

# **The 2023 Supporting Statement for OMB 0596-0253**

## **Forest Service Community Wildfire Defense Grant (CWDG) Program**

### **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, in cooperation with the States, is delivering the Community Wildfire Defense Grant (CWDG) Program as part of the Bipartisan Infrastructure Law. Title VIII of IIJA outlines the CWDG Program. The Agency is tasked with designing and implementing this Program that will award grants to at-risk communities, including Indian Tribes. According to 2 CFR Part 200 and Forest Service Handbook 1590.11, Chapter 20, there is certain narrative and budget information required for the Agency to determine if the project meets the legislative requirements and if the costs are reasonable, allocable, allowable, and necessary for the project.

- 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.**

Data collection procedures for the information on the CWDG Project Narrative Form (FS-1500-0045), SF-424 Application for Federal Assistance, and SF-424a BUDGET INFORMATION - Non-Construction Programs will be electronic through Grants.gov for public applicants. For those applicants that cannot submit the information electronically, please request a paper version of this CWDG Project Narrative Form (FS-1500-0045) by calling 208-559-0500 or sending a written request to USDA, Forest Service, Attention Timothy Melchert, Washington Office Fire and Aviation Management (FAM), 1400 Independence Avenue Southwest, Mailstop 1107, Washington, DC 20250.

Data collection procedures for the information on the CWDG Project Narrative Form (FS-1500-0045), Application for Federal Assistance 424 (FS-1500-0046), and BUDGET INFORMATION - Non-Construction Programs 424a (FS-1500-0047) will be electronic through forestrygrants.org for public applicants. For those applicants that cannot submit the information electronically, please request a paper version of the CWDG Project Narrative Form (FS-1500-0045), Application for Federal Assistance 424 (FS-1500-0046), and BUDGET INFORMATION - Non-Construction Programs 424a (FS-1500-0047) by calling 208-559-0500 or sending a written request to USDA, Forest Service, Attention Timothy Melchert, Washington Office Fire and Aviation Management (FAM), 1400 Independence Avenue Southwest, Mailstop 1107, Washington, DC 20250.

- 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.)**

Information collected includes name of organization, type of land work where will be performed, how project addresses State Forest Action Plan and the Cohesive Wildland Fire Management Strategy, if the community is considered underserved, amount of Federal funds requested and any non-Federal matching funds, name of lead agency/organization (if any), grant period, project narrative, project budget, project outcomes, how project will be maintained, and other miscellaneous information.

- 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.**

This information is collected from any entity who voluntarily applies for Forest Service funding and wishes to participate in the program.

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

This information is used by the Forest Service to determine which projects will be funded by the Community Wildfire Defense Grant Program.

**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?**

<b>Information Collected</b>	<b>Description</b>	<b>Information Provided to</b>	<b>Prepared by</b>
Individual	CWDG Program Project Narrative Form (FS-1500-0045)	Forest Service	Public
Individual	CWDG Program Project Narrative Form (FS-1500-0045)	Forest Service	Tribal
Individual	CWDG Program Project Narrative Form (FS-1500-0045)	Forest Service	Federal Government

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

Information is collected from applicants one time each fiscal year.

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

This information is used by the Forest Service and state forestry personnel who will be evaluating applications for funding. All applicant entity information collected is publicly available in [www.sam.gov](http://www.sam.gov). All information on the FS-1500-0045 will be available to the public, upon request.

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

The collection requirements are not expected to change over time.

**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.**

Data collection procedures for the information on the CWDG Project Narrative Form (FS-1500-0045) will be electronic through [Grants.gov](http://Grants.gov) and [ForestryGrants.org](http://ForestryGrants.org). For those applicants that cannot submit the information electronically in [Grants.gov](http://Grants.gov) and [ForestryGrants.org](http://ForestryGrants.org), please request a paper version of this CWDG Project Narrative Form (FS-1500-0045) by calling 208-559-0500 or sending a written request to USDA, Forest Service, Attention Timothy Melchert, Washington Office Fire and Aviation

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

The CWDG Program is authorized in Public Law 117-58 Infrastructure Investment and Jobs Act, commonly referred to as the Bipartisan Infrastructure Law (BIL), which was signed by the President on November 15, 2021. We will be holding an After Action Review of this process in January 2023 to determine if the information being collected is duplicated by any other source.

**5. 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.**

The CWDG prioritizes underserved communities and “for profit” entities are not eligible to apply for the Community Wildfire Defense Grant Program. The collection of information may affect 1-2 % of small entities. The required information has been kept to a minimum on the CWDG Project Narrative Form (FS-1500-0045) to facilitate applications from small entities. The Forest Service has established an Office of Grants & Agreements Access Storefront whose purpose is to ensure we identify/reach underserved communities and assist them through the application process if requested.

**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.**

If the Forest Service were not able to collect this information or frequency of collection is reduced, at-risk communities would not be able to obtain the Federal resources authorized by the Community Wildfire Defense Grant Program, the fuels reduction work would either be delayed or not accomplished, and the communities would continue to be at risk from wildland fire.

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

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure**

**and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would require this.

- 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 (FRN) was published on July 29, 2022 (Federal Register, Vol. 87, No. 145, Pages 45739-45744). Forest Service received three comment(s) from the public in response to this FRN. Below are the comments and responses:

**Comment 1:**

I was hoping you could confirm for me the application materials required for submission to the Community Wildfire Defense Grant. On pages 4-5 of the attached solicitation, it appears

that the following application materials have been listed:

- Project narrative form
- SF 424
- SF 424A
- Annual performance report
- System for award management screenshot
- Davis-Bacon Act written assurance
- Audit requirements

Are these the application materials required for submission? Are there any other application materials needed?

**Response 1:**

Thank you for your inquiry.

There will be a series of webinars August 4th, 8th and 9th to provide potential applicants with an overview of the grant program and more specifics on how to apply.

Here is the link to register, and the attached document should walk you through the registration process: [Community Wildfire Defense Grant Program Applicant Webinars](#)

Upcoming Webinars for Applicants

- Northeast-Midwest States: August 4, 2022 at 10:00 a.m. (Eastern Time)
- Western States and Territories: August 8, 2022, at 2:00 p.m. (Eastern Time)
- Southern States: August 9, 2022, at 10:00 a.m. (Eastern Time)
- Tribes: August 9, 2022, at 2:00 p.m. (Eastern Time)

Please share this information with anyone you feel may be interested in these CWDG Applicant Webinars.

Information about the CWDG Program can be found on the following website:  
<https://www.fs.usda.gov/managing-land/fire/grants>

**Comment 2:**

I hope this email finds you well. I am inquiring today about the “Community Wildfire Defense Grant Program”. Are FFRDCs/National Laboratories eligible to participate as a subrecipient?

**Response 2:**

Entities eligible to apply for funding under the Community Wildfire Defense Grant (CWDG) Program include:

- Units of local governments representing communities located in an area with a risk of wildfires
- Indian Tribes
- Alaska Native Corporations
- Non-profit organizations including homeowner associations that assist such communities
- State forestry agencies (including U.S. territories and interests)
- For-profit entities are not eligible to apply for CWDG.

Attached is the slide show from a training program we provided for applicants, that you may find useful.

**Comment 3:**

Good morning,

I am writing to you as we are interested in applying for the Community Wildfire Defense Grant. We have a project outlined in our CWPP and are in a High Risk wildfire area as defined by the USFS.

Can you give me the next steps to take?

**Response 3:**

Thank you for your inquiry.

There will be a webinar on August 8th to provide potential applicants in Western States with an overview of the Community Wildfire Defense Grant program.

Here is the link to register, and the attached document should walk you through the registration process: [Community Wildfire Defense Grant Program Applicant Webinars](#)

If you have questions after the webinar, feel free to contact me. The webinar will be recorded.

Information about the CWDG Program can be found on the following website:  
<https://www.fs.usda.gov/managing-land/fire/grants>

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Please share this info with anyone you feel may be interested in these CWDG Applicant Webinars.

**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.**

Following Forest Service reviewing submissions for the first application period several different After Action Review (AAR) sessions were conducted. The first was conducted during the National Association of State Foresters 2023 Chiefs, Managers, Supervisors Meeting on January 11, 2023. This session included many State program managers that support the CWDG, in part to obtain views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported. Additional Listening Sessions were held for applicants in January 2023 (one each for Northeast-Midwest states, Western States and Territories, Southern States and Tribes) and one for Forest Service staff. Following review of information gained during AAR and Listening Sessions strategic options were presented to the CWDG Workgroup to improve the application, review and scoring process during future rounds of the CWDG program.

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

The Forest Service will consult with representatives of those from whom information is to be obtained or those who must compile records upon completion of the third year of the CWDG Program, which was authorized on November 15, 2021.

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

No payment or gift is provided to respondents.

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

There is no assurance of confidentiality provided to respondents.

**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.**

This information collection does not ask 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.**

- 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. Record keeping burden should be addressed separately and should include columns for: a) Description of record keeping activity; b) Number of record keepers; c) Annual hours per record keeper; and d) Total annual record keeping hours.**

For this submission there are 1,440 respondents for 9,870 burden hours. See separate spreadsheet for breakout of burden and cost under supplementary documents. Records of successful applicants must be retained for a minimum of 3 years with this information collection.

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

**Table 1.**

<b>Form</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Hours per Response</b>	<b>Total Hours</b>	<b>Cost Per Hour</b>	<b>Total Cost</b>
FS-1500-0045 - Public	500	1.00	500.00	1.250	25.58	\$15,987.50
FS-1500-0045 - Tribal	100	1.00	100.00	1.250	25.58	\$3,197.50
SAM Screenshot - Public	400	1.00	400.00	1.000	20.91	\$8,364.00
SAM Screenshot - Tribal	80	1.00	80.00	1.000	20.91	\$1,672.80
Audit Requirements - Public	300	1.00	300.00	24.000	44.10	\$317,520.00
Audit Requirements - Tribal	60	1.00	60.00	24.000	44.10	\$63,504.00
<b>Total</b>			<b>1,440.00</b>			<b>\$410,245.80</b>

- 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 start-up/capital or operation/maintenance costs associated with this collection.

- 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.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- Employee labor and materials for developing, printing, storing forms
- Employee labor and materials for developing computer systems, screens, or reports to support the collection
- Employee travel costs
- Cost of contractor services or other reimbursements to individuals or



**organizations assisting in the collection of information**

- **Employee labor and materials for collecting the information**
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

**Table 2. Estimated cost to Government**

(a)	(b)	(c)	(d)	(e)	(f)
Description of the Collection Activity	Forms Processing Time per Applicant	Estimated Average Income per Hour of Processor	Total Estimated Cost per Application (b) x (c)	Applications per year	Total (d) x (e)
FS-1500-0045 - Federal Gov't Cooperative Fire	15 minutes	GS-13/5			
Totals	0.25	\$44.10	\$11.03	600	\$6,618.00

Total estimated annualized cost to the Federal government: \$6,618.00.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This renewal submission reflects an increase of 600 estimated applications, with burden increasing to 15 min per form.

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

We are not planning to publish the results/information collected.

**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.**

OMB approval number and expiration date will be displayed on all Information Collection instruments.

**18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act." There are no exceptions.**