

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number: 0578-0033**

**Composting and Food Waste Reduction (CFWR) Cooperative Agreement**

Sharonte Williams

USDA, Natural Resources Conservation Service

3737 Government St.

Alexandria, LA 71302

**United States Department of Agriculture  
National Resource Conservation Program  
Supporting Statement  
Composting and Food Waste Reduction Cooperative Agreements (CFWR)  
OMB Control Number: 0578-0033**

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

NRCS is requesting a revision of a currently approved collection for Composting and Food Waste Reduction (CFWR) Cooperative Agreements.

The Agriculture Improvement Act of 2018 (2018 Farm Bill; Pub L. 115-334) authorized the Farm Production and Conservation (FPAC) mission area and the Natural Resources Conservation Service (NRCS) to carry out pilot projects under which local and municipal governments enter into cooperative agreements to develop and test strategies for planning and implementing municipal composting plans and food waste reduction plans. This collection enables program staff to collect data in a unified format across projects – no new information is being collected outside of requisite grants.gov forms and one custom form for programmatic reporting (NRCS-OUAIP-1). The reporting form simply provides standardization in order to better determine program efficacy and efficiency.

**2. Indicate how, by whom and for what purpose the information is to be used. Except for new collections, indicate the actual use the Agency has made of the information received from the current collection.**

NRCS is using the information to determine whether participants meet the eligibility requirements to be a recipient of grant funds and to monitor and evaluate project performance. Lack of adequate information to make the determination could result in the improper administration and appropriation of Federal grant funds.

The information collection requirements are described in the Reporting and Recordkeeping requirement.

Project Summary

NRCS requires applicants to provide descriptive narrative detailing the proposed project. Applicant input and summary information is used to evaluate proposals and to produce the Notification of Award. Estimated burden time: 1 hour per awardee.

Negotiated Indirect Cost Rate Agreement (NICRA)

All awardees requesting reimbursement of indirect costs, who have an existing NICRA, must provide this document with their application. Estimated burden time: 0.25 hour per awardee requesting indirect costs.

### De Minimus Rate Agreement

NRCS requires all grant recipients requesting reimbursement of indirect costs, who do not have an existing NICRA, to provide an attestation that they will utilize the 10% De Minimus Rate when calculating indirect costs. Estimated burden time: 0.25 hour per awardee requesting indirect costs who does not have a NICRA.

### Annual Progress Reports

NRCS requires all grant recipients to submit an annual report detailing progress, challenges, and key milestones. Estimated Burden time: 1 hour per awardee per response.

### Notice of Award

NRCS requires all grants recipients to sign the Notice of Award. Estimated Burden Time: 0.5 hour per awardee.

### **Collections Approved under Other OMB Control Numbers**

The following table summarizes the information collection for which approval has been obtained under the OMB Control Number for another CFR part.

Description	Approved Under
SF-424, Application for Federal Assistance	4040-0020
SF-424A, Budget Information Non-Construction	4040-0006
SF-425, Financial Status Report	4040-0014
SF-270, Request for Advance and Reimbursement	4040-0012
Certificate Regarding Lobbying	4040-0013
SF-LLL, Disclosure of Lobbying Activities	4040-0013

**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 of the decisions for adopting this means of collection. Also describe any consideration of information technology to reduce burden.**

CFWR cooperative agreements provide information using forms that are approved for government-wide use and available in electronic form on Grants.gov.

Non-form information collections are mostly limited to copies of documents in the CFWR award activities' possession or providing written replies to agency requests or offers. Non-form collections, as well as all forms, may be submitted by email.

**4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There is no duplication of information involved with collecting applications, processing applications, or monitoring of the CFWR projects. CFWR recipients provide information on a regular basis to NRCS to comply with reporting requirements.

**5. Methods to minimize burden on small businesses or other small entities (Item 5 of the Reporting and Recordkeeping Requirements), describe any methods to minimize the burden.**

It has been determined the collection will not have a significant economic impact on a substantial number of small entities since it contains normal business recordkeeping requirements and minimal essential reporting requirements.

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

The regulation requires the minimum information needed to determine whether CFWR program applicants are eligible for an award and to conduct adequate performance monitoring and reporting. This minimum reporting of information is necessary for the NRCS to administer the CFWR in an efficient and cost-effective manner while ensuring sufficient program analysis.

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

- a) Requiring respondents to report information more frequently than quarterly. There are no information collection requirements that require information more frequently than quarterly.
- b) Requiring written responses in less than 30 days. There are no information collection requirements that require written responses in less than 30 days.
- c) Requiring more than an original and two copies. There are no information collection requirements that require more than an original or single copy of a document.
- d) Requiring respondents to retain records for more than 3 years. There are no such requirements.
- e) No utilizing statistical sampling. There are no such requirements.
- f) Requiring the use of statistical sampling which has not been reviewed and approved by OMB. There are no such requirements.
- g) Requiring the pledge of confidentiality. There are no such requirements.
- h) Requiring submission of propriety trade secrets. There are no such requirements.

**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.**

The Federal Register notice was published on July 24, 2025 (90 FR 34833).

One comment was received. The comment concerned programmatic implementation in regards to tracking deliverables being specific indicators and has been taken under advisement. NRCS staff is continuing to monitor the grantees or awardees on the information collection for any improvements. NRCS is also maintaining close contact with grantee and provides guidance and advice on issues as they occur.

**Describe efforts to consult with persons outside the Agency to obtain their view on availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on 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 three 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.**

These municipalities, are current CFWR awardees, they were required to complete and submit all program forms prior to award execution. Their feedback confirms that the information collection remains necessary, clear, and manageable, consistent with prior reporting periods. Broader consultation was limited to active awardees, as only these entities are directly responsible for compiling and submitting the required records. This ensures that the consultation reflects the most relevant and current stakeholders impacted by the information collection requirements.

- Haverford Township, [HavCompost@gmail.com](mailto:HavCompost@gmail.com), 203-695-2967
- City and County of Denver, [lesly.baesens@denvergov.org](mailto:lesly.baesens@denvergov.org), 202-390-8950
- City of Decatur, [rweil@decaturil.gov](mailto:rweil@decaturil.gov), 217-424-2747

## **9. Explain any decision to provide any payment or gift to respondents.**

There is no payment, or gift was given to respondents.

## **10. Describe any assurance of confidentiality provided to the respondents and the basis for the assurance in stature, regulation, or Agency policy.**

The information collected for the Composting and Food Waste Reduction (CFWR) Cooperative Agreements is authorized by the Agriculture Improvement Act of 2018 (2018 Farm Bill; Pub L. 115-334) and section 1619 of the Act. This collection enables program staff to collect data in a unified format across projects – no new information is being collected outside of requisite grants.gov forms and one custom form for programmatic reporting (NRCS-OUAIP-1). The reporting forms provide standardization to better determine program efficacy and efficiency. All data collection and sharing will adhere to the Privacy Act of 1974 (5 USC 552a, as amended) and the Freedom of Information Act, ensuring confidentiality and protection of personal information.

This request was reviewed and approved by FPAC Assistant Privacy Act Officer (APO) for Privacy Act compliance, Samantha Jones, on July 8, 2025.

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

The information collected under this docket is financial or programmatic in nature and is a required condition for the receipt of federal grant funds. Participants disclose financial information as well as information of their business operations. However, the information collected is required to participate in the program activities, to ensure program integrity and to properly administer federal funds.

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

The estimate of hour burden for 100 Individuals/Households for the information collection as provided in the Reporting and Recordkeeping Requirements spreadsheet submitted with this request, is as follows:

Total number of Unduplicated Respondents	100
Estimated Frequency per Respondents	11.25
Total Annual Responses	1,125
Estimated Time per Respondents	0.24978
Total Annual Burden Hours	281

Respondent cost per hour was derived by using U.S. Bureau of Labor Statistics Occupational Employment and Wages, May 2024 11-9013 Farmers, Ranchers, and Other Agricultural Managers. The U.S. mean household income, as measured by the Bureau of Labor, is \$46.75 per hour. Fringe benefits for all private industry workers are an additional 29.9 percent,<sup>1</sup> or \$13.98, resulting in a total of \$60.73 per hour. The estimated respondent cost is determined by multiplying the hourly rate by the hours per response identified in the Recording and Recordkeeping spreadsheet which equals \$17,065.13 (281 hours x \$60.73).

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

The regulation and associated information collection place no burden costs on respondents for capital, start-up, operation, maintenance, or the purchase of services.

---

<sup>1</sup> U.S. Bureau of Labor Statistics. "Employer Costs for Employee Compensation." News release. March 2022. <https://www.bls.gov/news.release/eccec.htm>.

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

NRCS employees supporting CFWR obtaining and report the information needed. Employees review the information provided to effectively administer federal grant funds according to applicable rates and regulations. It is estimated that employees spend 2 hours on information submitted from each CFWR applicant and an additional 2 hours on information submitted by each CFWR awardee.

National employee cost per response is equal to 1 hour multiplied by \$50.50 (estimated national employee average hourly wage based on 2025 General Schedule, Grade 13, Step 5 base rate). Fringe benefits for all government workers are an additional 31.2 percent, or \$16.16 resulting in a total of \$66.66 per hour. The total annualized cost to the Federal Government is \$18,731.46 (\$66.66 x 281 responses).

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

The agency is seeking a revision request. The current burden inventory is 724 estimated annual respondents; 724 estimated annual responses; and 5,353 estimated annual burden hours and the renewal request is seeking 100 estimated annual respondents; 1,125 estimated annual responses; and 281 estimated annual burden hours. This reflects both a decrease in the number of estimated respondents (-624) and estimated annual burden hours (-5,072), as well as an increase in the estimated number of annual responses (+401) since the last OMB submission. These changes are the result of both program changes (correction of tabulation errors and recalculation of review/data entry processes) and program adjustments (reduction in new agreements and funding opportunities).

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

The information collections under this OMB control number may be published to public-facing USDA websites, including project information located at [www.farmers.gov/urban](http://www.farmers.gov/urban), and/or included in routine Congressional reports.

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

The agency doesn't have any standardized forms and will comply with the PRA if it chooses to create forms for OMB approval.

**18. Explain each exception statement to the certification statement.**

There are no exceptions requested.