

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS
U.S. DEPARTMENT OF AGRICULTURE GENERIC SOLUTION FOR FUNDING
OPPORTUNITY ANNOUNCEMENTS
0503-0028**

Part A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Describe the practical utility of the collection, including proposed and actual use. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

USDA is required by 2 CFR 200.204 to announce discretionary grants and cooperative agreements and other financial assistance programs through public announcement. This includes announcements for pilot programs and one-time funding programs. A variety of public-facing documents are used to meet this requirement such as Funding Opportunity Announcements (FOAs), Request for Applications (RFAs), Notice of Funding Announcements (NOFAs), Notice of Solicitation of Applications (NOSAs), *Grants.gov* announcements, Notice of Awards, or other funding announcement type (hereinafter referred to as “funding announcements”). The specific statutes for these programs cannot be identified in advance but will be included as part of each submission request to OMB.

To ensure grants are awarded to the applicant(s) best suited to perform the functions of the grant, applicants are generally required to submit an application.

The first part of USDA grant applications consists of submitting the application form(s), which includes the Standard Form 424, Application for Federal Assistance and may include additional standard grant application forms (<https://www.grants.gov/forms/sf-424-family.html>). The second part of a grant application usually requires a technical proposal demonstrating the applicant's capabilities in accordance with a statement of work or selection criteria and other related information as specified in the funding announcement. In some cases, applicants may be asked for additional information as part of the application or following the award of a grant that is not captured on a preexisting, approved information collection. For example:

- a) Applications may be asked to describe the applicant organization, including skills, experience, biographies, history, knowledge, qualifications, capabilities, office locations, and/or organization chart.
- b) Applicants may be asked to describe other entities participating or collaborating with the applicant organization that may include businesses, workforce investment boards, Governor's office, letters of support, copies of agreements, and/or contracts.
- c) Applicants may be asked to describe a plan for implementing or achieving the program goals. Requested elements may include strategy, process, method, schedule, timeline,

innovations, communications, program design, management, focus, and/or statement of work.

- d) Applicants may be asked to describe the measures of success for the plan and to provide progress reports. Requested elements may include outcomes, goals, number served, number hired, increase in wages, educational degrees, cost effectiveness, results oriented model, feedback mechanism, performance accountability, evaluation and improvement, and/or the proposed system to monitor the implementation of program activities and achievement of stated project objectives.
- e) Applicants may be asked to describe the plan for implementing or achieving the program goals. Requested elements may include strategy, process, method, schedule, timeline, innovations, communications, program design, management, focus, and/or statement of work.
- f) Applicants may be asked to describe the recipients or target audience of the plan. Requested elements may include description and/or demographics of service region, occupations served, diversity, civil
 - a. rights information.
- g) Applicants may be asked include a budget plan and to describe alternative funding sources. This element may include sources, supplemental sources, material support, in kind support, matching funds, and/or other support.
- h) Applicants may be asked to describe how this program can or will outlast the federal funding.

Such information will only be asked where necessary to evaluate the application or to run the program, and duplicative information (included any information provided in the SF-424 forms) will not be requested on any forms approved under this collection of information, except for the minimal information necessary to allow for identification of separate forms in an application package (i.e., applicant and/or project name).

While USDA has authority to collect application information for many of its existing grant programs, the Department is now seeking approval of a generic grant application to cover elements like those listed above that may not be captured on an existing, approved application. Without approval to collect the necessary information with the application or after the award, USDA's ability to make timely awards is compromised. USDA will only use this collection for one-time pilot programs or one-time funding announcements of new programs. If additional funding becomes available or if the agency undertakes additional rounds of funding for a program, USDA will prepare a distinct collection for the program, with the required 60- and 30-day Federal Register notices, and remove the program from this generic collection (if included at the time).

A Federal agency generally cannot conduct or sponsor a collection of information, and the public is generally not required to respond to an information collection, unless it is approved by OMB under the PRA and displays a currently valid OMB Control Number. In addition, notwithstanding any other provisions of law, no person will be subject to penalty for failing to

comply with a collection of information if the collection of information does not display a valid Control Number. See [5 CFR 1320.5\(a\)](#) and [1320.6](#).

USDA is seeking approval from OMB for this collection of information for 3 years.

USDA recommends approving the following review procedures for this generic collection clearance:

- a. USDA will request approval to collect the information outlined in Part A, 1 (a-h) by submitting the following information for OIRA:
 - I. Statute underlying the pilot or one-time funding;
 - II. Information being collected that is not covered on standard form SF-424;
 - III. Estimated burden hours for this information; and
 - IV. Any unique start-up or operational and maintenance costs that result from the collection of this information.
- b. USDA will disclose the paperwork requirements, associated burden, and OMB number in all funding announcements and associated forms. Specifically, all funding announcements and associated forms will include the following PRA burden statement, with the highlighted text to be updated as appropriate: A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a currently valid OMB Control Number. The OMB Control Number for this information collection is #####-####. Public reporting for this collection of information is estimated to be approximately ## minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information. All responses to this collection of information are voluntary; however, failure to provide this information could result in program benefits being withheld or denied. USDA has no plans to publish information collected under the provisions of this program, though winning proposals are posted online. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: the point of contact listed in the announcement.
- c. The USDA Office of the Chief Information Officer will review all funding announcements and associated forms for compliance with the Paperwork Reduction Act and the terms agreed upon in this information collection request.

- d. Any requests submitted under this generic collection clearance will be submitted to the OMB for approval, and the associated funding announcements will not be published until after OMB approves the collection requirements. OMB approval of the collection request is limited to its authority under the Paperwork Reduction Act and does not signify OMB approval of the funding announcement or related materials under any relevant statute, Executive Order, or other authority.
- e. USDA will monitor the number of responses and burden associated with the information collection requirements submitted under this approval. At the end of the year, USDA will include this burden in its Information Collection Budget report.

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.

The information collected in response to solicitations for grant applications have been and will be used by the USDA for issuing grants to the applicants most suited for fulfilling the mission of the grant.

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 burdens.

2 CFR 200.204 requires USDA agencies to post funding opportunities using the Federal website, Grants.gov. Grants.gov allows customers to submit electronic applications to the Federal agency. Some agencies still allow submission of paper. A few agencies post their opportunity to Grants.gov and offer an application system for customers to apply.

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.

The information collected in USDA funding announcements and associated forms and in the associated reporting requirements is unique to each grant; therefore, it is not duplicated in any other source. As applicable, the Department utilizes currently approved standard forms and will not duplicate information collected on these forms.

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

extent practicable and appropriate, the burden on all persons, including small entities, providing information.

To limit the burden imposed on respondents, the Department requires the minimum information needed to award grants.

USDA grant-making agencies have existing structures and resources in place for evaluating applications, awarding grants, and managing grants.

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 the burden.

USDA activities regarding grants would be significantly hindered if it were not able to collect the information required to evaluate potential grant recipients.

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.**

The Department will ensure that all collections of information contained in its funding announcements and associated forms comply with 5 C.F.R. § 1320.5.

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 C.F.R. § 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 periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The USDA published a 60-day *Federal Register* notice on December 28, 2023 (88 FR 89654). The Department received no comments.

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

The Department does not provide any payment or gift to respondents in connection with this ICR.

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

The Department makes no assurance of confidentiality to those responding to funding announcements and associated forms; however, as a practical matter, disclosures are only made in compliance with the Freedom of Information Act (FOIA) and USDA regulations implementing that statute.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

Application and reporting requirements in funding announcements and associated forms do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

The USDA bases the following estimates on historical experience. The USDA projects an average of 100 funding announcements per fiscal year will fall under this generic request, which is the subset of grants for which no other approved information collection exists for USDA to collect this information, and usually represents grants derived from supplemental funding enacted outside of the regular appropriations process. Additionally, the Department projects that it will receive approximately 77,500 applications annually. For example, as of September 2023, FSA has so far received OMB approval for the total of 125,168 hours since its approval in November 2022. To date, USDA has requested, and OMB has approved an additional 425,180 burden hours to be used for the ICs submitted under 0503-0028. FSA has submitted additional requests and is preparing to submit another – for a combined total of 100,188. This would be a total of 525,368 burden hours requested for the first 9 months. Using that as an estimate and given that FSA is but one component within USDA utilizing this collection, it is reasonable to consider that the use of the GEN IC through November 2025 could require 1,550,000 burden hours.

The Department assumes it takes an average of 20 working hours to prepare and submit an application in response to a funding announcement. For purposes of this information collection request, the USDA has used the average hourly earnings of a person in business and professional (\$33.17 per hour¹) to monetize the value of respondent time. For monetization purposes, the USDA has increased this rate by 40 percent, to account for fringe benefits. The total hourly rate is \$46.44. $\$33.17 \times 140\% = \46.44 . Therefore, the burden for these reporting activities is as follows using average response times:

77,500 applications * 20 hours = 1,550,000 hours.

1,550,000 hours * \$46.44 = \$71,982,000.

13. Provide an estimate 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 Items 12 and 14).

- **The cost estimate 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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no costs other than monetization of hourly burden as captured above in Item 12.

¹ See [The Employment Situation—April 2019](#) at 33, DOL, Bureau of Labor Statistics (May 3, 2019).

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 17, 18, and 19 in a single table.

If the Department incurs any unique start-up or operational and maintenance costs with the collection of information covered by this ICR, USDA will include them on the request to OMB.

15. Explain the reasons for any program changes or adjustments reporting in Items 12 or 13.

USDA is requesting an increase the approved burden hours to cover grant or cooperative agreement activity and funding announcements of new programs for other types of Federal financial assistance. USDA requests a decrease in the responses by 42,500 and an increase in burden hours by 1.05 million hours due to the applications for specific programs that provide Federal financial assistance that require more burden hours than grants and cooperative agreements because they do not use the same common forms used for grants and cooperative agreements. USDA has successfully used the existing approval for ongoing information collection activities and is expecting to utilize this collection well beyond the initial estimates when the ICR was first approved by OMB. In May 2023, an additional 100,000 hours of burden was added to the original approval given USDA's increased needs due to new programs. Based on this, USDA anticipates an increased utilization of this generic beyond what was previously approved.

16. For collections of information in which results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Department has no plans to publish the information collected in associated with funding announcements and associated forms; however, winning proposals are posted on the Internet.

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.

USDA will include the OMB control number and expiration date on all funding announcements and associated forms.

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

The Department is not seeking an exception to the certification statement.

Part B. Statistical Methods

This information collection does not employ statistical methods.