### **Supporting Statement for**

### **Uniform Grant Application for Non-Entitlement Discretionary Grants**

#### (OMB Control Number 0584-0512)

Grants and Fiscal Policy Division

Food and Nutrition Service, USDA

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- **1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.**
- A2. PURPOSE AND USE OF THE INFORMATION.
- A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.
- A4. EFFORTS TO IDENTIFY DUPLICATION.
- A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.
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- A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.
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- A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.
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- A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.
- A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.
- A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.
- A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.
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#### **Appendices**

#### Appendix:

- A: Program RFA's A1 through A62
- B: FPRS Homepage with Public Burden Statement and Expiration Date
- C: SORNS USDA e-Authentication Service
- D SF-424A

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D-5	SF-LLL
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D-7	SF-424
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E:	Detailed Burden Table
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F-10	Public Comment #10 (Jacobson)
F <b>-</b> 11	Public Comment #11 (Jacobson)

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The information collection is a revision package for all non-entitlement competitive and noncompetitive discretionary grant programs to collect information from grant applicants. The Food and Nutrition Service (FNS) has a number of non-entitlement discretionary grant programs. The term "grant" in this submission refers only to non-entitlement discretionary grants or cooperative agreements. Discretionary grant announcements include a number of information collections, including a "project description" (program narrative), budget information, and disclosure of lobbying activities certification. The budgetary information (SF-424 series) and the lobbying certification (SF-LLL) forms are pre-approved by the Office of Management and Budget (OMB) and therefore, do not require a separate approval. The SF-424 form family is approved by OMB (OMB Control Number 4040-0004, Expiration Date: December 31, 2022); however, reporting and recordkeeping burden hours associated with this form must be accounted for in each agency's information request packages.

The purpose of this revision to the currently approved collection for the Uniform Grant Application Package for Discretionary Grant Programs is to continue the authority for the established uniform grant application package and to update the number of collection burden hours, including noncompetitive grants issued by FNS into this information collection request package. FNS is revising the uniform collection package to allow and account for all of FNS' competitive and noncompetitive discretionary grant programs to collect information from grant applicants that are needed to evaluate and rank applicants and protect the

integrity of the grantee selection process. This revision also encompasses the submittal of associated State Plan information and the use of <u>program-specific</u> forms, including but not limited to, Form FNS-887 Farm to School Coversheet, the Farm to School Baseline Report, and the Farm to School Final Report.

The information in this collection is needed to evaluate and rank applicants and protect the integrity of the grantee selection process. All FNS competitive and noncompetitive discretionary grant programs would be eligible, but not required, to use this uniform grant application package. Before soliciting applications for a competitive or noncompetitive discretionary grant program, FNS will decide whether the uniform grant application package will meet the needs of that grant program.

If FNS decides to use the uniform grant application package, FNS will note in the grant solicitation that applicants must use the uniform grant application package, and the information collection has already been approved by OMB. If FNS decides not to use the uniform grant application package or determines that it needs grant applicants to provide additional information not contained in the uniform package, then FNS will publish at least a 30- day notice soliciting comments on its proposal to collect different or additional information before issuing the grant solicitation.

The uniform grant application package will include: General information and instructions; requirements for the program narrative statement describing how the grant goals, objectives, and outcomes will be reached, as well as a description of the

budget; the Standard Forms SF-424 series, and SF-LLL, which request basic information, budget information, and disclosure of lobbying activities certification, respectively. Grantees will also be required to submit Standard Form SF-425, Federal Financial Report form The proposed information collection covered in this request is related to the requirements for the program narrative statement which is described in 2 CFR Part 200, Appendix I (as supplemented by 2 CFR Part 400) and will apply to all types of competitive and noncompetitive awards to the following grantees: States and local governments, Indian Tribal Organizations (ITOs), Business for- and not-for-profit organizations, and Institutions of Higher Education.

FNS developed a Periodic Progress Report (FNS- 908) to allow the Agency to review and analyze project goals, objectives, and outcomes of FNS discretionary grants. FNS seeks approval of this form as well as other forms previously approved under the Farm to School supplementary information collection (see response in question 2).

The authorities for these grants vary. The legal or administrative authorities for the potential programs requesting use of this uniform grant application package are listed below:

### Grants and Cooperative Agreements w/ Legal Authority

Program	Name of Grant Project	Legislative Authority	RFA/Burden Appendix ID
CN	Team Nutrition Training Grants	"Section 6(a)(3) of the Richard B. Russell National School Lunch Act, 42 USC 1755(a)(3)"	A1, A3
CN	Farm to School Grants	"Section 18 of the Richard B. Russell National School Lunch Act, 42 USC 1769"	A4, A62, A51
CN	Technology Innovation Grants (TIGs)	"PL 116-94"	A5
CN	Direct Certification	The Child Nutrition and WIC Reauthorization Act of 2004, Public Law 108-265 [42 United States Code 1751 et. Seq]	A2
CN	Healthy School Meal Practices	"Consolidated Appropriations Act of 2021" (P.L. 116-260)	A61
CN	Child Nutrition American Rescue Plan Grants	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A40, A21
OPS			A8
OPS	Healthy School Meal Practices	Section 21 of the Richard B. Russell National School Lunch Act, 42 USC 1769d	A25
SNAP	SNAP Process and	"Section 11(t) of the Food and Nutrition Act of 2008, as amended"	A10, A49

	Technology Improvement Grant		
SNAP	SNAP Longitudinal Data Project	Section 29 of the Food and Nutrition Act of 2008 (7 U.S.C. 2036)	A12
SNAP	SNAP Data and Technical Assistance Grants	The Agriculture Act of 2014, Section 4022(a)(2)	А9
SNAP	Income Improvements and Verification Grants	"Consolidated Appropriations Act of 2021" (P.L. 116-260)	A55
SNAP	SNAP Fraud Framework	Section 29 of the Food and Nutrition Act of 2008 (7 U.S.C. 2036)	A11
SNAP	SNAP E&T National Partnership Grants	"Section 4022(a)(2) of the Agriculture Act of 2014"	A60
SNAP	SNAP American Rescue Plan (Misc)	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A41, A23
SNAS	Expanded Opportunities to transact FMNP benefits at farmers markets	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A31
SNAS	Modernize the	"Section 1106 of the American Rescue Plan	A46

	WIC Shopping Experience at the grocery store	Act (ARPA, P.L. 117-2)"					
SNAS	Grants to expand WIC CVB use at farmers' markets	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A31, A39, A44				
SNAS	Mobil Payment Grant	Payment "Section 1106 of the American Rescue Plan					
SNAS	Transform WIC business practices and implement technology tools that improve and streamline the participant experience. Planning Grants.	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A32, A34, A18, A43				
SNAS	American Rescue Plan	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A22,				
SNAS	Transform WIC business practices and implement technology tools that	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A32, A34, A18, A43				

	improve and streamline the participant experience. Implementatio n grants		
SNAS	Data matching, data sharing, interoperability project grants	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A17
SNAS	Implementatio n of Streamlining Tools	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A28
SNAS	Implementatio n of Prescreening Tools	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A29, A34
SNAS	Improve the WIC Shopping Experience at the grocery store	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A15
SNAS	WIC General Infrastructure Grants	"Section 17 of the Child Nutrition Act"	A14, A45, A36
SNAS	Farm to Food Bank Projects	"Section 4018(b) of the Agriculture Improvement Act of 2018"	
SNAS	TEAFP Reach and Resiliency	"Section 1001(b)(4) of the American Rescue Plan Act (ARPA, P.L. 117-2)"	Α7
SNAS	The Food	"PL 115-334"	A19, A48,

	Distribution Program on Indian Reservations Nutrition Education (FDPNE) Grant Program		A38, A6
SNAS	Senior Farmers Market	Section 1001 https://www.congress.gov/117/plaws/publ2/PLA W-117publ2.pdf	A26
SNAS	Center for Food Safety Research in Child Nutrition Programs (SNAS Office of Food Safety)	"Section 7 of the Child Nutrition Act (P.L. 111- 296)"	A52, A57
SNAS	Special Supplemental Nutrition Program for Women, Infants and Children - Breastfeeding	"PL 111-296"	A53
SNAS	Special Supplemental Nutrition	"Section 17 (h)(10)(III) of the Child Nutrition Act of 1966, as amended, authorizes funding for WIC special projects, which are intended to improve	A54

	Program for Women, Infants and Children - Special Projects	the delivery of program services and that demonstrate national or regional significance.	
SNAS	Special Supplemental Nutrition Program for Women, Infants and Children - Technology grants	"The Child Nutrition Act (P.L. 111-296)"	A56
SNAS	WIC General Implementatio n	"PL 111-296"	A20
SNAS	Institute of Child Nutrition Annual Food Safety Cooperative Agreement (SNAS Office of Food Safety)	"Section 7 of the Child Nutrition Act (P.L. 111- 296)"	A57
SNAS	Special Supplemental Nutrition Program for Women, Infants and	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A58

	Children – WIC online shopping TA and subgrantees		
SNAS	Special Supplemental Nutrition Program for Women, Infants and Children - Community innovation and outreach grant and subgrantees	"Section 1106 of the American Rescue Plan Act (ARPA, P.L. 117-2)"	A16, A59, A27

### 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review and evaluate the grant/cooperative agreement applications and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The selection criteria will be contained in the Request for Application (RFA) package. This process will occur only once each fiscal year for each grant program.

The following <u>grants.gov</u> forms are required of grant applicants. They are located at <u>http://www.grants.gov/web/grants/forms.html</u> Click Active Forms.

Non-Construction Grant Projects Forms: SF-424 Family:

- Application and Instruction for Federal Assistance (SF-424), OMB Control Number 4040-0004, Expiration Date: December 31, 2022
- 2. Budget Information and Instruction (SF-424A), OMB Control Number 4040-0006, Expiration Date: February 28, 2025
- Assurance-Non-Construction Programs (SF-424B), OMB Control Number 4040-0007, Expiration Date: February 28, 2025

The following required OMB form, SF LLL (Disclosure of Lobbying Activities), OMB Control Number 4040-0013,

Expiration Date: February 28, 2025, can be obtained at:

http://www.grants.gov/web/grants/forms.html.

The form is used to indicate whether the applying organization intends to conduct lobbying activities. If the organization does not intend to lobby, they can respond "**Not Applicable**."

Also, Standard Forms (SF), applicants awarded a grant will be required to submit on a quarterly basis, the following form: SF-425, Federal Financial Report, (OMB Control Number 4040-0014; Expiration Date: February 28, 2025). The Food and Nutrition Service (FNS) is requesting OMB approval to add the primary grant information collection: Farm to School Grant Program Request for Applications & The Farm to School Grant Program Application Cover Sheet to the list of approved grants. FNS intends to award grants to schools, school districts, non-profits, Indian Tribal Organizations, agricultural producers and State and local agencies to develop, implement, and evaluate robust farm to school projects in accordance with the mandate set forth Section 18 of the Healthy Hunger-Free Kids Act of 2010. The time it takes for these forms are included in the overall estimates for the RFA.

- 1. Farm to School Application Cover Sheet (FNS 887)
- 2. Grant Program Accounting System & Financial Capability Questionnaire (FNS 906)
- 3. USDA Farm to School Program Grantee Baseline Report
- 4. USDA Farm to School Program Grantee Final Report
- 5. USDA Farm to School Program Grantee Final Report
- 6. HMI Final Report\*
- 7. HMI Semi-Annual Progress Report\*

\*These two forms are in the process of being approved.

Form No.:	OMB control numbers:	Form No.	
SF-424	4040-0004	FNS-908	OMB control Numbers: 0584-0512

SF-424A	4040-0006	SF-LLL	4040-0013
SF-424B	4040-0007		
SF-424C	4040-0008		
SF-424D	4040-0009		
SF-425	4040-0014		

In the previous renewal, this collection contained the following AD forms:

- AD-3030 Representations Regarding Felony Conviction and Tax Delinquent Status for Corporate Applicants
- AD-1047 Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions
- AD-1048 Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion Lower Tier Covered Transactions
- AD-1049 Certification Regarding Drug-Free Workplace Requirements (Grants) Alternative I For Grantees Other Than Individuals
- AD-1050 Certification Regarding Drug-Free Workplace, State, and State Agencies

These forms and their associated burden were covered under other collections (OMB Control Numbers 0505-0025 and 0505-0027) so FNS did not include their burden for approval in this collection. However, we did acknowledge our use of these forms and an estimated burden related to our use of these forms. However, for this submission, FNS found out from the Director of the Transparency and Accountability Reporting Division in the USDA Office of the Chief Financial Officer that these assurance, suspension, debarment, and drug-free workplace certification forms are now part of the SAM.gov registration process. Applicants applying for financial assistance and contracts now sign off on these certifications and representations when they register in SAM. Because these forms are covered under SAM.gov, FNS no longer uses them. Consequently, these AD forms have been removed from this revision.

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.

In compliance with the E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Although some grants may be announced via email by the agency, applicants may receive the RFA package by downloading the application from the <u>www.grants.gov</u> website. All applicants must apply for this opportunity directly through the <u>www.grants.gov</u> web portal. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will report financial data using the SF-425 electronically through FNS' Food Programs Reporting System (FPRS) at <u>https://fprs.fns.usda.gov/Home/Reminder.aspx</u> approved under OMB Control No. 0584-0594, Expiration Date: July 31, 2023.

### 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 Question 2.

Applications are unique and program specific. There is no similar data collection effort available.

### 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information requested is the minimum amount required to meet program requirements. It cannot be reduced for small businesses or entities. Although some grantees may be considered a small business or entity; they deliver the same program benefits and perform the same function as any other grantees. Thus, they maintain the same kinds of information on file. FNS estimates that 25 percent of respondents, including for-profit and -non-profit organizations, are small businesses or 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.

This is a voluntary, ongoing data collection, required to obtain and maintain grant benefits. If the information is not collected, the programs will not have adequate data to select appropriate grantees, evaluate which grants should be continued, or monitor financial reporting requirements. FNS will seek minimal information that will be critical in selecting the most promising grantees. Reduced frequency is not possible as the annual frequency of applications coincides with the annual appropriation of funds.

#### 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 that require the collection to be conducted in the manner stated above.

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 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. 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 years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A notice was placed in the Federal Register on April 19, 2022, Volume 87 pages 23160-23164, soliciting comments on FNS's intent to request OMB approval for a uniform grant application package for FNS discretionary grant programs. The public comment period ended on June 21, 2022. FNS received 11 public comments in response to the Federal Register notice (Appendices F-1 through F-11). The majority were from the same individual and none of them were relevant to the information collection.

FNS staff often discuss the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings. For example, FNS staff discussed the application process at several webinars throughout FY 2020 and 2021.

Consultation of RFA's included, but not limited to:

- 1. Joy Standridge, Joy.Standridge@Chickasaw.Net, Deputy Director Nutrition Services, The Chickasaw Nation, Phone: (580) 310-6463
- 2. Betsy Rosenbluth, brosenbluth@shelburnefarms.org, Project Director, Vermont FEED, VT Farm to School, Network Coordinator, Shelburne Farms, Phone: (802) 355-5193
- 3. Aleshia Hall-Campbell, alhall1@olemiss.edu, Executive Director, Institute of Child Nutrition, University of Mississippi, 800-321-3054

GMOB emailed three of our stakeholders noted above and did not receive any feedback.

**9.** Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees. There are no plans to provide payment or gifts to respondents.

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

FNS is requesting the information called for in this application package pursuant to its statutory authority to award grants. Provision of the information requested is entirely voluntary. The collection of this information is for the purpose of aiding in the review of applicants prior to grant award decisions and for management of grants. The only personally identifiable information is requested from potential applicants is included on SF-424. This information may be used within FNS but will not be disclosed outside of the Agency. Grantees will be required to submit semi-annual or quarterly SF-425s, financial status reports. These reports will be stored in a secured database. Therefore, grantees must obtain authorization to submit the form into FPRS. The applications for authorization contain personally identifying information on individuals doing business with Food and Nutrition Service. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006, in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection. Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. Various methods of computer security limit access to records in automated databases.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature included in the uniform grant application package for discretionary grant programs.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

Pre-Award RFA					Total Pre- Award Burden	Total Post Award Reporting	Total		
Estimated No. of Annual Respondents (Applicants) <b>T OPPORTU</b>	-	Total Annual Response s	Estimated Time (Hours) to complete each Application	Total Estimated Pre-Award Burden Hours	Pre- Award Burden Hours	Post Award Hours	Total Responses	Grand Total Burden Hours (Reporting & Record- keeping)	
3,320	1	3,330	42	139,035	160,404	69,187	74,206	230,145	
COMPETITIVE BUSINESS GRANT OPPORTUNITIES									
240		24.0	40	45.00/	47.070	2.000	4.000	20,195	
	Estimated No. of Annual Respondents (Applicants) <b>T OPPORTU</b> 3,320	Estimated No. of Annual Respondents (Applicants) TOPPORTUNITIES 3,320 1 ESS GRANT OPPOR	Estimated No. of Annual Respondents (Applicants) Frequency per Respondent Response s TOPPORTUNITIES 3,320 1 3,330 ESS GRANT OPPORTUNITIE	Estimated No. of Annual Respondents (Applicants)Frequency per RespondentTotal Annual Response sEstimated Time (Hours) to complete each ApplicationTOPPORTUNITIES3,32013,33042ESS GRANT OPPORTUNITIES	Estimated No. of Annual Respondents (Applicants)Frequency per RespondentTotal Annual Response sEstimated Time (Hours) to complete each ApplicationTotal Estimated Pre-Award Burden HoursTOTAL Annual Response sEstimated Time (Hours) to complete each ApplicationTotal Estimated Pre-Award Burden HoursTOPPORTUNITIES3,32013,33042139,035ESS GRANT OPPORTUNITIES	Pre-Award RFAAward BurdenEstimated No. of Annual Respondents (Applicants)Frequency Prequency per RespondentEstimated Time (Hours) to complete each ApplicationTotal Estimated Pre-Award Burden HoursPre- Award Burden HoursTOPPORTUNITIES3,32013,33042139,035160,404ESS GRANT OPPORTUNITIES	Pre-Award RFAPost Award BurdenPost Award ReportingEstimated No. of Annual Respondents (Applicants)Frequency per RespondentTotal Annual Response sEstimated Time (Hours) to complete each ApplicationTotal Estimated Pre-Award Burden HoursPost Award Post Award HoursTOTAL Pre- Award Burden HoursTOTAL Post Annual RespondentsTotal Annual RespondentPost Award Burden HoursTOTAL Post Annual RespondentsTotal Annual Response sTotal Estimated Time (Hours) to complete each ApplicationTotal Estimated Burden HoursPost Award Burden HoursTOPPORTUNITIESESS GRANT OPPORTUNITIESESS GRANT OPPORTUNITIES	Pre-Award RFAPost Award BurdenPost Award ReportingTotalEstimated No. of Annual Respondents (Applicants)Frequency per Respondents sTotal Annual Response sEstimated Time (Hours) to complete each ApplicationTotal Estimated Pre-Award Burden HoursPost Award Post Award HoursPost Award ResponsesTotal Frequency Post Award Burden HoursPost Award Burden HoursPost Award Burden HoursTotal ResponsesTOTAL Annual Respondents (ApplicationTotal Pre-Award Burden HoursPost Award HoursPost Award HoursTotal ResponsesTOTAL Annual Respondents (ApplicationTotal Pre-Award Burden HoursPost Award HoursPost Award HoursPost Award HoursTotal ResponsesTOTAL Annual Respondents (Application)Total Pre-Award Burden HoursPost Award HoursPost Award HoursPost Award HoursPost Award HoursPost Award BurdenPost Award BurdenPost Award HoursPost Award HoursPost Award BurdenPost Award BurdenPost Award BurdenPost Award HoursPost Award Burden3,32013,33042139,035160,40469,18774,206ESS GRANT OPPORTUNITIESImage: Image: Image HoursImage HoursImage HoursImage HoursImage Hours <td colspan<="" td=""></td>	

NONCOMPETITIVE GRANT OPPORTUNITIES									
Subtotal for Noncompetitive State, Local & Tribal Government	2.404	4	2 405	22	404 544	125.064	60.776	70.000	105 404
Agencies	3,106	1	3,195	33	104,561	125,064	69,776	72,899	195,401
Subtotal for Non-Competitive	NON COMPETITIVE BUSINESS GRANT OPPORTUNITIES								
Businesses	231	1	231	49	11,417	12,957	4,732	5,352	17,727
Grand Total SLT & Bus (competitive									
and non-competitive)	6,967	1	7,066	38.26	270,319	315,797	146,495	157,357	463,468

- A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- **B)** Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

This is a voluntary, ongoing data collection, required to obtain and maintain grant benefits The table below provides estimates of average annual and multi-year number of discretionary competitive and noncompetitive grant/cooperative agreement applications expected in FY 2022 thru 2025, the estimated time required to complete the application (program narrative statements) and the estimated total burden hours for each type of annual discretionary grant/cooperative agreement. These estimates reflect numbers of discretionary grant/cooperative agreement applications received in the past and the average length of time it takes to complete the applications submitted. Since generic clearances must request all three years of burden upfront, FNS plans is to depict annual estimates and multiple by three-years the lifecycle of the approval; therefore, FNS is requesting **472,071** total response and **1,500,000** 

burden hours for the next three years. FNS is also including our ongoing request for application (RFA) with the primary collection request. Some of which will be awarded more than once a year. These ongoing grants estimates will make up 463,468 total burden hours and **157,357** responses annually leaving a remaining balance total burden hours **1,036,352** and **314,714** annual responses for 3 years.

Of the 472,071 we plan to use of which **14,385 total annual burden hours** designated by Congress as miscellaneous post-award reporting and recordkeeping burden hours and 78 responses are designated for the RFA which are included with this ICR. Other RFAs will be submitted as a supplemental ICR once the agency have those ready for OMB's review.

**Pre-Award Burden Estimates:** Pre-Award burden hours are based on how many initial applications FNS receives in response to Request for Applications (RFAs.) The estimated **6,967** Grantees can only submit one (1) proposal per RFA. The total annual estimated burden for pre-award is **270,319 hours** based on an estimated 6,967 application submissions (including miscellaneous grant applications) taking between 23 to 60 hours (average **50.0222436**) to complete depending on the specific discretionary grant/cooperative agreement program (including any pre-award forms). We estimate this is an average of 40.77 for States Agency to draft and submit a proposal and 43.28 for Business. For the purpose of the annual and the 3-year OMB approval estimated burden for pre-award burden hours are hours based on an estimated **20,901** application submissions (6,967 x 3) taking 44.583944 hours to complete depending on the specific discretionary grant/cooperative program.

A detailed burden table is included as Appendix B – 0584-0512 Burden Table. The total burden requested under this ICR is as follows:

- (*a*) *General Information and Instructions and program narrative requirements* The above list of grants (see question 1) are submitted for continued clearance under this generic. RFAs for these grants, which includes the general information and instructions, etc., are included in the Appendix A (and submitted under this request as ICs). For other grants submitted under this generic clearance, the RFA will be submitted with the clearance request, but will be similar to those included in the appendix.
  - *Grants.gov Forms* The following grants.gov forms are required of grant applicants. Non-Construction Grant Projects
    Forms: SF-424 Family (also cited and described in #2):
  - 1. SF-424
  - 2. SF-424A
  - 3. SF-424B
  - 4. SF LLL

#### **Post-Award Burden Estimates:**

Post-award burden hours are based on the production of semi-annual or quarterly financial reports using the SF-425 and progress reports and one final report that are submitted to FNS by the grantee selected for the project. Based on an annual

average period of performance, each grantee will submit either 2 semi-annual or 4 quarterly progress and 4 financial reports and 1 final progress report as well as 1 financial report.

- 5. *Progress and Final reports:* The progress and final reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. Based on an annual average period of performance, each grantee will submit either 2 semi-annual or 4 quarterly progress reports (averaged to 3 annual progress and financial reports in the burden table).
- 6. Quarterly and Final Financial Reports: The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant or cooperative agreement.

In an effort to ensure a consistent data reporting format across all program areas, FNS seeks approval of a recently created standardized Progress Reporting Form (FNS-908). The goal is to develop a progress report that moves away from the general narrative structure currently in use by FNS and to focus on measuring and capturing both quantitative and qualitative data as it relates to objectives and goals identified by the individual program solicitations.

The progress reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. The financial reports will be the SF-425, which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant (competitive or non-competitive) or cooperative agreement.

FNS estimates approximately **6,967** applications reviewed annually during the pre-award process out of those **5,223** will be selected for an ongoing grant and required to report and retain records during the post award period. In this request, the agency is seeking approval for **157,357** total annual responses and **463,468** total annual burden hours upfront for the next three-year lifecycle for this generic clearance request for a grand total request upfront for **472,071** total responses and **1,500,000** burden hours for the next three years.

There **3,320** State, Local or Tribal agencies who will apply to *competitive grants* at a frequency of **23.3512048** per respondent for a total of **74,206** total annual responses x **3.10143385** hours per response = **230,145** total annual burden hours (which includes 554 recordkeeping hours). Additionally, **3,106** State, Local or Tribal agencies will apply to *non-competitive grants* at a frequency of **23.4703799** per respondent for a total of **72,899** total annual responses x **2.68043457** hours per response = **195,401** total annual burden hours (which include 561 recordkeeping hours). Furthermore, there are approximately **310** Business-for-not-for-profit who will apply to *competitive grants* at a frequency of **15.8064516** per

respondent for a total of **4,900** total annual responses x **4.12163265** hours per response = **20,196** total annual burden hours (which includes 23 recordkeeping hours). Also, there are approximately **231** Business-for-not-for-profit who will apply to *non-competitive grants* at a frequency of **23.1688312** per respondent for a total of **5,352** total annual responses x **3.31221973** hours per response = **17,727**.

Finally, out of the 5,223 applications (post award grantees) **110** are designated as miscellaneous awards by Congress. Out of the 185 accounted for in the pre-award stages, approximately **75** applications are set aside miscellaneous grants that Congress will award later.

A.12-1 Summary of Post and Pre-Award Estimates of Burden Hours for reporting and recordkeeping with Three-year ear Estimates Affected Public: State, Local and Tribal Government, Universities, and Business-for and Not-for Profit Inserted as a picture so it would not run off the page.

Assuming an applicant staff person with a salary from \$22.66 to \$53.17 is needed to complete the applications, the total annualized dollars spent on respondent burden is \$4,011,222.6 (x 0.33 total = \$1,323,703.40) cost with **fully loaded wages is \$3,568,616.90**) as depicted in Table B.12-1 Estimates of Annualized Cost to Respondents. Wage rates were determined using <a href="http://www.bls.gov/bls/wages.htm">http://www.bls.gov/bls/wages.htm</a> website, Occupational Employment and Wages, May 2021.

#### **B.12-1 Estimates of Annualized Cost to Respondents**

#### **COMPETITIVE GRANTS/COOPERATIVE AGREEMENTS**

		Pre-Award Reporting			Post-Award Reporting			Post Award Recordkeeping			
Type of Applicant	Hourl y Wage Rate	Number of Applicants by Type	Estimated Burden Hours	Pre- Award Reporting Responde nt Cost	Number of Applicant s by Type	Estimated Burden Hours	Post-Award Reporting Respondent Cost	Number of Applicants Awarded	Estimate d Burden Hours	Post- Award Reporting Responde nt Cost	BLS Category
State, Local & Tribal Governme nt Agencies	\$47.72	3,320	139,035	\$6,634,750 .2	2,462	69.19769,18 7	\$3,302,080.80	2,462	.1169	\$26,436.8 8	11-9032 Education Administrat ors, Elementary and Secondary School - Average of State and Local Governmen t
Non-profit Organizati ons	\$21.08	310	15,306	\$322,650.4 8	100	1,400	\$29,512	100	.1169	\$246.43	21-0000 Community and Social Service Occupation s

#### NONCOMPETITIVE GRANTS/COOPERATIVE AGREEMENTS

		Pre-Award Reporting			Post-Award Reporting			Post Award Recordkeeping			
Type of Applicant	Hourly Wage Rate	Number of Applicants by Type	Estim. Burden Hours	Pre-Award Reporting Respondent Cost	Number of Applicants by Type	Estim. Burden Hours	Post-Award Reporting Respondent Cost	Number of Applicants by Type	Estim. Burden Hours	Post- Award Reporting Respondent Cost	BLS Category
State & Local Government	\$47.72	3,106	104,561	\$4,989,540.90	2,492	69,776	\$3,329,710.70	2,492	.1169	\$13,901.54	11-9032 Education Administrators,

											Elementary and Secondary School - Average of State and Local Government
Non-profit Organizations	\$21.08	231	11,417	\$240,670.36	169	4,732	\$38,162,065	169	.1169	\$416.46	21-0000 Community and Social Service Occupations

		Pre-Award Reporting			Post-Award Reporting			Post A			
Type of Applicant	Hourly Wage Rate	Number of Applicants by Type	Estimated Burden Hours	Pre-Award Reporting Respondent Cost	Number of Applicants by Type	Estimated. Burden Hours	Post-Award Reporting Respondent Cost	Number of Applicants by Type	Estimated Burden Hours	Post- Award Reporting Respondent Cost	BLS Category
Total		6,967	270,319	\$1,883,312,473	5,223	146,495	\$765,143,385	5,223	.1169	\$610.57	

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates 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.

There are no capital costs, operating costs, or maintenance to report.

# 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The estimated Federal cost for this information collection is with fully loaded wages is **\$1,332,888.94** (\$1,000,540 + \$1,632.14 x 0.33 to account for fully loaded wages). It is estimated that within FNS there is an average of about 20 hours of labor required to process an application package for this data collection. This labor estimate includes time spent by grants management operations and program staff to process an application (2 hours) and time spent by Agency staff to conduct a thorough technical review of each application (3) staff x 6 hours). Assuming 6,967, applications will be received on average, during FY 2022-2025, it is anticipated that 34,835 hours will be needed to process and review these applications. Assuming that the Agency staff participating in the processing and review of these applications makes approximately \$52.66 per hour, the estimated annual cost to the Federal Government is \$1,834,411.10 (34,835 hours X \$52.66). The cost for the 3-year processing and reviewing these applications is \$5,503,233. (In addition, the grants themselves are expected to total about \$300-\$400 million depending on how many grants are funded on a competitive basis and the merits of the applications received. Wage rates were determined based on the Office of Personnel Management salary table for FY 2021, GS 13, Step 5 (\$58.01 per hour)

Additionally, this information collection also assumes that a total of 20 hours of Federal employee time to draft this information collection: for a GS-14, step 5 Branch Chief at \$68.55 per hour for a total of \$1,371 and the Division Director (GS-15 Step 1 at \$71.15 per hour) reviewed the information collection for consistency which took a total of 6 hours at a cost of \$426.90 for a total of \$1,797.90 on an annual basis for drafting and reviewing this collection request. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2018.)

### 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a revision with change to the currently approved information collection. The current OMB inventory for this collection is **472,071 burden hours and 1,500,000 annual responses over a three-year period and 314,714 total annual responses remaining and 1,036,532 total annual burden hours remaining for future ICR submissions.** With this approval of the primary package, FNS is seeking **463,468 burden hours** (315,797pre-award; 146,495 post-award reporting and 1,175 recordkeeping burden hours) and **59,296 total annual responses** (7,066 pre-award, total annual responses for reporting; 5,223 post award total annual responses for reporting and 47,007 total annual responses for recordkeeping).

### 16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Information in the grant applications will not be published. Disclosure of information contained in the grant application package is subject to the Freedom of Information Act and The Privacy Act. FNS will publicize summary information of the applicants that receive

funding at the FNS website, <u>www.fns.usda.gov/privacy-policy</u>.

### 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.

FNS plans to display the OMB Control number and the expiration date on all instruments.

## 18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

There will be no exception to the certification statement.