

**The Supporting Statement for OMB 0596-0257**  
Community Wood Energy and Wood Innovation Program (CWEWIP)

-

## Terms of Clearance

### A. Justification

- 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.**

USDA Forest Service is delivering the Community Wood Energy and Wood Innovation Program (CWEWIP) to support the Rural Revitalization Technologies [7 U.S.C. Sec. 8113](#) and Agriculture Improvement Act of 2018 [Pub. L. 115-334 Sec. 9013](#), and Infrastructure Investment and Jobs Act (Bipartisan Infrastructure Law) [Pub. L. 117-58 Div. J Title VI](#) which directly support the installation of thermally led community wood energy systems or development and expansion of innovative wood product facilities. The intent of the CWEWIP is to support forest health and stimulate local economies by expanding renewable wood energy use and innovative wood products manufacturing capacity. According to 2 CFR Part 200 and Forest Service Handbook 1509.11, Chapter 20, prescribes administrative requirements and processes applicable to all Forest Service domestic and international Federal Financial Assistance awards to State and local governments, institutions of higher education, hospitals, private profit and nonprofit organizations, individuals, and foreign recipients.

- 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.**

- a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

Eligible applicants are non-profits; local, state, and tribal governments; businesses, companies, corporations (for profit); institutions of higher education; and special purpose districts (public utility districts, fire districts, conservation districts, school districts, and ports.)

The full application package (Part I and Part II) is to be submitted by email to the respective Forest Service Regional Coordinator (see table with list of Regional Coordinators) in the Forest Service Region your State resides. Forest Service Regional Foresters will rank proposals according to regional priorities. A panel of Federal experts or their designees will perform a thorough technical review of eligible proposals and evaluate the proposals according to the criteria outlined in this announcement. Reviewers independently evaluate proposals for merit and assign a score using the criteria listed in the CWEWIP Instructions. Both the Regional Foresters rankings and the review panel evaluations will be submitted to the Forest Service national leadership for a final decision. In addition, the Forest Service may consider performance and status of previous or ongoing Wood Innovations grants and other Federal grants and awards in making

awards under this program and authority.

Forest Service Regional Coordinators:

**Forest Service Northern Region (Region 1)** MT, ND, Northern ID, & Northwestern SD

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**Forest Service Rocky Mountain Region (Region 2)** CO, KS, NE, SD, & WY

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**Forest Service Intermountain Region (Region 4)** Southern ID, NV, UT, & Western WY

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**Forest Service Pacific Southwest Region (Region 5)** CA, HI, Guam, and Trust Territories of the Pacific Islands

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**Forest Service Pacific Northwest Region (Region 6)** OR & WA

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**Forest Service Southern Region (Region 8)** AL, AR, FL, GA, KY, LA, MS, NC, OK, SC, TN, TX, VA, Virgin Islands, & Puerto Rico

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**Forest Service Eastern Region (Region 9)** CT, DE, DC, IL, IN, IA, ME, MD, MA, MI, MN, MO, NH, NJ, NY, OH, PA, RI, VT, WV, WI

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**Forest Service Alaska Region (Region 10) AK**

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Within the project narrative, applicants will be asked to provide the following information.

1. Project Title.
2. Project Length.
3. Project Abstract.
4. Statement of need.
5. Specific goals and objectives in bullet format.
6. Describe how the proposed project responds to the CWEWIP goals and intent listed in the instructions.
7. Describe the specific project work activities or tasks that will be carried out in order to accomplish and meet the goals and objectives.
8. Describe the timeline for project activities.
9. Describe how progress will be measured.
10. Describe any subgrant or subcontracting activity.
11. Describe communication and outreach activities.
12. List anticipated project outcomes, deliverables, and desired results.
13. Describe anticipated impacts on forest health, including how the project will create demand for low-value wood, low-quality wood, industrial residues, or timber in areas of the U.S. in need of forest restoration.
14. Describe anticipated impacts on local economies.
15. Specify whether the project supports an existing or new sawmill or forest products business located in a geographic area with an average annual unemployment rate that is more than one percent higher than the national average unemployment rate in calendar year 2019.
16. If applicable, explain how the project supports, benefits, or engages communities that are historically underserved, marginalized, and adversely affected by persistent poverty or inequality (pursuant to Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government).
17. For community wood energy system or innovative wood product facility projects, describe or provide information to the following criteria:
  - a. Energy efficiency and cost effectiveness of the system or facility.

- b. Extent to which the system or facility represents the best available commercial technology.
  - c. Extent to which the applicant has demonstrated a high likelihood of project success by completing detailed engineering and design work in advance of the grant application.
18. For community wood energy system projects only (in addition to above criteria):
- a. Extent to which the system will displace conventional fossil fuels, minimize emission increases to the greatest extent possible, and use the most stringent control technology that has been required or achieved in practice for a wood-fired boiler of similar size and type.
  - b. Extent to which the proposed community wood energy system will increase delivered thermal efficiency of systems being replaced.
19. List key personnel qualifications and role(s) in the project. Describe their capabilities, certifications, and experience on related projects that demonstrate your team has the appropriate skill set and experience for success. List any experience and performance of prior funded U.S. Forest Service project(s).
20. Describe planned reports, documents, and success stories that will be provided during and at the end of the project for public posting. List the contact information for the person(s) responsible for reporting.
21. Complete the two budget tables below and provide a brief budget narrative explaining primary costs and any subcontracting. The budget should support the narrative statement and reflect projected costs. Include cash, in-kind services, and staff time used to complete the project.

In total the project narrative and budget table along with appendices will be requested from applicants. This information will be used to determine eligibility and need for financial assistance of applicants.

To comply with federal grant requirements, the USDA Forest Service will also require applicants complete the following standard forms when applying for financial assistance.

- a. FS-1500-0051: Community Wood Funding Opportunity Application
- b. Screenshot of an active or in-process SAM.gov registration
- c. SF-424: Application for Federal Assistance
- d. SF-424A: Budget Information for Non-Construction Programs
- e. SF-424B: Assurances for Non-Construction Programs
- f. FS-1500-35: Certificate Regarding Lobbying Activities
- g. FS-1500-22: Financial Capability Questionnaire

To comply with federal grant reporting requirements, successful applicants will need to file quarterly interim project progress reports along with the SF-425: Federal Financial Report.

- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Information	Description	Information	Prepared by
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Collected		Provided to:	
Individual	FS-1500-0051: Community Wood Funding Opportunity Application	USDA Forest Service	Public, State, and Tribal
Individual	Screenshot of an active or in-process SAM.gov registration	USDA Forest Service	Public, State, and Tribal
Individual	SF-424: Application for Federal Assistance (OMB 4040-0001)	USDA Forest Service	Public, State, and Tribal
Individual	SF-424A: Budget Information for Non-Construction Programs (OMB 4040-0006)	USDA Forest Service	Public, State, and Tribal
Individual	SF-424B: Assurances for Non-Construction Programs (OMB 4040-0007)	USDA Forest Service	Public, State, and Tribal
Individual	FS-1500-35: Certificate Regarding Lobbying Activities (OMB 0596-0217)	USDA Forest Service	Public, State, and Tribal
Individual	FS-1500-22: Financial Capability Questionnaire (OMB 0596-0217)	USDA Forest Service	Public, State, and Tribal
Individual	FS-1500-23: Optional Project Performance Report (OMB 0596-0217)	USDA Forest Service	Public, State, and Tribal
Individual	SF-425: Federal Financial Report (OMB 4040-0014)	USDA Forest Service	Public, State, and Tribal

**c. What will this information be used for - provide ALL uses?**

Information will be used to evaluate eligibility and financial assistance need of applicants. In addition, the information collection will be used to produce maps illustrating where the projects will be implemented.

**d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

Information will be collected using electronic forms submitted by email to the respective Forest Service Regional Coordinator (see table with list of Regional Coordinators) in the Forest Service Region your State resides. No other forms of submitting applications for financial assistance will be accepted.

**e. How frequently will the information be collected?**

The information will be collected each time a notice of funding opportunity is issued and when annual reporting is required.

**f. Will the information be shared with any other organizations inside or outside USDA or the government?**

The information will be shared inside the USDA. Locations of the funded projects, funding award, and an abstract of the project will be shared with the public by two public facing USDA interactive project maps: [USDA Energy Investment Map](#) and the [Wood Innovations Project Data Map](#). Other information such as non-confidential or nonproprietary may be shared in ordinary course of federal business

**g. If this is an ongoing collection, how have the collection requirements changed over**

time?

There have been no changes to the collection requirements since the emergency approval.

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.**

The information is collected through electronic submission of the application form using email to the respective Forest Service Regional Coordinator (see table with list of Regional Coordinators) in the Forest Service Region your State resides.

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.**

Information collected for this Notice of Funding Opportunity (NOFO) is separate and not replicated in other USDA Forest Service NOFOs since this NOFO originates directly from the Agriculture Improvement Act of 2018 Pub. L. 115-334.

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

Forest Service Regional Coordinators maintain continuous contact with numerous eligible applicant partners within their Region, providing education and awareness of the program. They offer and provide assistance to all potential applicants who request assistance in understanding the program requirements and will review applications for completeness ahead of the submission date for any potential applicant who requests such review.

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.**

According to 2 CFR Part 200 and Forest Service Handbook 1509.11, Chapter 20, prescribes administrative requirements and processes applicable to all Forest Service domestic and international Federal Financial Assistance awards to State and local governments, institutions of higher education, hospitals, private profit and nonprofit organizations, individuals, and foreign 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;**

Annual financial and project reporting is required as part of this NOFO. The Forest Service will comply with post-award reporting requirements as required per OMB M-22-12.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **Requiring respondents to submit more than an original and two copies of any document.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **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;**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **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**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- **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 1320.6.

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 60-day Federal Register Notice request for public notice and comment was published in the Federal Register on May 17, 2023, 88 FR 31481. No comments were received.

**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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Public consultation on the Community Wood application form (FS-1500-0051) was conducted with organizations that included the Forest Business Network, Wisconsin Department of Natural Resources, and Wilson Engineering Services. Each of these three

organizations provided detailed input on the positive and negative aspects of form FS-1500-0051. Overall, no organization that provided input stated the application was too long or was requesting an unnecessary amount of information. The entirety of the feedback, by organization, is provided below.

Forest Business Network - I feel that the forms are easy to understand and are not too lengthy or arduous. My only suggestion for improvement is for the forms to allow electronic signature. I love the fillable forms, but after filling out the form, then having to print it out, sign, then scan is very time-consuming.

Wisconsin Department of Natural Resources –

1. Page 1. Make sure the process of registering for SAM stands out within the instructions maybe make it bold. As it currently is provided the applicant might browse over it.
2. Page 1. 3. D. Add in See page 10 for Table 1.
3. Page 3. The bottom section should have an additional guidance for the applicant to see the top of page 4 when applying for Community Wood. Or add bottom statement to the top of Page 4.
4. Page 4. F. “LIST THE CONTACT INFORMATION FOR THE PERSON(S) RESPONSIBLE FOR REPORTING.” Is that all is needed in F? As written it sounds like only contact information is required here. If that is it then bold or italicize the line so it stands out better.
5. Page 11. Bold or italicize the line in Category 1. Personnel. “Show job titles and estimated days or hours and the estimated cost per day or hour.”
6. Page 12. Bold or italicize the line in Category 2. Fringe Benefits. “Provide the rate and total estimated cost.”
7. Page 12. Bold or italicize the line in Category 3. Travel. “Show anticipated trips, number of travelers, and an estimated per trip.”
8. Page 13. Bold or italicize the line in Category 4. Equipment. “Provide documentation of equipment costs.”
9. Page 14. Bold or italicize the line in Category 5. Supplies/Materials. “Provide an estimate of the supplies and materials that may be purchased for the project.”
10. Page 15. Bold or italicize the line in Category 6. Contractual. “List out any estimated



costs for contracts or subawards with a description of the work for each anticipated contract.”

11. Page 16. Should this be Category 7?
12. Page 17. Bold or italicize the following lines to make stand out. “Below are required items that must be included in the Appendices.” “Letter of support etc.”
13. “Registration may take several months to complete or renew, and it must be completed before an award announcement.” Like I mentioned before best to make the SAM registration information easy to find for the applicant.
14. Page 17. As this is shown I am confused if the application is asking the applicant to add in definitions they need for the proposal or the definitions of Community Wood Energy System, Innovative Wood Product Facility and Mass Timber are defined in that section. Make more clearer on the ask for the applicant in the appendix section.

Wilson Engineering –

1. Consider limiting the amount of characters or space to not exceed the available printable space so the scroll bar doesn’t need to be used.
2. One person had challenges with the scroll bar/fillable sections. We didn’t have challenges with the scroll bar when using the Adobe Pro version, but we only spring for the expensive version for a couple people since it is pretty costly.
3. Possible reordering suggestion for page 1:
  - A: Total Project Capital Cost = \_\_\_\_
  - B: Maximum allowable Forest Service funding request (Line A x 35%) = \_\_\_\_
  - C: Requested Forest Service funding (must be less than or equal to Line B, else see Line F) = \_\_\_\_
  - D: Cooperator Funding = \_\_\_\_
  - E: Cooperator Funding as a Percentage of Total Capital Costs (Line D / Line A x 100%) = \_\_\_\_%
4. Page 17: “Letters of Support” could be bolded to match the other appendix requests.
5. Page 17: Is “Definitions” an appendix that should be included? Or does it need to be more clearly a next section of the document?
6. Page 18: Anticipated project start date listed as around August 2023, is this correct?

**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.**

This collection is a renewal of an emergency collection and three years has not passed.

**9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.**

No payment or gifts are provided.

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

The following statement is provided in the Instructions for the Notice of Funding Opportunity.

“Confidentiality: Materials submitted to the Forest Service, such as grant applications and progress reports, are subject to the Freedom of Information Act (FOIA). Upon request, the Forest Service may be obligated to disclose such records. However, documents or portions of documents will be protected if they satisfy the requirements of one or more FOIA exemptions.

If the Forest Service receives a FOIA request seeking information provided by your organization, [Executive Order 12600](#) requires the Forest Service to consult with you regarding the potential release of this information. When assembling your proposal package, you may wish to highlight any information that constitutes a trade secret, proprietary information, confidential data, or other information that would cause you competitive harm, impact personal privacy, or have other undesirable consequences if released to the public. For more information about the FOIA and its exemptions, please consult the Department of Justice Guide to the Freedom of Information Act (<https://www.justice.gov/oip/doj-guide-freedom-information-act-0>).”

**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.**

The application will not contain questions of a sensitive nature.

**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.**

Please see the provided Burden-Cost spreadsheet. Spreadsheet was populated using the following assumptions:

1. Number of respondents would be 24. This is based upon the typical number of respondents for the CWEWIP. This breaks down to 3 State applicants, 5 Tribal applicants, and 16 Public applicants.
2. Cost per hour value for respondent cost is \$40.90. This is based upon Employer Costs for Employee Compensation March 2022 report from the US Department of Labor Bureau of Labor Statistics. Accessed August 1, 2022  
<https://www.bls.gov/news.release/pdf/eccec.pdf>.

Burden Hour s for Public Applicants

Title of Collection: Burden Hours for FS-1500-0051: Community Wood Funding Opportunity Application

Estimate of Annual Burden: 48.00 hours.

Type of Respondents: Public applicants.

Estimated Annual Number of Respondents: 16.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 3.00 hours.

Title of Collection: Burden Hours for Screenshot of active or in-process SAM.gov registration.

Estimate of Annual Burden: 4.00 hours.

Type of Respondents: Public applicants.

Estimated Annual Number of Respondents: 16.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 1 hours.

TOTAL ANNUAL BURDEN FOR FS-1500-51 AND SCREENSHOT OF SAME IS 64 HOURS

Request for Common Use Forms:

Title of Collection: Burden Hours for FS-1500-35: Certificate Regarding Lobbying Activities

Estimate of Annual Burden: 4.00 hours.

Type of Respondents: Public applicants.

Estimated Annual Number of Respondents: 16.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 0.25 hours.

Title of Collection: Burden Hours for FS-1500-22: Financial Capability Questionnaire

Estimate of Annual Burden: 4.00 hours.

Type of Respondents: Public applicants.

Estimated Annual Number of Respondents: 16.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 0.25 hours.

Title of Collection: Burden Hours for FS-1500-23: Optional Project Performance Report

Estimate of Annual Burden: 48.00 hours.

Type of Respondents: Public applicants.

Estimated Annual Number of Respondents: 16.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 3.00 hours.

Burden Hours for Tribal and State Applicants

Title of Collection: Burden Hours for FS-1500-0051: Community Wood Funding Opportunity Application

Estimate of Annual Burden: 9.00 hours.

Type of Respondents: State applicants.

Estimated Annual Number of Respondents: 8.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 3.00 hours.

Title of Collection: Burden Hours for Screenshot of active or in-process SAM.gov registration.

Estimate of Annual Burden: 0.75 hours.

Type of Respondents: State applicants.

Estimated Annual Number of Respondents: 8.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 1 hours.

Title of Collection: Burden Hours for FS-1500-35: Certificate Regarding Lobbying Activities

Estimate of Annual Burden: 0.75 hours.

Type of Respondents: State applicants.

Estimated Annual Number of Respondents: 8.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 0.25 hours.

Title of Collection: Burden Hours for FS-1500-22: Financial Capability Questionnaire

Estimate of Annual Burden: 0.75 hours.

Type of Respondents: State applicants.

Estimated Annual Number of Respondents: 8.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 0.25 hours.

Title of Collection: Burden Hours for FS-1500-23: Optional Project Performance Report

Estimate of Annual Burden: 9.00 hours.

Type of Respondents: State applicants.

Estimated Annual Number of Respondents: 8.

Estimated Annual Number of Responses per Respondent: 1.

Estimated Total Annual Burden on Respondents: 3.00 hours.

TOTAL ANNUAL BURDEN FOR REQUEST FOR COMMON USE FORMS IS 144 HOURS

- 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). 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 costs incurred.

- 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.**

GS 13 – 200 hours to manage application process and reviewers

GS 13 – 100 hours national to support applications and questions

GS 13 – 200 hours of executing agreements

GS 15 – 60 hours grant direction and management

Based on the following rates to include salary and benefits

GS15 @ 88.50/hr

GS13 @ 63.63/hr

Total estimated of annualized cost to the federal government is \$37,125.00

- 15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

The initial submission erroneously included common forms as an administrative error. The common forms were removed from the renewal. Annual cost burden was also an administrative data entry error and was removed. No annual cost is included.

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

The information will be shared inside the USDA. Locations of the funded projects, funding award, and an abstract of the project will be shared with the public by two public facing USDA interactive project maps: [USDA Energy Investment Map](#) and the [Wood Innovations Project Data Map](#).

- 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.**

We are not seeking non-display approval and will display the expiration date for OMB approval.

- 18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

There are no exceptions.