SUPPORTING STATEMENT
for PART A

OMB Control Number (0551–0038)

Title:
Technical Assistance for Specialty Crops

ICR Author:
Curt Alt

USDA, Foreign Agricultural Service

1400 Independence Ave, SW

Washington, DC 20250

1. Explain the 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.

This collection is a revision of a currently approved collection.

The Technical Assistance for Specialty Crops program is authorized by Section 3205 of the Farm Security and Rural Investment Act of 2002 (Pub. L. 107–171), as amended, and became effective on May 13, 2002. Program regulations appear at 7 CFR part 1487. The program was most recently reauthorized through the Agriculture Improvement Act of 2018.

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 Foreign Agricultural Service (FAS) administers the program on behalf of the Commodity Credit Corporation (CCC). Data collected will be used by FAS marketing specialists and program managers for fund allocation, program management, planning, and assessment. Participants are required to keep documents for 5 years after completing a project.

> Proposals: Through the proposal, prospective applicants submit data about their organizations and projects so that FAS can determine the extent to which applicants satisfy the criteria upon which allocations are based. The proposal must include the information outlined in each program year’s Notice of Funding Opportunity (NOFO), which are published annually on Grants.gov.

> Project Agreements: The project agreement is a binding instrument and creates a legal obligation on the part of CCC to make funds available to the Participant. The agreement creates a relationship between CCC and the Participant, with each side contributing resources to support achievement of mutual goals. Because the agreement binds the United States Government, it is a proper basis for obligating funds and establishing the basis for this program.

> Performance Measurement: FAS requires Participants, in their applications, to submit performance measures to: (1) monitor performance of technical assistance projects, (2) evaluate the benefits and effects of these projects, and (3) document the experience gained from these activities for use in the design and implementation of future projects. Based on this information, FAS program managers are also better able to determine what changes are needed in future programs to improve program performance.

Reimbursement Claims: The project agreement and corresponding amendments provide the authorities and limitations for Participants to make expenditures. The Participant is responsible for instituting a financial management and accounting system that ensures accurate, current, and complete disclosure of all financial transactions for each approved activity. All expenditures incurred must be proper, reasonable, and in accordance with program regulations. The Participant is responsible for submitting claims to FAS requesting reimbursement for incurred costs as outlined in the application.

Office Management Records: Other reporting and recordkeeping requirements, e.g. travel reports, are required as a means of ensuring that U.S. Government resources are disbursed as judiciously as possible. FAS requires the same control of Participant spending of taxpayer funds as the U.S. Government requires of its own employees. For example, FAS asks Participants traveling on U.S. Government funds to follow provisions of the Federal Travel Regulations.

Other Reports and Record Keeping Requirements: Other reports and records are required to ensure the proper and judicious use of Government resources. Participants must submit reports of findings whenever CCC resources are used for travel or research purposes. Auditable supporting documentation is required for all expenses reimbursed with CCC resources. These might include, but are not limited to: canceled checks, invoices, samples of produced materials, etc. As a rule, such requirements conform to generally accepted Government standards.

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.

FAS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. FAS requires only the bare minimum in data collection and submission from applicants. The few activity codes established by FAS for use by Participants are used to answer congressional inquiries in program areas such as travel, administrative costs, and evaluation.

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.

Every effort has been made to avoid duplication. There is no similar data collection available. To ensure integrity, FAS solely administers the data required by Participants who submit and enter into business with FAS in accordance with contract specifications and which cannot be obtained from any other source other than the Participants. Program Participants are commodity organizations who develop proposals specifically for each project. Most of the data developed and presented to FAS is developed in–house by technical experts on their staffs.

Since 1997, FAS has required TASC Participants to use the Unified Export Strategy (UES) system. The UES was custom–built from the ground up for the specific purpose of administering the FAS market development programs and includes specific capabilities and enhancements that are not available in any other system. The core benefit of the UES is that it allows applicants to submit a single application that can contain an unlimited number of coordinated and interlinked applications across the six different FAS market development programs. This use of a single, holistic application provides tremendous time and cost savings to applicants, and reduces their application burden significantly.

The design of the UES forces interested applicants to think strategically about their approach to their worldwide promotional activities and develop an integrated and holistic marketing plan that outlines their proposed foreign market development activities and directs requested funding under each of the FAS market development programs to where it can be most effective and useful. An additional benefit of applying through the UES is the elimination of duplication and redundancy across related applications. By requiring only a single coordinated application for unlimited proposals across the FAS market development programs, applicants only need to enter required information once. Finally, the use of the UES means that FAS does not need to require the use of any other supplemental forms or documents, including the common Standard Forms used in other programs, because all of the necessary information is already captured in the UES system. The elimination of unnecessary duplication and wasted effort has saved thousands of hours and millions of dollars since the system was introduction in 1997, and the ease of application and robust system flexibility are appreciated and welcomed by the program stakeholders.

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.

This program places information collection requirements on applicants, who generally include U.S. government agencies, State government agencies, non–profit trade associations, universities, agricultural cooperatives, and private companies. For the purposes of this collection, Federal responses have been excluded. Of the 25 estimated annual respondents, the agency estimates 4% are small businesses. Thus, the information collection requirements imposed by this program do not require any significant actions on the part of small businesses.

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 burden.

This is a mandatory, on-going information collection request. Proposals are only submitted when an applicant would like to receive funding for a project. No other data is collected unless the proposal is approved.

Less frequent collection is not possible without the agency violating the laws that govern this program. The Technical Assistance for Specialty Crops program is authorized by Section 3205 of the Farm Security and Rural Investment Act of 2002 (Pub. L. 107–171), as amended, and became effective on May 13, 2002. Program regulations appear at 7 CFR part 1487. Section 3205 provides that the Secretary of Agriculture shall establish a program to address unique barriers that prohibit or threaten the export of U.S. specialty crops. Without this collection, the agency would not be able to effectively implement and monitor the established program set by Congress.

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 or government contract, grant–in–aid, or tax records for more than three years;**

* **in connection with a survey that is not designed to produce valid and reliable results that can be generalized to the universe of the 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.**

There are no special circumstances that require the collection of information inconsistent with 5 CFR 1320.

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 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.

FAS published a 60-day Notice of Proposed Information Collections for public comments in the *Federal Register*, Volume 90; Page 24092, on June 6, 2025. The public was given until August 5, 2025, to submit comments on the proposed information collection. FAS received no comments on this proposed collection.

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.

In March 2025, FAS solicited comments on the reasonableness of the burden estimates from existing program stakeholders and received comments from the following individuals:

- Abhijeet Kulkarni, Almond Board of California, 209-343-3228, akulkarni@almondboard.com
- Lina M. Quesada-Ocampo, Ph.D., North Carolina State University, 919-513-3530, lmquesad@ncsu.edu

The respondents agreed that most of the burden estimates were reasonable and in line with their experiences, although they suggested that the burden estimates for some elements were low due to having to prepare and enter information in the UES system. FAS is aware that this has been a historical concern from many applicants, and launched a modernization of the UES system in 2023 to improve the overall experience for all participants in the FAS market development programs. This years–long effort will develop a completely new UES interface that addresses the consistent complaints and issues that participants have encountered when using the system. The first phase of the new interface was deployed April 4, 2025, with additional development and enhancements continuing for at least the next two years.

Given the concerns expressed by the respondents, FAS has increased the burden estimate for the time it takes to prepare an application from 24 hours to 40 hours.

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

The agency does not provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

Participants will be aware that information collected relating to this program is generally open for public inspection, but the agency may withhold information which could cause substantial competitive harm to the submitter under exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. 552(b)(4). It is also the agency’s policy, prior to responding to an FOIA request, to obtain and consider the views of the submitter of the information if the information submitted is not readily identifiable as privileged or private. If the agency disagrees with the views presented by the submitter, it will give the submitter sufficient time, prior to release of the information, to pursue legal action to prevent the release.

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.

There are no sensitive questions involved in this information collection.

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 in Item 13 of OMB Form 83–1.**

* **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 contraction out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The agency is requesting the estimated annual burden of 1,650 hours, this is based on separate estimates of five distinct areas of data collection: Proposals, project agreements with FAS, performance measurement, reimbursement claims, and office management records. TASC projects can last up to five years, and the burden estimates provided herein are calculated for the life of the award. The estimates used to determine the burden on the public are explained as follows:

a) Proposals. Proposals include separate assessments, projections, goals, etc., all of which make up a comprehensive proposal. The current estimate for one Participant to complete a proposal is 40 hours.

b) Project Agreements. The project agreement is a binding instrument and creates a legal obligation on the part of CCC to make funds available to the Participant. Participants will take approximately 2 hours to review the proposed contracts prepared by FAS, clear them with their lawyers, and return them to FAS.

c) Performance measurement. Participants are required to evaluate the effectiveness of their programs through interim and final reports to: (1) monitor performance of technical assistance projects, (2) evaluate the benefits and effects of these projects, and (3) document the experience gained from these activities for use in the design and implementation of future projects. Establishing good performance measures enables Participants to perform meaningful assessments. Based on these assessments, Participants and FAS program managers are better able to determine what changes are needed to improve program performance and designing future programs. Performance assessment reports? are expected to take 10 hours to prepare.

d) Reimbursement Claims. Participants submit claims to FAS whenever they feel their costs are of sufficient size to justify a claim for reimbursement. The reimbursement billing cycle varies by Participant depending on the level of activities and size of program. Participants are required to maintain receipts for all costs incurred for which reimbursement from project funds will be requested. The estimate of 8 hours for reimbursement claims includes all incidental office costs and procedures necessary to prepare and support each claim. Participants are required to maintain appropriate records for three calendar years after termination of the project agreement or five calendar years following the end of the year in which the transaction evidenced by the record took place, whichever is less.

e) Office Management Records. Participants are required to keep good office records available for audit. These records include such things as travel reports and receipts for all disbursements. Maintaining office records is estimated to take 6 hours.

The estimated total cost to all combined respondents is based on the following:

	DESCRIPTION	NUMBER OF RESPONDENTS	FREQ	TOTAL RESPONSE	AV HOURS PER RESP	TOTAL HOURS	COST PER HOUR*	COST TO PUBLIC
A)	Proposals	25	1	25	40	1,000	$76.21	$76,210.00
B)	Project Agreements	25	1	25	2	50	$76.21	$3,810.50
C)	Assessment	25	1	25	10	250	$76.21	$19,052.50
D)	Reimbursement Claims	25	1	25	8	200	$76.21	$15,242.00
E)	Office Management Records	25	1	25	6	150	$76.21	$11,431.50
		25	**-**	**125**	**-**	**1,650**	**-**	**$125,746.50**

*Average hourly cost is estimated at $76.21. This hourly cost is based on the national hourly average rate for Administrative Services and Facilities Managers provided in the Occupational

Employment and Wage Statistics (OEWS) tables found on BLS.gov. The hourly cost used in this estimate includes fringe benefits. The total annual estimated burden in dollars is $125,746.50.

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 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 the 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 collection 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 capital/start–up or ongoing operation/maintenance costs associated with this information collection.

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 12, 13, and 14 in a single table.

The estimated annual costs to the Federal Government, including fringe benefit costs, for all submissions found in the guidelines are as follows:

ITEM	ORG	GRADE	RATE *	HOURS	COST
A) Proposals	POD	13	$72.90	20	$1,458
	CoPD	13	$72.90	320	$23,328
B) Project Agreements	POD	13	$72.90	40	$2,916
	CoPD	13	$72.90	80	$5,832
C) Assessment	POD	13	$72.90	20	$1,458
	CoPD	13	$72.90	160	$11,664
D) Administrative Procedures	POD	13	$72.90	100	$7,290
TOTAL				**740**	**$53,946**

Note: POD refers to the Programs Operations Division of FAS. This office is responsible for administrative operation of the TASC program. CPD refers to the Commodity Program Division of FAS, which is responsible for review of application and evaluation content and day to day contact with program participants.

*The annual estimated cost to the Federal Government for this collection is $53,946, based on the 2025 GS-13 Step 10 hourly rate of $56.08 plus a 30% multiplier to create a fully loaded amount to account for fringe benefits, which represents the FAS staff reviewing information submissions.

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 of a currently approved information collection request. The currently approved estimates on OMB Burden Inventory for this collection are 25 estimated respondents annually with 25 estimated total annual responses and 1,250 estimated annual burden hours.

The agency is requesting 25 estimated respondents, 125 estimated total annual responses and 1,650 estimated total annual burden hours. The number of estimated respondents remains unchanged. However, there is an increase in the estimated total annual responses from 25 to 125, an increase of 100 estimated total annual responses, due to adjustments in the number of estimated total annual responses. Lastly, there is an increase in the estimated total annual burden hours from 1,250 to 1,650, an increase of 350 estimated total annual burden hours, this adjustment is directly related to the increased number of responses expected.

16. For collections of information whose 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 agency has no plans to publish any documents.

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.

The agency is not seeking approval to not display the OMB Control Number and Expiration Date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83–1.

There are no exceptions.