SUPPORTING STATEMENT - PART A for

OMB Control Number 0524-0039:

NIFA Application Kit

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1National Institute of Food and Agriculture U.S. Department of Agriculture OMB No. 0524-0039 NIFA Grant Application Kit

1SUBJECT: Supporting Statement for Paperwork Reduction Act Submission to Renew a Currently Approved Information Collection

A. <u>JUSTIFICATION</u>

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The United States Department of Agriculture (USDA), National Institute of Food and Agriculture (NIFA) sponsors ongoing research, education, and extension programs under which competitive, capacity, and high-priority special awards are made. These programs are authorized pursuant to the authorities contained in the National Agricultural Research, Extension, and Teaching Policy Act of 1977, as amended (7 U.S.C. 3101), the Smith-Lever Act, and other legislative authorities.

Before awards can be issued, certain information is required from applicants as part of an overall application. In addition to a project summary, proposal narrative, vitae of key personnel, and other pertinent technical aspects of the proposed project, supporting administrative and budgetary documentation also must be provided. This information is obtained via the use of federal-wide standard grant application forms and NIFA-specific application forms. Because competitive applications are submitted, many of which necessitate review by peer panelists, it is particularly important that applicants provide the information in a standardized approach.

NIFA receives applications through Grants.gov and uses standard forms in the SF-424 Research and Related form family and the SF-424 mandatory form family along with agency-specific forms. Submission through Grants.gov also requires a registration process which includes registering on the General Service Administration (GSA) website, System for Award Management (SAM).

2. PURPOSE AND USE OF INFORMATION.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The fundamental purpose of the information requested is to provide applicants with the ability to supply information that is not obtained in the federal-wide application forms but is necessary for the NIFA proposal and award process. The information is reported to NIFA at the time of award application. Information is used by NIFA to ascertain eligibility and respond to inquiries from Congress, other governmental agencies, and the grantee community. Following are detailed descriptions of the types of forms and uses of information requested:

Letter of Intent Form: The Letter of Intent (LOI) form is used by program staff for program planning and to provide feedback to applicants on the relevance of their project proposal to the request for application. The LOI specifically asks for the following project details: the title, the rationale behind the creation, goals and objectives, approach, and desired impacts or outcomes. Program staff use the LOI to determine the potential number of full applications and the potential distribution of applications across the specific science domains covered by the request. Program staff are then able to more effectively plan for the number of panelists and their scientific expertise. The applicant is either encouraged or discouraged to submit a full application after review of the LOI by NIFA program staff. The LOI process provides valuable feedback to applicants in judging whether they should commit additional time to the preparation of a full application. Submission of an LOI is required for all grant types except conference grant applications. Applicants who do not submit the LOI by the submission date specified in the Request for Applications are not permitted to submit a full grant application to that program in that fiscal year.

<u>Supplemental Information Form</u>: This form is used in all grant application packages and collects the funding opportunity and program names and codes to which the applicant is applying, applicant type information, key words, and any conflict-of-interest details as an attached file. A minor change was made to this form from the last collection—to comply with the May 5, 2025 Executive Order 14292, Improving the Safety and Security of Biological Research, a certification check box was added to indicate whether the research described in the project proposal includes any research of concern.

Agriculture and Food Research Initiative (AFRI) Project Type Form: This form is used principally by the AFRI Grants Program to collect the specific type of project (i.e., research, education, extension or integrated) and type of grant (i.e., standard, coordinated agricultural, planning/coordination, conference, Food and Agriculture Science Enhancement (FASE) being submitted. The form also allows for manual entry of an "other" of grant type field.

<u>Form NIFA–2008</u>, <u>Assurance Statement(s)</u>: This form is used in formula grant programs and provides the required assurances of compliance with regulations involving the protection of human subjects, animal welfare, and recombinant DNA research.

<u>Form NIFA-2010</u>, <u>Fellowships/Scholarships Entry/Exit Form</u>: NIFA has determined that this form is no longer necessary and is requesting its removal from this information collection renewal.

In addition, the following are NIFA-specific application forms that NIFA would like to add to this information collection and permit the use of during the application process:

<u>Confidentiality Agreement:</u> This form will be used for applicants to certify they do not require any employees, contractors, or subrecipients seeking to report fraud, waste, or abuse to sign or comply with internal confidentiality agreements that would restrict said entities or individuals lawfully reporting fraud, waste, or abuse. The basis for this representation is a prohibition in sections 743 and 744 of the Consolidated Appropriations Act of 2016, Pub. L. 114-113.

<u>Conflict of Interest List:</u> This form requests that any project director or other person that the Request for Applications (RFA a/k/a Notice of Funding Opportunity) specifies complete a list of individuals who have co-authored or collaborated on projects within the past three years, all thesis or postdoctoral advisees or advisors, and all others in the project director's, etc. field with whom there has been a consulting, financial, or any other potential conflict of interest arrangement in the past three years. This is required to assist NIFA in determining conflict of interest situations that may affect award consideration.

<u>Current and Pending Support</u>: The form requests each project director or other senior personnel specified in the RFA list information for all active and pending projects they are involved with, including the proposed project.

<u>Project Summary:</u> This form requests a list of the project director and all co-project directors along with a summary of the overall project goal and supporting objectives, plans to accomplish the project goal, and relevance of the project to the goals of the program.

<u>Specialty Crop Research Initiative (SCRI) Executive Summary:</u> This form is specific to SCRI applicants. The form requests a SCRI project summary that includes the project title, project type (i.e., planning), which legislatively mandated focus areas will be addressed by the project proposal, a list of project staff, a summary of an outreach plan, and a description of how the project fulfills specific program requirements.

USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

NIFA makes every effort to comply with the E-Government Act, 2002 (E-Gov) (Pub. L. 107-347) and to provide for alternative submission of information collections.

NIFA has been involved in activities under Pub. L. 106-107, Federal Financial Assistance Management Improvement Act of 1999. The purposes of this law were to:

- improve the effectiveness and performance of Federal grant programs,
- simplify grant application and reporting requirements,
- improve the delivery of services to the public, and
- facilitate greater coordination among those responsible for delivering such services.

Since Pub. L. 106-107 expired in November 2007 the Grants Policy Committee has continued to build on this momentum, advancing existing efforts and leveraging new opportunities to enhance Federal financial assistance. These efforts have resulted in a common electronic portal at Grants.gov (www.grants.gov) for organizations to find and apply for grant programs. Grants.gov is the Federal Government's single site for grantmaking agencies and organizations to publish grant funding opportunities and application packages online. Grants.gov enables the grant community to search for grant opportunities, and download, complete and electronically submit applications. In partnership with federal grant-making agencies and the applicant community, Grants.gov established Standard Forms 424 (SF-424) form families as the core government-wide standard data sets and forms for grant application packages. NIFA uses forms available through SF-424 Research and Related (R&R) form families. In addition, NIFA also uses standard agency-specific forms to satisfy agency collection needs and has made both the Supplemental Type Form and the Agriculture and Food Research Initiative (AFRI) Project Type Form available on grants.gov. Electronic submission is required unless exceptions are warranted.

4. EFFORTS TO IDENTIFY DUPLICATION.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

NIFA's use of the federal-wide forms in the SF-424 Research and Related form family and the SF-424 family reduced duplication instances and leveraged federal application submission standards. NIFA continues to analyze the data elements in its agency-specific forms to determine if further streamlining is possible. Additionally, each application package submission is a new request in response to a published request for application notification or notice of funding opportunity; there is no similar or existing information that could be used or modified to duplicate the purpose for which this information is used.

5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.

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

1Small Businesses do submit grant applications to some of NIFA programs. Approximately 400 small businesses apply for NIFA funding each year. All efforts are made to collect only the necessary information required to ensure NIFA is in compliance with the rules for the proper administration of the Small Business Innovation Research Program (SBIR). NIFA does use the standard form developed by Grants.gov for

collection of SBIR grant application data. This is a recognized federal-wide standard form for the collection of SBIR data.

6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.

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

Information is collected only when the applicant chooses to submit an application to NIFA for consideration for a federal financial assistance award, therefore it is not feasible to collect the information less frequently. The information collected is required as part of the application process. Since the information is collected only when the applicant initially applies for funding through NIFA, it would not be feasible to collect it less frequently. If NIFA does not collect this information, it cannot perform the agency's statutory grant funding requirements. Additionally, NIFA would be unable to properly screen applications, carry out necessary evaluation processes, perform any administrative review of applications recommended for award, or process and issue awards within any pre-established timeframe(s).

7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- 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.

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

8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The notice of intent to revise this information collection appeared in the *Federal Register* on Tuesday, July 8, 2025 (Vol 90 No. 128). One public comment was received in response to the 60-day Federal Register Notice. The comment was related to NIFA practices in general and not specific to this or any collection. NIFA has reviewed the comment and has taken commenter input into consideration. No further action is required.

CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY

NIFA consulted with applicants to determine burden estimates on the components of this collection as well as the usability of the forms. NIFA also coordinates with Grants.gov and with the Research and Related Working Group on forms changes and implementation issues related to NIFA's use of standard grant forms in the SF-424 form families.

After requesting stakeholder feedback from numerous stakeholders multiple times, one stakeholder responded with feedback. The NIFA stakeholder provided input that the Current and Pending Support form would be easier to fill out if it were formatted like the Conflict-of-Interest form and that some form instructions could be more robust in his opinion but that currently there is no issue in navigating the existing instructions. All feedback has been considered and no other changes were made to this collection.

NIFA has consulted with the following people regarding this collection:

Todd R. Callaway

Professor University of Georgia Todd.callaway@uga.edu

9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.

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

The agency does not provide payments or gifts to respondents, other than remuneration of contractors or grantees.

10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.

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

There is no data that will be released. The information in this collection is available only to NIFA staff to ensure that grantees are complying with application requirements and legislative reporting requirements.

The agency has determined this request does not need to be reviewed by the Privacy Officer and this request complies with the Privacy Act of 1974.

11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No sensitive information is being collected. Any information collected is available only to NIFA staff. In addition, the agency has determined that the request does not need to be reviewed by the Privacy Officer and complies with the Privacy Act of 1974 (5 U.S.C. 552(a)).

12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

The estimate of burden was determined through survey responses with applicants. The burden for each component is estimated in the tables below:

Estimated Annual Burden – Table 1

Form Description	Estimated Number of Respondents	Estimated Number of Responses Per Respondent	Estimated Total Annual Responses	Estimated Hours per Response	Estimated Annual Burden Hours
Letter of Intent	3000	1	3000	2	6000
NIFA-2008 Assurance Statement	3000	1	3000	0.5	1500
Supplemental Information Form	6000	1	6000	2	12,000
AFRI Project Type	2,500	1	2,500	0.25	625
Confidentiality Agreement	3000	1	3000	0.25	750
Conflict of Interest List	3000	1	3000	0.5	1500
Current & Pending Support	3000	1	3000	1	3000
Project Summary	3000	1	3000	0.5	1500
SCRI Executive Summary	50	1	50	0.25	13
Total	26,550		26,550		26,888

	OMB
Component Name	Control
	Number
SF 424 (R&R)	4040-0001
Research And Related Senior/Key Person Profile (Expanded)	4040-0001
(Inclusive of the Current and Pending Attachment)	
SF-LLL Disclosure of Lobbying Activities	4040-0013
Research & Related Other Project Information	4040-0001
(Inclusive of the Project Summary Attachment)	
Key Contacts Form	4040-0010
Project Abstract	4040-0010
Research & Related Personal Data OMB # 4040-0001	4040-0001
Research & Related Budget OMB # 4040-0001	4040-0001
R&R Total Fed + Non-Fed Budget OMB # 4040-0001	4040-0001
Research & Related Subaward Budget (Total Fed + Non-Fed)	4040-0001
Attachment(s)	
R & R Subaward Budget Attachment(s) Form	4040-0001
SBIR/STTR Information	4040-0001
Project/Performance Site Location(s)	4040-0010
Budget Information - Construction Programs (SF-424C)	4040-0008

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

Annualized Cost to Respondents* - Table 2

Form	Avg.	Avg.	Total	Total	Annual Burden
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Description	Hourly	Hours/Response		Responses/Year	Cost
	Wage				
Letter of Intent	\$78.40	2	\$156.80	3000	\$470,400
NIFA-2008					
Assurance					
Statement	\$78.40	0.5	\$39.20	3000	\$117,600
Supplemental					
Information					
Form	\$78.40	2	\$156.80	6000	\$940,800
AFRI Project					
Type	\$78.40	0.25	\$19.60	2500	\$49,000
Confidentiality					
Agreement	\$78.40	0.25	\$19.60	3000	\$58,800
Conflict of					
Interest List	\$78.40	0.5	\$39.20	3000	\$117,600
Current &					
Pending					
Support	\$78.40	1	\$78.40	3000	\$235,200
Project					
Summary	\$78.40	0.5	\$39.20	3000	\$117,600
SCRI					
Executive					
Summary	\$78.40	0.25	\$19.60	50	\$980
Total					\$2,107,980

*Hourly labor rates data was taken from the 2024-2025 American Association of University Professors Faculty Salary Report. The average annual associate level professor salary of \$119,801 was used. This estimate accounts for the cost of fringe benefits for the respondents.

Based on an average faculty hourly wage of \$78.40 NIFA estimates the total annual cost incurred by these collection requirements to be \$2,107,980.

13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/startup costs or ongoing operation/maintenance costs associated with this information collection.

14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Total Cost to Government - Table 3

Estimated Totals Cost to NIFA - Job Title	Action	Hourly Pay	Hours per Transaction	Total Applications/ Grants	Estimated Costs
Program Assistant, GS-7	Clears exceptions, assembles official jacket	\$27.57	.33	6,200 applications	\$56,408
Program Specialist, GS-11	Evaluates applications for preliminary review and assures all forms have been completed	\$40.81	.50	6,200 applications	\$126,511
Program Manager, GS-15	Evaluates applications, coordinates application reviewers, makes final funding decisions	\$80.84	5	6,200 applications	\$2,506,040
Grants and	Reviews	\$48.91	4.25	3,000 grants	\$623,603

Agreemen	administrati		
ts	ve aspects		
Specialist,	prior to final		
GS-12	award		
	decisions,		
	checks		
	budget		
	amounts,		
	certifications		
	, and related		
	items		
Total			\$3,212,624

Dollar amounts derived from the 2025 Federal Pay Tables for Kansas City-Overland Park-Kansas City, MO-KS assuming a step five for each grade level.

15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.

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

The increase in the burden amounts are due to the increased volume of applications submitted to NIFA for all grant programs utilizing the application kit.

16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.

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

NIFA does not currently plan to publish any reports using the information in this collection.

17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.

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

NIFA is not seeking an exemption from displaying the OMB approval date on the form.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

There are no exceptions to item 19 of OMB Form 83-I.