

SUPPORTING STATEMENT - PART A
OMB Control Number 0565-NEW
FPAC Federal Award Performance Monitoring and Reporting Form
USDA, Farm Production and Conservation Business Center
Washington, D.C.

1. 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 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, set out in 2 CFR Part 200, require Federal awarding agencies of financial assistance agreements to monitor the progress and measure the performance of agreement recipients. This new information collection request is designed to facilitate compliance with the requirements, specifically those found at 2 CFR 200.301 and 200.329 (text provided below).

Those sections of the regulation provide performance-reporting guidance to awarding agencies and recipients of financial assistance. OMB previously approved Standard Form - Performance Progress Report (SF-PPR) as a tool for use by agencies and award recipients to meet their monitoring and reporting obligations. However, that standard form expired in 2009 and has not been replaced. The proposed information collection will serve as a similar tool, but it includes more specific questions than the former version.

2 CFR 200.301 Performance Measurement

The Federal awarding agency must measure the recipient's performance to show achievement of program goals and objectives, share lessons learned, improve program outcomes, and foster adoption of promising practices.

2 CFR 200.329 Reporting Program Performance

The Federal awarding agency must use OMB-approved common information collections, as applicable, when providing financial and performance reporting information. The non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances.

2. Purpose and Use of the Information.

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.

Farm Production and Conservation (FPAC) mission-area agency financial assistance program staff and grants management specialists will use the information collected to measure financial

assistance recipients' progress toward agreement objectives and milestones. Agency staff also use the information to compare work completed to budgeted funds expended to help ensure recipients stay on track with project execution and to monitor for unusual variations in spend rates, which can signal performance or compliance problems. Currently, recipients must interpret the language in their general terms and conditions, which mirrors the regulation, and determine what information to provide and with what level of detail. This standard collection will provide specific questions, a designated format, and instructions in place of a free-text narrative to ease the administrative burden for recipients.

3. Use of information technology and burden reduction.

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.

FPAC makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. The collection on information is via a standard format electronic PDF document with radio buttons and text fields. Form users will complete form using information technology. The form may be submitted electronically. FPAC expects about 50% of the responses to report electronically.

4. Efforts to identify duplication.

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.

The previous OMB-approved form Standard Form- Performance Progress Report (SF-PPR) expired in 2009, so there is no duplication of effort. This is a new form being created to collect new information.

5. Impacts on small businesses or other small entities.

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

The collection of information will impact small businesses or other small entities. Effort has been made to minimize burden by using commonly available and accessible document format and submission methods. The form is intended to help small businesses and other small entities to be more successful in administering their federal agreements. There are 420 small entities or businesses in this request.

6. Consequences of collecting the information less frequently.

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.

Not collecting information regarding recipient performance using this form increases numerous risks, including recipient non-compliance with the terms and conditions of the agreement, and the agencies and programs lacking key measurement information to inform key stakeholders of successes and to inform programmatic changes.

7. Special circumstances relating to the Guidelines of 5 CFR 1320.5. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a. Requiring respondents to report information more than quarterly. Although rare, authorizing statutes or programmatic policy could require more frequent report. Additionally, so could the results of a risk assessment, either before creating a new agreement, or periodically during an agreement's period of performance.
- b. Requiring written responses in less than 30 days. There are no information collection requirements that require written responses in less than 30 days.
- c. Requiring more than an original and two copies. There are no information collection requirements that require more than an original document or a single copy of a document.
- d. Requiring respondents to retain records for more than 3 years. There are no such requirements.
- e. Not utilizing statistical sampling. There are no such requirements.
- f. Requiring use of statistical sampling which has not been reviewed and approved by OMB. There are no such requirements.
- g. Requiring a pledge of confidentiality. There are no such requirements.
- h. Requiring submission of proprietary trade secrets. There are no such requirements.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. Comments to the Federal Register Notice and efforts for consultation.

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.

The 60-day Federal Register notice was published on April 25, 2024 (89 FR 31717). No comments were received.

A request for comment was also sent to 15 recipients of recent, agency federal awards. 8 comments were received. As required, the 3 names were: Paul R. - paul.robins@rcdmonterey.org; Lisa M - lisa@rafiusa.org; and Micah R. - MSRUSSELL@tarleton.edu.

While many comments were positive, several included requests for simpler language, more consistent terminology with other forms offered by the agency, and greater flexibility in answering some questions, all of which were addressed in a revision to the form. In addition, the form will provide an address for the affected public to submit comments to FPAC at any time.

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

No other payment, gift or incentive will be provided through this information collection request.

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

The information gathered constitutes business data in accordance with 2 *CFR* 200.301 *Performance Measurement* and 2 *CFR* 200.329 *Reporting Program Performance*. It is incumbent upon the federal awarding agency to evaluate the recipient's performance and employ OMB-approved standardized data collections for financial and performance reporting purposes.

Confidentiality concerns do not arise from the acquisition of this information. However, its handling adheres to established protocols implementing the Privacy Act, Freedom of Information Act, and OMB Circular 130, "Responsibilities for the Maintenance of Records about Individuals by Federal Agencies."

This package was reviewed and approved by the Senior Government Information Specialist, Samantha Jones, on September 5, 2024.

11. Justification for any questions of a sensitive nature.

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.

No questions of a sensitive or personal nature are included in the form.

12. Estimates of the hour burden of the collection of information. 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.

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.

The Reporting and Recordkeeping Requirements spreadsheet provides the numbers in this request, and it is included under the supplementary document in ROCIS. On average, the form requires 45 minutes to complete. Annually, the FPAC BC administers approximately 4,000 agreements, each with an average of 2 submissions per year, resulting in an average, cumulative burden of 6,000 hours.

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

Cost To Respondents			
Type of Respondent	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
Recipients (Grant Writers)	\$60.93	6,000	\$365,580
TOTAL			\$365,580

The Estimated Annualized Cost to Respondents assumes that the hourly wage rate for a recipient (grant writer) is \$60.93 based on all management occupation (NAICS 11-0000 using a median average hourly wage -Occupational Employment and Wage Statistics (Department of Labor)). The total burden hours times the Hourly Wage Rate produces the Total Respondent Cost, which is \$365,580.

13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers 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 capitals and start-up, or ongoing operation and maintenance costs associated with this information collection.

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

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.

Cost to Government

Total Annual Responses	Agency Personnel Time to Review (Hours)	Total Burden Hours on Agency Personnel	Average Grants Administrative Hourly Salary	Estimated Annual Cost to Federal Government for Form Review
8,000	1	8,000	\$47.54	\$380,240

Agency personnel time to review the form is estimated at 1 hour per form. Based on 8,000, then 8,000 hours are estimated personnel hours to review. Grants administrative personnel generally are in the GS9 - 15 range. Based on a step one average of these grades, an average hourly salary is \$47.43 per hour based on OPM’s 2024 GS-12/Step1 (\$99,200 per year). Therefore, 8,000 hours x \$47.53 = \$380,240 of estimated annual cost to the federal government to review the form.

15. Explanation of program changes or adjustments. Explain the reasons for any program changes or adjustments reported.

There are none, as this is a new information collection request.

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

The information collected is not intended for publication.

17. Displaying the OMB Approval Expiration Date.

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

FPAC is not requesting an exemption to not display the expiration date.

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

FPAC is able to certify compliance with all provisions.