Online Loan Application may require a Login.gov account be established.

As part of the FSA Online Loan Application completion and submission process, applicants will follow a logical flow of components. These components include the following:

Operator Certification

Applicant Type

**Applicant Profile** 

**Operation Profile** 

Certification

Loan Purpose & Amount \*

Eligibility - Credit Elsewhere \*

Eligibility - Credit History

Eligibility - Training, Education, and Experience \*

Eligibility - Citizenship \*

Current Balance Sheet \*+
Actual Financial Records \*
Actual Production Records \*
Farm Operating Plan \*+
Application Review
Notification & Disclosures
Authorizations & E-Signature
Credit Report Fee

- \* includes upload functionality of non-form documentation
- + upload functionality allows online applicant to bypass this component

As the applicant progresses through the FSA Online Loan Application experience, information provided in response to a series of questions will populate the FSA-2001. The populated FSA-2001, any documents generated by the FSA Online Loan Application, and any supporting documents uploaded by the online applicant will be available for review by authorized FSA Agency officials.

Non-form information collections require providing copies of documents in the applicant's possession or providing written replies to agency requests. Non-form collections may additionally be submitted in person at the local agency office, by mail, or by facsimile. Further, applicants with established Level 2 accounts may provide non-form information collections as any kind of non-executable attachments, such as PDF, doc, xls, or text formats.

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

The burden established in this regulation is required under the provisions of the CONACT, which mandates specific actions be taken when making loans to FLP applicants.

FSA FLP personnel with expertise in making loans have reviewed the information collections required under this CFR part to eliminate any duplicative or unnecessary collections of information. The information contained in this collection is made part of the case file and, when reasonably current, may be used in lieu of re-submission by the applicant. However, financial information that is collected at another time may be dated and not useful for the specific action being considered. Various program areas within the agency share data; however, information collections established in this regulation would typically not be available from another agency. Therefore, the potential to share data with other USDA agencies is limited.

5. Methods to minimize burden on small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods to minimize burden.

FSA has made every effort to minimize burden on small businesses and small entities. FSA only requires collection of information when necessary to act on an applicant or borrower's request for assistance. The information required by this regulation is financial in nature and similar to that required to complete Federal tax returns, make business decisions, or to obtain a loan from any commercial lender. Thus, it places no additional burden on small businesses above that required in the normal course of business. There are about 2,593 small businesses or entities.

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

Since FSA is mandated to provide supervised credit, failure to collect the information, or collecting it less frequently, could result in the failure of the farm operation or loss of FSA security property. The collection of information is required as a result of an applicant's specific request, is obtained on an as-needed basis, and is used to document the applicant's eligibility for the requested loan. Accurate decisions when making a loan depend on current financial information, actual production history, and potential of the farming operation in order to carry out the program as intended. There is no regular reporting schedule related to the information collection requirements in this CFR part. If the information were not collected, or collected less frequently, FSA would be unable to meet the congressionally mandated mission of the loan programs.

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

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

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

The Federal Register notice for 60-day comment period was published on July 21, 2023 (88 FR 47102). There was (1) one comment received on all aspects of the collection. Comments provided during the 60-day period were:

For agricultural projects, we are requesting funding of \$3 million for this project.

This project must contain: the cultivation of rice in an area of ten hectares and for the cultivation of wheat in ten hectares and finally, the cultivation of food self-reliance or cultivation of corn, cassava.

In addition, my name is Gakozi Martin Valentin and the Legal Representative of Agape Restoration Community Society Burundi and the Great Lakes.

For these projects, we also need agricultural machines, harvester and huller.

For Agape Restoration Community Society/Burundi

Martin Valentin Gakozi Legal representative

FSA maintains close contact with borrowers through FSA's general field representatives (GFR) and a headquarters' staff. GFR's have direct personal contact with the applicants in connection with the fulfillment of FSA requirements. GFR's pass on any substantive comments to the headquarters staff. Staff is readily available to assist/help the Agency's customers. FSA works closely with lending institutions and a

nationwide network of lending institutions as part of the Farm Credit System, which provides supplemental loan funds to borrowers.

The following individuals were consulted regarding this information collection. Any comments provided are provided below name, if received:

### Matthew Sperry - 605-824-4144

Comments: Experienced an issue after login with error message appearing. Individual commented the system was fairly user friendly and liked the ability to build a balance sheet within the system. Recommended that an option be provided to build a farm operating plan and ability to manually enter financial & production history information. Also recommended ability to pull in existing FSA farm loan information.

### Lexy Lynn - 605-690-9253

Comments: Experienced slight issue with uploading a certain file type.

#### Cecil Quinn - (423) 257-3481

Comments: System will be beneficial, especially for those who use computers frequently.

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

There are no payments or gifts provided to respondents.

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

FSA forms that serve as collection instruments contain a Privacy Act statement identifying circumstances under which the information collected may be released. This statement is based on the Privacy Act, the Freedom of Information Act and the Agency's System of Records that has been published in the <u>Federal Register (84 FR 10775-USDA-FSA-14, Applicants/Borrowers)</u>. Agency policies, as well as a copy of the System of Records, are published in FSA handbooks 2-INFO and 3-INFO. No further assurance of confidentiality is provided to applicants or borrowers.

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

The information collected is of a financial nature. As a condition for the receipt of program benefits, respondents must provide total disclosure of income data and a history of their business dealings that is often considered sensitive. Regardless, the information is required to properly document FSA's decision pertaining to Direct loan making and Direct loan servicing actions.

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

The estimate of hour burden of the information collections is as follows:	
Total Number of Unduplicated Respondents	.21,610.
Reports Filed Per Person	.1.82.
Total Annual Responses	.39,330.

Total Annual Burden Hours......59,389.

Documentation to support these figures includes:

HISTORICAL DATA				
Total # of Direct Loan Making requests (all types) received from Fiscal Year 2018 through Fiscal Year 2022	167,463			
Total # of Direct Loan Making applicants (all types) submitting applications from Fiscal Year 2018 through Fiscal Year 2022.	86,905			
Average # of Direct Loan Making requests received from Fiscal Year 2018 through Fiscal Year 2022	33,493			
Average # of applicants submitting Direct Loan Making requests from FY 2018 through Fiscal Year 2022	17,381			
Average # of Direct Loan Making requests submitted per applicant from Fiscal Year 2018 through Fiscal Year 2022	1.93			

ESTIMATES				
Expected increase in Direct Loan Making requests due to ease of access & submission using FSA Online Loan Application	10%			
Average # of applicants submitting Direct Loan Making requests from FY 2018 through Fiscal Year 2022 + 10% increase	19,119			
Average # of Direct Loan Making requests submitted per applicant	1.93			
Average # of Direct Loan Servicing requests received from Fiscal Year 2018 through Fiscal Year 2022 (no expected increase)	2,491			
Average # of Direct Loan Servicing requests submitted per applicant	1.0			
Total Estimated # of Respondents for Direct Loan Making and Direct Loan Servicing requests combined	21,610			

### Weighted Average Calculation for Average Response per Respondent

19,119 Direct Loan Making requests x 1.93 = 36,900 2,491 Direct Loan Servicing requests x 1.0 = 2,491

Total = 39,391

**Total Annual Responses Estimated** 

39,391 responses / 21,610 respondents = 1.82 (loan making & loan servicing combined)

 $21,610 \times 1.82 = 39,330$ 

AVERAGE RESPONSE TIME					
Type	Formula	# of Responses	Burden	Total	
Direct Loan Making &	39,330 x .5	19,665	1.3 hours	25,565	
Direct Loan Servicing					
– Individual (50%)					
Direct Loan Making &	39,330 x .35	13,765.5	1.60 hours	22,025	
Direct Loan Servicing					
Married Couples (35%)					
Direct Loan Making &	39,330 x .15	5,899.5	2.00 hours	11,799	
Direct Loan Servicing					
Entities (15%)					
Total		39,330		59,389	

59,389 Total Hours / 39,330 Total Responses = 1.51 hours per response

Based on estimated burden hours for non-form documentation, the overall burden hours for the FSA Online Loan Application is nearly a 50/50 split between the online application process flow completion and non-form supporting documentation gathering.

Respondent cost per hour was derived by using U.S. Bureau of Labor Statistics Occupational Employment and Wages, May 2022. Table 11-9013-Farmers and Ranchers, and Other Agricultural Managers. The U.S. mean hourly wage for this group is \$38.63 hourly and \$80,360 annually, as measured by the Bureau of Labor.

Respondent cost per hour was derived by using U.S. Bureau of Labor Statistics Occupational Employment and Wages, May 2022, Table 13-2072-Loan Officers. The U.S. mean for loan officer's income, as measured by the Bureau of Labor is \$76,200 annually or \$36.64.

Also, a total employer compensation costs (fringe benefits) for all workers averaged \$11.47 per hour worked from Bureau of Labor Statistics website, specifically in the document of the private employer costs for employee compensation, June 2022.

The estimate of respondent costs for the information collections is in total of \$5,832,555.

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

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

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

Averaging the GS-9 through GS-12 (2023 RUS-Salary Table) salaries indicates an average employee salary of \$78,186.13 per year. Standard adjustments recommended by FSA's Budget Division of 33.3% are added for benefits and miscellaneous expenses (\$25,801.43), for a total average cost for a Farm Loan Program employee salary of \$103,988 per year, which divided by 2087 hours equals an hourly salary of \$49.83.

Therefore, the estimated annual cost to the Federal Government is:

39,330 responses X \$49.83 = \$1,959,814.

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

This is a new request.

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

The information collections required under this regulation will not be tabulated or published.

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

The OLA will display the OMB expiration date.

### 18. Explain each exception statement to the certification statement.

There are no exceptions requested.