

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

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. To do so, the Secretary may make grants to eligible entities that have demonstrated an ability to provide such outreach and technical assistance. This is an ongoing collection that OPPE recently discovered did not have appropriate PRA approval. In 2024, OPPE conducted an extensive review of their program and discovered this PRA violation. Based on that review, the program has been collecting some of this information since 2010. This collection is an effort to correct that oversight and bring this collection into PRA compliance. The request contains three (3) items which include new, not previously collected information collection, and a revision of a previous, unapproved information collection. The items are explained in detail in Question 2.

Item A – Application Package 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. This information has been collected without PRA approval since the program was implemented, however, OPPE is proposing to create a narrative application form specific to the program.

Additionally, the Secretary is directed by section 2501 of The Act to report certain data to Congress on an annual basis. **Item B – Grantee Performance Reporting** of this request addresses the creation of modified reporting forms and a web-based system to collect information from grantees that will partially fulfill this requirement. Item B is a revision of a previous, unapproved information collection.

Item C – Participant Outcome Reporting of this request addresses the creation of a survey tool that will allow OPPE to engage directly with program beneficiaries to collect the data needed to respond fully to the Act’s requirements for Congressional Reporting. Item C is a new, not previously collected information collection.

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.

Item A: 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. As noted above, this information has been collected since 2010, and not in compliance with the requirements of the PRA. However, some elements of this collection are being modified at this stage.

1. 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.
2. 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. While the information collected in this form is not new, the format and questions have changed by combining elements of data requested across multiple forms, and by implementing a more structure template to what was previously a freeform narrative response.

Item B: 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. Currently, OPPE collects this information using grant management software EZ Fed Grants. However, that tool does not allow for the collation of the data submitted, and produces a single unique PDF of each organization's narrative submission. Following OMB's approval of this collection, OPPE plans to collect this information through a different, more user-friendly web-based portal that allows the data collected for the program to be collated, aggregated, and analyzed, 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 use of Federal funding and alignment with program objectives.

1. The **first Semi-Annual Report** (aka. Mid-Year Report) is a summary of grant-related activities performed in the first two 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 project implementation or financial controls.
2. The **second Semi-Annual Report** (aka. Annual Report) is a comprehensive report containing 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 assess grantee progress against the program's performance measures.
3. 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 narrative report is used by the 2501 program staff for assessment of program success, and to support grant close-out activities.

Item C: People who participate in programming by recipient organizations will be asked to complete post-activity surveys regarding their participation, outcomes, and demographics.

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 aggregation of this data. The data 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.

All Items: 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.

All Items: 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.

All Items: A review of the last five years of applications to the 2501 grant program revealed that 64 percent of the applicant organizations are nonprofit organizations with 501(c)(3) status with the IRS, of varying sizes and capacities. OPPE is minimizing the burden of grantee progress

reporting by simplifying the 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 mandated 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.

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

Item B: These performance reports are integral to monitoring and evaluation of the use of Federal funds. The data collected from recipient organizations is required to fulfill Government Performance and Results Act (GPRA) and Congressional reporting requirements.

Item C: The participant outcome reporting is imperative to issuing grants and monitoring the use of Federal funds. The data collected from recipient organizations and participants is required to fulfill GPRA and 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.**

All Items: 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.

All Items: 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.

Item A: OPPE will not provide payment or other forms of remuneration to respondents of this collection instrument.

Item B: OPPE will not provide payment or other forms of remuneration to respondents of these performance reports.

Item C: In general, OPPE will not provide payment or other forms of remuneration to respondents of its various forms of collecting information regarding 2501 program performance. However, if in partnership with our grantee organizations, it is determined that we can increase the response rate of difficult-to-reach populations through incentivization, OPPE will consider the use of gifts to respondents. If that becomes the case, OPPE will provide OMB with additional justification in the request for clearance of these specific activities.

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

Item A: OPPE will pledge to keep applicant information confidential to the extent permitted by law.

Item B: OPPE does not assure confidentiality of information reported about grantee performance. This reported information is explicitly used in reporting to Congress and the public about the performance of the program.

Item C: Information submitted by program participants is anonymous and linked only to the program site at which they received services.

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.

Item A: No sensitive questions are asked as part of the application package.

Item B: In accordance with OMB's Statistical Policy Directive 15, grantee organizations may solicit information such as race/ethnicity, gender, age, and disabilities for their participants. All demographic questions are voluntary and used to assess equitable access.

Item C: In accordance with OMB's Statistical Policy Directive 15, sensitive questions are asked including race/ethnicity, gender, age, and disabilities. All demographic questions 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.

Item A: OPPE has estimated the time for completion of the application package as 160 hours per respondent. However, because the information OPPE is collecting from applicants will be in a new format OPPE will seek input from actual applicants who have used the new forms before requesting renewal of this burden package in order to ensure accuracy of the burden estimate.

There are about 100 applicants to the 2501 program annually. For this package, we have taken a high estimate of 120 applicants per year, and a completion time of 160 hours to estimate a total of 19,200 burden hours. Information will be collected via standard and custom forms on Grants.gov.

Item B: Based on informal responses from existing 2501 grantees, OPPE has estimated that the new reports will take approximately two (2) hours for the Mid-Year Report, 20 hours for the Annual Report, and 30 hours for the Final Report. OPPE will reach out to grantees before renewal of this burden package to adjust the response times for accuracy.

At its largest, the 2501 program has had no more than 120 grantee organizations at any one time. In order to build in some room for error, OPPE has estimated that in any given year up to 150 organizations will be providing Mid-year and Annual Reports. One third of the organizations, on average, will be expected to complete their grants in any given year, for a total of 50 Final Reports.

The total estimated burden for this element is 8,100 hours.

Item C: Because this is a new collection element that has not previously been collected, OPPE has estimated the burden per respondent at no more than 30 minutes. OPPE designed the participant survey to take not more than 15 minutes, but wish to account for limited English proficiency, low literacy, or other factors that may cause the response time to increase.

OPPE anticipates up to 15,000 responses, with up to 5,000 unique respondents, for a total of 7,500 burden hours.

See Respondent Burden Hours Estimate for more details.

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

Item A: OPPE estimates the total annualized cost to these respondents to be \$670,272. OPPE arrived at this figure by multiplying the 19,200 hours of estimated burden by the median total compensation for civilian employees (\$34.91), which includes benefit costs.

Item B: OPPE estimates the total annualized cost to these respondents to be \$282,771. OPPE arrived at this figure by multiplying the 8,100 hours of estimated burden by the median total compensation for civilian employees (\$34.91), which includes benefit costs.

Item C: OPPE estimates the total annualized cost to these respondents to be \$261,825. OPPE arrived at this figure by multiplying the 7,500 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).

OPPE estimates 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.

Item A: The estimated annualized cost to the Federal Government is \$54,967 in staff time for reviewing the submitted information. In addition, we anticipate additional costs of \$360,000 annually for maintenance of the information collection and storage systems. This results in a total of \$414,967 in annual costs to the government.

Item B: The estimated annualized cost to the Federal Government is \$174,063 in staff time for reviewing the submitted information. In addition, we anticipate additional costs of \$20,000 annually for maintenance of the information collection and storage systems. This results in a total of \$194,063 in annual costs to the government.

Item C: The estimated annualized cost to the Federal Government is \$13,742 in staff time for reviewing the submitted information. In addition, we anticipate additional costs of \$20,000 annually for maintenance of the information collection and storage systems. This results in a total of \$33,742 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.

Items A and B: There are no changes as this information, in whole or in part, was previously collected, but not covered by an information collection package. This request will bring the program into compliance with the PRA.

Item C: There are no changes as this is new information not previously collected.

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

Item A: Information collected under this part of the burden package will not be released to the public as it is used for the purpose of selecting awardees.

Item B: 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 and used to meet GPRA requirements. Because these forms are being revised under this collection request, OPPE anticipates creating the reporting templates for this data once it is available, as the data quality will not be clear until it is received. However, we anticipate that data will be presented in the aggregate by program objectives, outcomes, outputs, and other variables. Such information will be available to the public.

Item C: 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 and used to meet GPRA requirements. As with Item B, OPPE cannot determine the quality of data received until testing the collection instrument after it is approved. However, we anticipate that data will be presented as a series of maps and charts that display outcome data in alignment with the program metrics and requirements of section 2501 of The Act. Data will generally be presented in the aggregate, but OPPE will work to ensure response rates large enough to present data that is disaggregated by demographic. Such information will be available to the public. Additionally, OPPE intends to make data reported about each recipient grantee organization, which is not available to the public, available to that organization for its own use.

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.