

**Office of Partnerships and Public Engagement
Supporting Statement for
Generic Information Collection and Clearance of
“Outreach and Assistance to Socially Disadvantaged Farmers and Ranchers and Veteran
Farmers and Ranchers Program (2501 Program) Application and Performance Reporting”
OMB NO. 0503-NEW**

TERMS OF CLEARANCE: If the agency renews this ICR in the future, they are reminded to use the supporting statement template without any modifications. This ICR renewal request was prepared in accordance with the supporting statement template.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Under 7 USC §6934, the Office of Partnerships and Public Engagement (OPPE) is directed to administer section 2501 of the Food, Agriculture, Conservation, and Trade Act of 1990 (7 USC §2279, The Act). Section 2501 directs the Secretary of Agriculture to carry out an outreach program to encourage and assist socially disadvantaged farmers and ranchers, veteran farmers and ranchers, and beginning farmers and ranchers in owning and operating farms and ranches, and in participating equitably in the full range of agricultural programs offered by the Department. In order to do so, the Secretary may make grants to eligible entities that have demonstrated an ability to provide such outreach and technical assistance. Part A of this ICR addresses the application process for potential grantees to submit applications for funding to the Secretary for the purposes of fulfilling the requirements of section 2501 of The Act.

Additionally, the Secretary is directed by section 2501 of The Act to report certain data to Congress on an annual basis. Part B of this request addresses the creation of a web-based system to collect information from grantees that will partially fulfill this requirement.

Part C of this request addresses the creation of a survey tool that will allow OPPE to engage directly with program participants from grantee programs in order to collect the data needed to respond fully to the Act’s requirements for Congressional Reporting.

OPPE is asking OMB to approve its use of these information collection activities for 3 years.

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.

Information collected through this request will be collected in one of three ways:

- A. **Application Package:** Applicant organizations applying for funding under the 2501 grant program will be asked to complete a standard grants.gov application package. In addition to Standard Forms in the 424 form family (SF 424), the applicant organizations will complete a custom Project Narrative form created by Grants.gov, and submit a Project Abstract, Budget Narrative, list of Key Contacts (list names of all key personnel expected to work on the project), and related documentation (e.g., Articles of Incorporation for all nonprofit organizations, 501(c)(3) status documentation). This information will be solicited from grantee organizations, which may include: Institutes of Higher Education, community-based nonprofit 501(c)(3) organizations, and Tribal entities.
- a. Standard forms on Grants.gov will be used to collect the applicant organization's official name, business and contact information, project abstract, budget, budget narrative, key contacts, and attachments (e.g. Articles of Incorporation). While collection of information from those forms will be approved through the Request for Common Forms (RCF) approval process, the burden hours are included here as part of the application package.
 - b. The new proposed **Project Narrative form** will be used to collect project-specific information that is unique to the 2501 Program and used, in conjunction with the rest of the application package, to evaluate applicant organizations for eligibility and merit, and select grantee organizations based on those evaluations.
- B. **Grantee Performance Reporting:** Recipient organizations will be required to submit progress reports on their activities on a semi-annual basis, except in cases where OPPE deems it necessary to receive reports more frequently, as well as a final performance report summarizing their activities and performance at the end of the award period. Reports also contain financial management information regarding the way OPPE funding was spent by the organization. OPPE plans to collect this information through a web-based portal, which is intended to simplify the collection of this information for both the grantees and the OPPE personnel who process that information. These reports collect data connected to grantee performance to ensure the proper spending of Federal funding.
- a. The mid-year **Semi-Annual report** is a brief summary of grant related activities performed in the first 2 quarters of the fiscal year. The report will be used to assess grantee performance toward the completion of their annual workplan (as provided in their project narrative), and for monitoring any areas of risk such as poor performance or financial controls.
 - b. The end-of-year **Semi-Annual Report** is a comprehensive report about the outputs and outcomes of the project for the entire reporting year. This report is used to assess grantee performance, ensure the proper spending of Federal funding, and monitor the performance measures of the 2501 program.
 - c. The **Final Report** covers the entire grant period and is focused on determining the impact of the project on the target recipients of services. This report is used by

the 2501 program staff for narrative assessment of program success, and to close out the final elements of the grant.

- C. **Participant Outcome Reporting:** Participants in programming by recipient organizations will be asked to complete post-activity surveys regarding their demographics, participation, and outcomes.
- a. **The Participant Response Survey** will be distributed by grantee organizations through a survey platform created and managed by OPPE, which is intended to relieve the recipient organization of the burden of creating a collection mechanism, and also to simplify the collection and collation of this data. This will be used to report on the outcomes and success of the program through the required annual report to Congress on the 2501 program.

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.

OPPE will collect all information electronically, except where accommodation is needed.

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.

This data is unique to the OPPE program requesting it. No similar data are gathered or maintained by OPPE or are available from other sources known to OPPE.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

A review of the last five years of applications to the 2501 grant program revealed that 64% of the applicant organizations are nonprofit organizations with 501(c)(3) status with the IRS, of varying sizes and capacities. While OPPE cannot alter the requirements of grant application process, the office will minimize the burden of reporting on grantee progress by simplifying semi-annual reports, and by reducing the final report to include only information that is not captured in the annual reports.

OPPE will ask information that is directly related to Congressional Reporting, and collecting this data is also a requirement of grantee organizations explicitly stated in the Notice of Funding

Opportunity (NOFO). OPPE will also use accessible, easy-to-complete information collection instruments.

6. Describe the consequences 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.

The application process is imperative to issuing grants and monitoring the expenditure of Federal funds. The data collected from recipient organizations and participants is directly required to fulfill Congressional reporting requirements.

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.**

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

8. 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 form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of

publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

On May 30, 2024, OPPE published in the Federal Register (89 FR 46853), a 60-day notice seeking public comments on its plans to request a 3-year approval of this collection of information. During that time, no substantive comments were received.

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

OPPE will not provide payment or other forms of remuneration to respondents of its various forms of collecting information regarding 2501 program performance.

If it becomes the case that such information collections include hard-to-reach groups and OPPE needs to offer non-standard stipends, OPPE will provide OMB with additional justifications in the request for clearance of these specific activities.

It should also be noted that OPPE may pay for the postage associated with returning responses, if it is determined that some groups cannot respond using the electronic collection methods.

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

If a confidentiality pledge is deemed useful and feasible, OPPE will only include a pledge of confidentiality that is supported by authority established in statute or regulation, which is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If OPPE includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

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.

In Part C, in accordance with OMB's Statistical Policy Directive 15, sensitive questions are asked including race/ethnicity, gender, age, and disabilities. All questions, except for those that are required by the grant making process, are voluntary and used to assess equitable access.

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.

See Respondent Burden Hours Estimate. Information will be collected via standard and custom forms on Grants.gov, and through electronic submissions to the program staff.

• Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

OPPE estimates the total annualized cost to these respondents to be \$1,214,868. OPPE arrived at this figure by multiplying the 34,800 hours of estimated burden by the median total compensation for civilian employees (\$34.91), which includes benefit costs.

The median total compensation for civilian employees was obtained from the U.S. DOL Bureau of Labor and Statistics news released June 18, 2024, “Employer Costs of Employee Compensation – March 2024.”

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 Items 12 and 14).

We estimate that the cost burden to respondents or record keepers in addition to what is mentioned above will be negligible.

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 annualized cost to the Federal Government is \$242,772 in staff time for reviewing the submitted information. In addition, we anticipate additional costs of \$400,000 annually for maintenance of the information collection and storage systems. This results in a total of \$642,772 in annual costs to the government.

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

There are no changes as this is a new information collection request.

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

Information collected under this burden package will be used to publish an annual report to Congress on the progress and success of the 2501 grant program. Such information will be

available to the public. OPPE will disseminate the findings when appropriate, strictly following OPPE's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitation of any data provided.

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.

OPPE will display the OMB approval expiration date.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

OPPE can certify compliance with all provisions in the Act.