

2024 SUPPORTING STATEMENT
0572-0112
Technical Assistance Programs, 7 CFR 1775

A. Justification

1. Explain the circumstances that make the collection of information necessary.

This package is submitted under a regular clearance as a revision to a currently approved collection. A program adjustment resulted in a decrease of 334 estimated burden hours (from 5,892 to 5,558). This decrease was a result of the implementation of System of Award Management (SAM) which replaced multiple application forms. The program adjustment accounted for increases in the estimated numbers of respondents from 65 to 66.

Technical Assistance and Training (TAT) and Solid Waste Management (SWM) are competitive grant programs which the Rural Utilities Service (RUS) administers. Section 306 of the Consolidated Farm and Rural Development Act (CONACT), 7 U.S.C. 1926, authorizes RUS to make loans and grants to public agencies, American Indian tribes, and nonprofit corporations. The loans and grants fund the development of drinking water, wastewater, and solid waste disposal facilities in rural areas with populations of up to 10,000 residents. Under the CONACT, 7 U.S.C. 1926(a), as amended, Section 306(a)(14)(A) authorizes Technical Assistance and Training grants, and 7 U.S.C. 1932(b), Section 310B authorizes Solid Waste Management grants. Grants are made for 100 percent of the cost of assistance. TAT grants have grown from \$2.3 million in 1988 to \$37.7 million in 2023; SWM grants, from \$1.5 million in 1991 to \$4.1 million in 2023. These grant programs are administered through 7 CFR 1775.

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.

Nonprofit organizations receive TAT and SWM grants to help small rural communities or areas identify and solve problems relating to community drinking water, wastewater, or solid waste disposal systems. The grant recipients provide technical assistance to public bodies and private nonprofit corporations operating the systems in rural areas. The technical assistance is intended to improve the management and operation of the systems and reduce or eliminate pollution of water resources.

The TAT and SWM grant recipients can give technical assistance to nonprofit corporations and public bodies that are eligible for RUS assistance under the Water and Waste Disposal program. Public bodies include counties, cities, townships, incorporated towns and villages, boroughs, authorities, districts, other political subdivisions of a federally recognized tribes.

Nonprofit organizations applying for TAT and SWM grants must submit an application, which includes an application form, narrative proposal, various other forms, certifications, and supplemental information. The Rural Development State Offices and the RUS National Office staff will use the information collected to determine applicant eligibility, project feasibility, and

the applicant's ability to meet the grant and regulatory requirements. Based on funding availability for each Fiscal Year and the dollar amount requested by applicants, it may not be possible to fund all applications for the amount requested. If a particular application/project cannot be funded for the full amount, the applicant will be requested to submit revised documents to reflect the revision in the scope of the project based on the amount that can be awarded. Failure to collect proper information could result in improper determinations of eligibility, improper use of funds, or hindrances in making grants authorized by the TAT and SWM programs.

The applicant will submit the following information:

Burden Hours Collection

Application:

Documentation of Assistance Provided to Rural Development Employees

Applicants must identify and report any known relationship or association with a RUS employee such as close personal association, immediate family, close relatives, or business associates. This includes any assistance provided to employees.

Indirect Cost Rate Agreement.

The applicant's indirect cost rate agreement with a cognizant Federal Agency must be submitted if their proposed budget includes indirect costs.

Statement of Compliance.

To assure compliance with Title VI of the Civil Rights Act of 1964, the applicant must provide a narrative of how they plan to notify eligible entities of the availability of the service being provided.

Statement Concerning Assistance Under the National Forest Service-Dependent Rural Communities Economic Diversification Act.

Applicants must contact the Forest Service and RUS to find out if any geographical or local areas have received grants for technical assistance to a forest-dependent rural community in a five-year period. TAT and SWM grant funds cannot be used to duplicate technical assistance provided to a forest-dependent rural community under the National Forest-Dependent Rural Communities Economic Diversification Act of 1990. Applicants must submit documentation that such duplicate assistance has not been given.

Evidence of Legal Existence and Authority.

The applicant must submit certified copies of organization documents and a certified list of directors and officers as evidence of the applicant's legal existence and authority for the proposed project. The organizational documents can be charters, bylaws, or articles of incorporation. RUS uses the information to determine if the applicant has the proper authority to enter into a binding agreement to use grant funds.

Evidence of Tax Exempt Status.

Private nonprofit organizations eligible for TAT or SWM grants must have 501(c)(3) or 501(c)(4) tax-exempt status, designated by the Internal Revenue Service. An applicant must submit evidence of its tax-exempt status. RUS uses this information to ensure that the applicant meets the eligibility criteria mandated by law.

Narrative - Project Proposal

Applicants will provide a narrative of experience in providing services similar to those proposed. A brief description of successfully completed projects including the need that was identified and objectives accomplished.

The Narrative/Project Proposal should include:

- A project summary
- Needs Assessment
- Project Goals and Objectives

And the narrative should document ability to administer Technical Assistance and Training, financial resources available to pay operational costs and provide financial assistance to projects, and demonstrate secured commitments of financial support from other sources.

Scope of Work/Work Plan

RUS uses the information in the scope of work to measure the performance of the grant recipient and the success of the project. The scope of work describes what will happen in a project, when, and what staff will be responsible. It provides details on the activities or tasks to be accomplished, objectives, timetables for task completion, and anticipated results.

Budget Justification.

The budget justification demonstrates how the funds will be spent and provides details for proposed expenditures, calculations of costs, and explanations of unusual lines in the budget. It discusses how the budget supports the proposed project activities and explains how each budget item is essential to achieving project objectives. RUS uses this information to evaluate the cost effectiveness of the project and the adequacy of funding to carry out the activities of the project. The information will also be used to evaluate a grant recipient's request for payments

Latest Financial Information.

The applicant's latest financial statement is used to help determine if the applicant is financially viable to complete their proposed scope of work.

Evidence of Financial Management System.

Applicant must provide evidence that a financial management system is in place or proposed. RUS uses the information to determine if the applicant will be able to adequately account for federal funds expended.

Award Closing, Servicing and Reporting:

RUS Bulletin 1775-1, “Grant Agreement.”

The Grant Agreement is the official grant instrument between RUS and the TAT or SWM recipient. It outlines the terms and conditions of the grants, including each party’s obligations and remedial authorities available for nonperformance.

Project Performance Report.

Grant recipients must submit a narrative progress report quarterly. The project performance report summarizes the project’s progress for the quarter and includes information needed to support expenditures claimed for the quarter. The last quarterly report may serve as the final report and must be submitted within 90 days of the project end date. Those items discussed in 1775.20 (d)(1) through (5) should be addressed. RUS uses this information to monitor performance, ensure schedules are met, projected work is accomplished, and objectives are achieved.

The project performance report meets the requirements of: (1) 7 CFR Part 3016, the USDA Implementation of OMB Circular No. A-102, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments;” and (2) 7 CFR Part 3019, the USDA implementation of OMB Circular A-110, “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations.”

Audit.

Grant recipients must comply with the audit requirements of OMB Circular A-133, “Audits of State, Local Governments, and Non-Profit Organizations.” Generally, they must submit an audit report after project completion. However, the requirements for submitting an audit report under OMB Circular A-133 are based on the total amount of Federal financial assistance expended during a grant recipient’s fiscal year from all Federal Sources. Grant recipients that expend above the audit threshold in Federal awards must have a single or program-specific audit conducted for that year. Those that expend less than the audit threshold in Federal awards may be exempt from audit requirements for that year. RUS will review the information and determine if a grant recipient must submit an audit in accordance with the requirements of the Water and Waste Disposal program and OMB Circular A-133.

Financial Statements.

Grant recipients that expend less than the audit threshold in a year in Federal awards may be able to submit their financial statement in lieu of an audit report after project completion. RUS will review the information and determine if a grant recipient must submit an audit in accordance with the requirements of the Water and Waste Disposal program and OMB Circular A-133.

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.

Not Included in Burden Hours

Application:

SF- 424, “Application for Federal Assistance.” (Cleared under 4040-0004)

Applicants use this form as a required cover sheet for applications submitted for TAT and SWM grants. The application is an official form required for all Federal grants and requests basic information about the applicant and the proposed project. This form is submitted as part of the pre-application and if the project is selected, as part of the formal application.

SF-424A, “Budget Information--Non-Construction Programs.” (Cleared under 4040-0006)

Applicants project costs and expenses for the grant project. The form also provides information on matching funds. This form is submitted as part of the pre-application and if the project is selected, as part of the formal application.

RD 400-1, “Equal Opportunity Agreement” and RD 400-4, “Assurance Agreement.” (Cleared under 0575-0018)

Applicants read and sign these forms to assure RUS that they will comply with Title VI of the Civil Rights Act of 1964. Applicants read and sign this form to agree that they will comply with the Equal Opportunity Clause under Executive Order 11246 of September 24, 1965.

SF-LLL, “Disclosure of Lobbying Activities.” (Cleared under 4040-0013)

For grants over \$100,000, applicant must certify that no Federal appropriated funds will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant or Federal loan, and the extension, continuation, renewal amendment, or modification of any Federal contract, grant or loan.

Award Closing, Servicing and Reporting:

SF -270, “Request for Advance or Reimbursement.” (Cleared under 4040-0012)

SF -270 “Request for Advance or Reimbursement,” will be completed by the grantee and submitted to either the State or National Office not more frequently than monthly.

SF 425, “Federal Financial Report.” (Cleared under 4040-0014)

Grant recipients must report the status of grant funds for TAT or SWM on the SF-425 on a quarterly basis. The use of this form complies with OMB Circular A-110.

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.

RUS is committed to meeting requirements of the e-Government Act, which requires Government agencies in general to provide the public the option of submitting information or transacting business electronically to the maximum extent possible. RUS accepts electronic applications for TAT and SWM Grants through Grants.gov.

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.

RUS collects information from applicants only who are applying for or who are receiving TAT or SWM grants. There will be no duplication in the collection of information required. If applicants are applying for other programs where similar information is required, the Agency would make every effort to use that information which is the same.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The term “small entity” has the same meaning as the term “small business,” “small organization,” and “small governmental jurisdiction” in accordance with 5 U.S.C. §601(6). The Small Business Administration (SBA) has established a Table of Small Business Size Standards that matches to the industries described in the North American Industry Classification System (NAICS). According to the standards established by the SBA, 100 percent (199 respondents) of applicants of the TAT and SWM programs are classified as small entities. The information to be collected for the administration of the grant program is the minimum that RUS needs to approve the grants and monitor performance. Small entities may be affected by the reporting burden, but only minimum information necessary is required to carry out the authorized programs.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information collected under these programs is the minimum necessary to conform to the requirements of the program regulations established by law. Much of the information is collected when applicants file for grants or when the grants are closed. Information is collected when needed or required by departmental regulations and OMB circulars. Information cannot be collected less frequently and meet the requirements of the programs. Failure to collect proper information could result in improper determinations of eligibility or improper use of funds.

7. 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.
There are no information requirements for reporting more than quarterly
- b. Requiring written responses in less than 30 days.
There are no information requirements for written responses in less than 30 days. However, grant recipients must notify RUS immediately of developments that have a significant impact on the grant-supported activities or that might materially impair the ability to meet the objectives of the grant.

- c. Requiring more than an original and two copies.
There are no such requirements.
- d. Requiring respondents to retain records for more than 3 years.
There are no such requirements unless any litigation, claim, or audit is started before the expiration of the 3-year period and has not been resolved and final action taken.
- e. That is not designed to produce valid and reliable results that can be generalized to the universe of study.
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.

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.

As required by 5 CFR 1320, 8(d), a notice to request public comments was published on September 16, 2024 at 89 FR 75529. The notice provided 60 days for the public to provide comments on the information collection package. As of November 18, 2024 not comments had been received.

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.

Inter Tribal Council of Arizona, Inc. (ITCA)

- 2214 North Central Ave., Suite 100, Phoenix, AZ 85004
- National Tribal Water Systems Department Director. 602-307-1537
- ITCA monitors and obtains forms from USDA webpages and Grants.gov. Application documents are easily accessible. The level of information required is extensive and the potential for streamlining should be investigated. They find it difficult to decipher or interpret grant proposal specification set forth in the application guide, NOFOs and regulations. The Priority Points criteria changing from year to year when NOFO is published leaves very little time for applicants to adjust their proposal approach. Furthermore, the Priority Points criteria and specified tools often do not accommodate

federal trust tribal land (Indian reservations) which are not geographically defined by county, zip code, or census tract demarcation. Reporting requirements for Civil Rights Act compliance has been an ongoing problem for grantees that are Tribal consortia serving only Indian tribes.

- Water & Waste Disposal Technical Assistance & Training Grants (TAT) program

Cooperative Development Institute, Inc. (CDI)

- PO Box 1051, Northampton, MA 01061
- Director of Water Infrastructure Support Program, 413-665-1271
- CDI learned about the TAT program through word of mouth from Vermont Housing Finance Agency. The level of information collected, processing instructions and record keeping and reporting requirements is reasonable. Additionally, eligibility and processing instructions were easy to understand and interpret. They were able to access forms via grants.gov. Getting the statewide non metropolitan median household income (SNMHI) was not easily accessible. CDI reached out to the RD contact to obtain this information. The program could serve more manufactured housing communities (MHC) if the program rules could be modified. There is plenty of research and data that show MHCs have substantially lower MHIs than their surrounding towns. Conducting income survey of each individual MHC with such a high required response rate can easily take 8-12 months. Thus, rural MHCs that have pressing water infrastructure needs but are located in more affluent towns (with MHIs higher than the SNMHI), have to wait up to a year before they can even begin receiving meaningful assistance. Perhaps there can be a program rule change that automatically recognizes that MHCs serve a population that earns under the SNMHI.
- Water & Waste Disposal Technical Assistance & Training Grants (TAT) program
- George Mason University
- 4461 Rockfish Creek Ln, George Mason University, Fairfax, VA 22030
- Assistant Professor, 703-993-1513
- They learned about the program via grants.gov. Documents were easily accessible using USDA website. The level of information, eligibility and processing, record keeping and reporting requirements are reasonable, easy to understand and interpret. For an academic institution, grant duration could be increased so new students can be trained to complete project.
- Solid Waste Management Grants (SWMG) program

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

RUS has not made any such decisions or payments.

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 is provided. Under the Freedom of Information Act, the public can request most data collected from respondents. The information collected under the provisions of these programs is not considered to be confidential.

The Agency does support maintenance of confidentiality when appropriate. The Agency published a System of Records, “USDA/RD–1 Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and other participants in RD programs” in the Federal Register on September 6, 2024 (89 FR 72820). A copy of that document can be found at <https://federalregister.gov/documents/2024/09/06/2024-20068/privacy-act-of-1974-system-of-records>.

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

The information collected does not contain any questions of a sensitive nature that would be considered private.

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

Based on the current funding levels of the program, the burden for collecting information is estimated to average approximately 66 respondents annually filing 1,100 responses. A total of 5,558 hours per year were estimated to be required to complete these responses; thus, averaging about 5.053 hours per response.

The cost per hour used was \$52.68, which was calculated by using the May 2023 National Occupational Employment and Wage Estimates, United States; Bureau of Labor Statistics, [Loan Officers](#), Occupation Code 13-2072 Loan Officers. Refer to Mean hourly wage of \$40.62 plus Benefits are estimated at 29.7% based on Bureau of Labor Statistics “Employer Costs for Employee Compensation Summary” dated September 10, 2024 at [Employer Costs for Employee Compensation Summary - 2024 Q02 Results](#) total of \$52.68/hr.

Based on this data, the estimated cost of burden is \$292,790. The following summarizes these estimates:

Number of respondents:	66
Total annual responses:	1,100
Number of hours per response:	5.053
Total hours:	5,558
Cost per hour:	\$52.68
Total annual cost:	\$292,790

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information for (a) capital and start-up cost and (b) operation, maintenance and purchase of services components.

There are no capital and start-up costs and purchase of services components involved with this collection.

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

The estimated annual cost for the Agency to administer this regulation is \$21,334.50. RUS estimates that a total of 285 hours are required annually for document review, application review, etc. The Office of Personnel and Management GS wage rate table (hourly) for a General Schedule employee “For the Locality Pay Area of St. Louis-St. Charles-Farmington, MO-IL” for 2024 is used to estimate the wage rates for each type of Agency function. Cost per hour for government employees is from the OPM GS Wage Table, January, 2024 at [Pay & Leave : Salaries & Wages - OPM.gov.](#) The cost of total benefits as a percentage of total hourly compensation for Federal Government employees has been calculated by multiplying 36.25% by the referenced hourly OPM wage in accordance with OMB Memorandum M-08-13. A breakdown of the costs to the Federal Government to administer this program is as follows:

Wage Category	Hourly Wage and Benefits	Hours	Cost of Burden
Loan Specialist – State Office GS 12, Step 5	\$65.89	80	\$5,271.24
Program Director – State Office GS 13, Step 5	\$78.36	5	\$ 391.79
Community Program Specialist – National Office GS 13, Step 5	\$78.36	200	\$15,21,33671.48
Cost to Federal Government			\$21,334.50

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

This is a revision to the currently approved collection. There is an overall decrease of 334 hours since the last submission. This decrease was a result of the implementation of System of Award Management (SAM) which replaced multiple application forms. There was an increased in the total number of respondents from 65 to 66.

The federal employee positions to operate TAT and SWM programs were reevaluated and updated to include State Loan Specialist and Program Director. The hourly wage rate and benefit was also update. These updates resulted in an increased cost to the federal government.

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

RUS has no plans to publish the information collected under the provisions of these programs.

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.

There are no forms cleared under this collection.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-1.

There are no exceptions requested.

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.