

**2023 SUPPORTING STATEMENT
PAPERWORK REDUCTION ACT SUBMISSION
RURAL COOPERATIVE DEVELOPMENT GRANT PROGRAM
OMB NO. 0570-0006**

A. Justification

1. Circumstances that make the collection of information necessary.

Public Law 115-334, Section 310B of the Consolidated Farm and Rural Development Act (as amended), authorizes the Rural Cooperative Development Grants (RCDG) program to be administered by Rural Business-Cooperative Service (RBCS). RBCS must collect information from applicants in order to confirm eligibility for the program and to evaluate the quality of the applications. Additionally, grantees are required to submit reporting and payment request information to facilitate monitoring of the program and disbursement of funds.

2. Indicate how, by whom, and for what purposes 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.

Information is collected by RBCS and Rural Development (RD) State and Area office staff, as delegated, from applicants and grantees. The application information is used to confirm that the applicant and use of funds meet the eligibility requirements for the program as well as to assess the quality of the proposed project. The grantees are required to submit financial status and performance reports to confirm funds are being expended as approved and requests for advance or reimbursement to request payment.

INFORMATION COLLECTION BURDEN HOURS

Application

- (1) SAM Registration.** To do business with the Federal government, the applicant is required to obtain a Unique Identification Number (UEI) and register in the System for Award Management (SAM). Registration in SAM allows the applicant to complete the Online Representations and Certifications which replaces several paper forms. The registration must be updated annually.
- (2) Project Proposal (Non Form).** This narrative is submitted by the applicant to provide information that the Agency uses to assess the eligibility of the applicant organization, use of funds and to evaluate the quality of the proposed project.
- (3) Environmental Requirements (Non Form).** Applicants must comply with 7 CFR part 1970. Applicants for grant funds must consider and document within their plans the important environmental factors within the planning area and the potential environmental impacts of the plan on the planning area, as well as the alternative planning strategies that were reviewed.

Award Closing, Servicing, and Reporting

- (1) Letter of Intent to Meet Conditions (Form RD 1942-46).** At the time of award the grantee will complete this form so that the Agency can ensure that the grantee is aware of

the conditions of the award and that the grantee intends to meet them within a reasonable time.

- (2) **Request for Obligation of Funds (Form RD 1940-1).** At the time of award the grantee will complete this form so that the Agency may obligate funds.
- (3) **Grant Agreement (Non Form).** At time of grant approval, this document is signed by the grantee and the Agency to enter into a legally binding contract. It provides the terms of the award in accordance with applicable regulations as well as any special conditions that may apply.
- (4) **Potential Conflicts of Interest (Non Form).** At the time of award, the grantee must disclose in writing any potential conflicts of interest and maintain written standards of conduct covering conflicts of interest, including organizational conflicts of interest in accordance with 2 CFR 400.2.
- (5) **Financial Management System (Non Form).** The grantee will be required to maintain a financial management system acceptable to the Agency.
- (6) **Beneficiary Data (Non Form).** The grantee will be required to collect and maintain data on race, sex, and national origin of the beneficiaries of the project.
- (7) **Performance Report (Non Form).** The grantee must complete on a semi-annual basis. Semi-annual performance reports that compare accomplishments to the objectives stated in the proposal. Identify all tasks completed to date and provide documentation supporting the reported results. If the original schedule provided in the work plan is not being met, the report should discuss the problems or delays that may affect completion of the project. Objectives for the next reporting period should be listed. Compliance with any special condition on the use of award funds should be discussed. Reports are due as provided in 7 CFR part 4284. The supporting documentation for completed tasks include, but are not limited to, feasibility studies, marketing plans, business plans, articles of incorporation and bylaws.
- (8) **Final Project Performance Report (Non Form).** The grantee must complete within 30 days of the completion of the project. This narrative is completed by the grantee and used by the Agency to confirm that the approved objectives and tasks of the project were completed. Quantitative information (e.g. jobs created, businesses assisted) may also be used to assess the success of the program.
- (9) **Project Outcome Performance Report (Non Form).** The recipient, once the project is complete, must provide the Agency with two annual outcome performance reports.
- (10) **Audit Requirements (Non Form).** Grantees must comply with the audit requirements of 2 CFR part 200 as adopted by USDA in 2 CFR part 400. The audit requirements apply to the years in which grant funds are received and years in which work is accomplished using grant funds.
- (11) **SAM Registration Maintenance.** Each applicant (unless an exception, as outlined in 2 CFR 25.110(a) through (d), is approved by the Agency) is required to maintain an active SAM registration with current information at all times during which it has an active Federal award. The Agency uses the SAM site to ensure continued eligibility to receive Federal financial assistance.
- (12) **Recordkeeping Requirements.** USDA Administrative Requirements require that financial records, supporting documents, statistical records, and all other records pertinent to the award will be retained for a period of at least 3 years after the period of performance

has ended. Records must be retained beyond 3 years if audit findings have not been resolved.

INFORMATION NOT INCLUDED IN BURDEN HOURS

- (1) **Application for Federal Assistance (Form SF-424, OMB 4040-0004).** This form is submitted by the applicant at the time of application and is used as a required cover sheet for federal grant programs.
- (2) **Budget Information for Non-Construction Programs (Form SF-424A, OMB 4040-0006).** This form is submitted by the applicant at the time of application and used to collect the budget information for the project.
- (3) **Disclosure of Lobbying Activities (Form SF-LLL, OMB 0348-0046).** This form is submitted by the grantee at the time of grant award and used by the Agency to obtain disclosure of lobbying activities on the part of the grantee.
- (4) **Assurance Agreement (Form RD 400-4, OMB 0575-0018).** This form is submitted by the grantee and used by the Agency to ensure that the grantee is in compliance with Title VI of the Civil Rights Act of 1964.
- (5) **ACH Vendor/Miscellaneous Payment Enrollment Form (Form SF-3881, OMB 1530-0069).** This form is submitted by the grantee at the time of grant award and is used by the Agency to set up electronic payments for the grant.
- (6) **Request for Advance or Reimbursement (Form SF-270, OMB 4040-0012).** This form is submitted by the grantee no more frequently than monthly to request advance or reimbursement of grant funds obligated under the grant agreement.
- (7) **Federal Financial Report (Form SF-425, OMB 4040-0014).** This form is submitted by the grantee on a semi-annual basis until the project is complete so that the Agency can confirm that funds are being expended as approved.

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.

RBCS strongly encourages applicants to submit as much material as possible electronically. Applicants may apply for grant funds via www.grants.gov, and the Agency is able to retrieve the applications electronically. Applicants who receive funding are encouraged, but not required, to submit semi-annual and final reports electronically.

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

RBCS makes every effort to administer programs using the standard forms where possible; however, progress reports are unique to the projects administered under each grant. Rural Development has several grant programs that are similarly administered. If there is simultaneous participation in more than one program, RBCS would make every effort to accommodate the requests within the same set of applications and processing forms.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 82-I), describe any methods used to minimize burden.

The information collected is the minimum needed by RBCS to approve grants and monitor grant performance. No additional methods are used to minimize the burden for 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 burden.

Without collecting the information, RBCS cannot be assured that the applicants meet the statutory requirements for eligibility, that it is awarding funds to qualified applicants, and that grantees are providing services in accordance with the approved grant agreement.

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

- a. **Requiring respondent to report information more than quarterly.**
There are no information requirements that require reporting on more than a quarterly basis.
- b. **Requiring written responses in less than 30 days.**
There are no information requirements for written responses in less than 30 days.
- c. **Requiring more than an original and two copies.**
There are no information requirements for more than an original and two copies.
- d. **Requiring respondents to retain records for more than 3 years.**
There are no requirements to retain records for more than 3 years, unless an audit finding has not been resolved.
- e. **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.**
There are no requirements for the use of a statistical survey.
- f. **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**
There are no requirements for the use of a statistical data classification that has not been reviewed and approved by OMB.
- g. **Requiring 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.

There is no requirement for a pledge of confidentiality.

- h. 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 is no requirement for submission of proprietary trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. 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, reporting, format (if any), and on data elements to be recorded, disclosed, or reported.

RBCS published a notice requesting comment on the extension of the previously approved information collection for the RCDG program (see 88 FR 82314, November 24, 2023). The 60-day comment period closed January 23, 2024 and there were two (2) requests for additional information that the Agency responded to. No other comments were received during the 60-day comment period.

In addition, the Agency contacted the following individuals at organizations that have participated in the program in the past to obtain their feedback on the amount of time needed to prepare a proposal and performance reports.

California Center for Cooperative Development

- 979 F Street, Suite A, Davis, CA 95616
- Executive Director, 530-297-1032
- Executive Director expressed that the application process is a lot of work and not easy. There are a lot of questions and expectations, but not much duplication.

Keystone Development Center

- Headquarters, Ephrata, PA
- Cooperative Development Director, 717-792-2163
- Cooperative Development Director expressed that the application process is hard and quite a burden due to having to apply each year. The Director expressed duplication of the process when applying for other grants like with the SDGG program.

North Dakota Association of Rural Electric Cooperatives

- 3201 Nygren Drive NW, Mandan, ND 58554-0727
- Rural Development Director, 800-234-0518
- Rural Development Director expressed that the application process is difficult. For a small rural center, it is an inordinate amount of work and duplication. It was indicated that the time spent tracking and reporting after the application process is a lot. The ten letters of support each year seems to be a lot.

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 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.

No assurance of confidentiality was provided to respondents.

The Agency published a Privacy Act of 1974; System of Records in the Federal Register on May 14, 2019 (84 FR 21315). A copy of that document can be found at <https://www.govinfo.gov/content/pkg/FR-2019-05-14/pdf/2019-09874.pdf>.

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

There is no collection of any information that would be considered sensitive in nature or commonly considered private.

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

Table 12.1, Total Cost of Burden, shown below summarizes the estimated average annual burden associated with the RCDG program. The attached Burden Hours workbook provides an Information Collection Burden Hours worksheet that details the estimates.

Table 12.1 - Total Cost of Burden

Burden Item	Estimated Yearly Average Burden
Number of Respondents	41
Number of Awards:	30
Annual responses:	543
Total hours:	7,449
Cost per hour:	\$69.75
Total annual cost:	\$519,573

The attached Burden Hours workbook provides an Estimated Professional Wage Rate worksheet that shows the detailed calculation for the weighted wage rate of \$69.75 cost per hour above. The U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Statistics, May 2023 Occupation Profiles ([List of SOC Occupations \(bls.gov\)](https://www.bls.gov/occupations/)) was used to obtain the Mean Hourly Wage for each position identified. Table 12.2 provides the two (2) positions

identified for this calculation along with each Occupation Codes and Mean Hourly Wage. The benefits for each position was calculated by using the total benefits percentage of 29.6% for private industry workers from the U.S. Department of Labor, Bureau of Labor Statistics, Economic News Release, Employer Costs for Employee Compensation – December 2023 ([Employer Costs for Employee Compensation - 2023 Q02 Results \(bls.gov\)](https://www.bls.gov/news.release/empcost.pdf)).

Table 12.2 – Mean Hourly Rates per Position

Position	Occupation Code	Mean Hourly Wage
General & Operations Manager	11-1021	\$59.07
Management Analysts	13-1111	\$50.32

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

There are no capital/start up or operation/maintenance costs associated with this collection.

It is anticipated that wet signatures will be required on the legal documents for the awards. The program is estimating approximately 30 awards under RCDG. The United States Postal Service charges \$9.95 to ship a legal, flat rate envelope. Using this as a basis, the total estimated burden for returning the legal documents is \$9.95 per awardee or \$298.50.

14. Provide estimates of annualized cost to the Federal government.

The estimated Annualized Cost to the Federal Government is \$876,030, which is summarized in Table 14.1 below. The attached Burden Hours workbook provides an Annualized Cost to the Federal Government worksheet that details the following:

- Four (4) Review Steps
- Staff Positions for each Review Step.
- Calculated Wages Rates for each Staff Position.
- Number of hours required for each Staff Position.
- Total Cost for each Staff Position, Review Step and to the Federal Government.

Table 14.1: Total Cost to the Federal Government

Review Step	Cost of Each	Number of Responses	Total Cost
Step 1: Application	\$3,958.78	41	\$162,310
Step 2: Application Review	\$14,509.66	41	\$594,896
Step 3: Grant Award	\$2,487.93	30	\$74,638
Step 4: Post Grant Award	\$1,472.88	30	\$44,186
Total Cost to Federal Government	\$22,429.25		\$876,030

Review Steps. Brief explanation of the four review steps below:

- *Step 1: Application* – Agency review of the RCDG Program. RBCS expects 41 applications to be submitted for review.

- *Step 2: Application Review* – Agency review of the RCDG Program. RBCS expects 41 applications to be submitted for review.
- *Step 3: Grant Award* – Agency review of RCDG Program RBCS expects that 41 applications will be reviewed and 30 will be awarded.
- *Step 4: Post Grant Award* – Agency review of RCDG Program. RBCS expects that 30 projects will be awarded and administered over the grant period.

Staff Positions, GS Salary, and Total Salary Rate Calculated. Table 14.2 below provides the staff positions used for the Review Steps along with each Staff Positions General Schedule (GS) Grade, Step and Salary. The GS Salary was obtained by using Tables 2024-DCB ([Pay & Leave : Salaries & Wages - OPM.gov](#)) from the U.S. Office of Personnel Management (OPM), Policy, Pay & Leave, Salaries & Wages.

Table 14.2: Staff Positions and GS Salary

Staff Position	GS Grade	GS Step	GS Salary
Program Analyst	13	5	\$133,692
Loan Specialist	12	5	\$112,425

The Agency calculated the Hourly Rate by dividing the GS Salary by 52 weeks a year and then dividing that result by 40 hours per week. The benefits for each position was calculated by using the civilian position full fringe benefit cost factor of 36.25% from the Office of Management and Budget (OMB) Memorandum for the Heads of Executive Departments and Agencies (M-08-13) dated March 11, 2008 ([Memorandum for the Heads of Executive Departments and Agencies \(whitehouse.gov\)](#)).

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

The number of hours has been increased from 7,264 to 7,449. The burden items and estimated number of hours per response was updated to better represent what occurs with the program. In addition, the professional wage rate was updated using the most current data, which also increased the total burden cost from \$328,896.56 to \$519,573.

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

The results of this collection of information will not be published.

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.

These forms are used in other Rural Development information collections; therefore, it is not practical to include an OMB expiration date because of the different expiration dates for each collection. RBCS is seeking approval to not display the OMB expiration date on these forms.

18. Explain each exception to the certification statement identified in Item 19 on OMB 83-

1.

No exceptions are requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection of information under this Program does not and is not expected to employ statistical methods.