

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

- 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.**

Information collection is required by 2 CFR Parts 200 and 400. For assistance agreements awarded on or after December 26, 2014, 2 CFR Part 400 implements OMB regulations in 2 CFR Part 200. These regulations include only those provisions mandated by statute or added by USDA to ensure sound and effective financial assistance management. These regulations set forth pre-award, post-award, and after-the-grant requirements. This information is needed by FAS project officers, grant specialists, program coordinators, managers, and finance officials to manage/oversee recipient programmatic and financial performance under FAS assistance agreements.

- 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.**

Pre-award information is used by FAS personnel to qualify and select assistance agreement applicants for funding. Post-award reporting is used by FAS personnel to make amendments to established assistance agreement awards, to make payments pursuant to such awards, and to verify that the recipient is using Federal funds appropriately to comply with applicable Federal and agency requirements. The information is necessary to ensure minimum fiscal control and accountability for award funds and to deter waste, fraud, and abuse.

- 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 (item 13b1 of OMB form 83-i).**

Electronic submission is enabled and encouraged using the USDA ezFedGrants system at <https://grants.fms.usda.gov> however, use of the system is not mandatory – applicants and recipients are permitted to submit materials outside of the ezFedGrants system without penalty, provided only that the same deadlines are met.

- 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.**

There is no other source for the information sought.

- 5. Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.**

Inasmuch as small businesses or other small entities apply to NARETPA grant and/or cooperative agreement programs, they are required to meet the same requirements. USDA offers assistance to all entities, upon request, to understand how to collect, compile, and provide the information requested correctly and completely; and provides opportunities to cure in instances where errata are clearly clerical in nature. We estimate that approximately 1% of small businesses participate.

- 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.**

Without the data compiled, it would be impossible for FAS to manage any of its Federal assistance programs. Rational, fair grant and cooperative agreement awards would be extremely difficult to make, and financial and technical managerial information would not be available for assessing the status of grant and cooperative agreement efforts. Decreasing the frequency of data collection would have similar negative impacts.

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

- requiring respondents to report information to the agency more 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 than can be generalized to the universe of the study;
- requiring the use of 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. Identify the date and page number of the *Federal Register* notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain them.

FAS published a 60-day Notice of Proposed Information Collections for public comments in the Federal Register, Volume 88; Page 55996 on August 17, 2023. The public was given until October 16, 2023, to submit comments on the proposed information collection. FAS received 1 comment on this proposed collection. No response was provided as the comment did not apply to the actual collection of information.

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 spoke directly to several of the organizations that are among the largest applicants and recipients under these programs, and received the following feedback. No changes were made as a result of the feedback, as FAS did not identify any proposed efficiencies that would, if implemented, have a nonnegative impact on program implementation and/or FAS' responsibilities for management and oversight.

Kirk Shirley, Head of Strategic Partnerships – Americas, CAB International

It is worth noting that there is quite a bit of variance between proposals, and CABI suspects some entities have different processes that have less or more eyes on proposals. CABI for example has a very formal internal process for drafting, reviewing, verification with internal controls and mission, and approving proposals and associated documents before they can be submitted, so lots of people involved. CABI also notes that FAS is not the worst nor the best, somewhere in the middle, even compared to other USDA agencies (APHIS, ARS, NIFA, FS, etc.). For example, CABI probably spent a combined 250 hours on their last USDA/NIFA narrative. CABI estimates that it takes 90 hours on average to write, edit, and submit a project narrative; 20 hours on average to write, edit, and submit a budget narrative; and 30 hours on average to write, edit, and submit a performance report; at an average cost of \$30/hour.

Sean Lawrie, Associate Director, Visiting International Professional Program, Michigan State University

The project narrative comes from the faculty, and some programs different numbers of moving parts and often times involving external partners. Much communication is necessary and it is common for changes to be made all the way to submission based on program personnel/facility availability. The faculty I work with are usually able to crank this out pretty quickly and I would be shocked it was more than 1-2 full work days (8-16 hours), plus maybe say 30-90 minutes for editing and the non-technical language that is included in a proposal.

I do the heavy lifting on the budget and budget narrative, and would say takes me around 2-4 hours for both. This would also include time needed for any edits after the Office of Sponsored Programs does its review. The airfare, per diem, and lodging is very quick and easy and the parts that take the most time are personnel costs (salary and fringe), laboratory supplies & materials, or more unusual things like facility usage and university vans needed for the entire time so mileage needs to be sorted out.

It takes no more than a few minutes to complete a performance report, however, that is because I typically do not include much detail in the bi-annual progress reports. I have always operated on the premise (with some feedback from FAS program personnel awhile throughout) that an excessive amount of detail is not expected in the progress reports and that the final report is the key. I suspect that other universities might include more detail (certainly nothing wrong with that and perhaps this is what is preferred now) but I would be shocked if this took more than 1 hour for anyone, including the feedback offered by the faculty.

For many of these programs, the only personnel involved in these activities are the coordinator (\$26-35/hour) and the technical lead (\$35-87/hour).

Jeri Lou Zimmerman, Director of Grants Office, University of Missouri College of Agriculture

I'm just going to say it off the top...It depends on:

- Which project (some are simpler or more complex than others).
- How involved they are.
- How long Sponsored Programs wants to argue about something during their review.

That being said, our information below is for Training and Technical Assistance Projects. This includes the programmatic people's information, my processing through Sponsored Programs Submission as revise/submission, then the total.

- 31 total hours for the project narrative
- 12 total hours for the budget narrative
- 9 total hours for the performance progress reporting
- Average hourly rate of pay for personnel concerned is \$36.96

José Urdaz, AHFS Manager, InterAmerican Institute for Cooperation on Agriculture

- 20-27 hours for the project narrative
- 15-23 hours for the budget narrative
- 11-12 hours for quarterly reports

Dr. Urdaz did not provide information regarding the cost of staff time.

FAS notes the wide range of time burdens among respondents, which may be worth future study; although the cost information is, broadly speaking, more consistent.

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

This information collection activity involves no payments or gifts to respondents.

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

No pledge of confidentiality is given for applicant responses; however, as a practical matter, FAS does not release the content or any other details of non-selected applications.

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.

There are no questions of a sensitive nature associated with 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. Read the complete instructions on the form 83i.

The precise burden inherently varies from year to year based on the number of applicants; the number of awards awarded that year; the number of awards awarded in previous years that remain active; the frequency with which recipients choose to submit claims; and the number of requests for extension, supplemental funds, or other amendments submitted by recipients.

For purposes of calculation, FAS referenced fiscal year 2019 (the most recent complete "normal" program year) and noted that 243 award actions were issued to 80 unique recipients. Although FAS does not systematically track applications received, the agency believes a reasonable estimation is that it receives 2 applications for each award issued, and that 4/5 of applicants are, at one time during the period, selected for at least one award; for a total of 486 application packages from 100 applicants, each of which has four (4) required documents: The SF-424, the SF-424A, the Project Narrative, and the Budget Narrative.

Regarding claims, FAS queried its grants management system and found that in fiscal year 2019 (the most recent complete "normal" program year), 735 claims were processed from 98 unique organizations, an average of 7.5 claims per organization (although individual recipients submitted a minimum of 1 and maximum of 45 claims during the period, based on the number of awards held, the volume of activities under those awards, and the accounting procedures in place at each organization).

Regarding post-award reporting, FAS queried its grants management system and found that in calendar year 2019 (the most recent complete “normal” year), 592 financial reports and 598 performance reports were submitted from 99 unique organizations. (The reporting cadence varies by award; although in most cases performance and financial reports follow the same cadence, this is not necessarily required.) This calculates to an average of 12.02 reports per organization (although individual recipients submitted a minimum of 2, and maximum of 73 unique reports during the year, based on the reporting cadence specified in each award). This calculation uses the calendar year rather than fiscal year due to the way the data are reported in the grants management system, but FAS has no reason to believe the figures are not comparable.

For government-wide standard forms SF-270, SF-424, SF-424A, and SF-425, the burden listed reflects the estimate projected in the corresponding approval for those forms. FAS notes that, from anecdotal conversations with applicants and recipients, the time estimation for those forms is excessive, and adopts here a more reasonable estimation for those forms.

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
Project Narrative	100	4.86	486	30	14,580	\$35	\$510,300
Budget Narrative	100	4.86	486	15	7,290	\$35	\$255,150
Performance Report	99	6.04	598	12	7,176	\$35	\$251,160
Totals	100		1,570		29,046		\$1,016,610

**Cost includes fringe benefits*

Average hourly cost is estimated at approximately \$35 for participants. This hourly cost is based on specific feedback from queried participants, which is not inconsistent with FAS’ internal projected calculation. The total annual estimated burden in dollars is \$1,016,610 and includes fringe benefits.

13. Estimate of the annual cost to respondents or recordkeepers (do not include the cost of hour burden shown in Items 12 and 14). Read the complete instructions on the form 83i.

14. Estimate annualized costs to the Federal government.

Information Collection	Number of Respondents	Number of Responses per Respondents	Total Annual Responses	Burden Hours/Minutes per Response	Total Government Burden Hours	*Government Hourly Cost	Total Government Annual Costs
Project Narrative	100	4.86	486	3.0	1,458	\$62.26	\$90,775
Budget Narrative	100	4.86	486	1.5	729	\$62.26	\$45,388
Performance Report	99	6.04	598	0.5	299	\$62.26	\$18,616
Totals	100				2,486		\$154,779

**Cost includes fringe benefits*

The annual estimated cost to the Federal Government for this collection is \$154,779. Average hourly cost is estimated at \$62.26 per hour, based on the weighted average cost for the staff assigned to review information submissions. The hourly costs used in the estimate includes fringe benefits. Feedback from staff indicates that the formal process of reviewing submitted documents is generally quite expedient in large part because staff are engaged on a regular basis with recipients, i.e. such that the contents are usually within expected parameters.

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

This is an existing information collection in use without a valid OMB Control No.

16. If the information will be published, outline plans for tabulation and publication.

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.

We are not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions.