

USDA, Forest Service
Paperwork Reduction Act (PRA)/Information Collection Request (ICR)
Justification for a Nonmaterial/Non-substantive Change Request Formally OMB 83c

OMB Control 0596-0253: Community Wildfire Defense Grant Program Project Narrative Form

The USDA Forest Service is requesting a nonmaterial/non-substantive change for information collection 0596-0253: Community Wildfire Defense Grant Program Project Narrative Form. This request is for approval of several non-material/non-substantive changes to the application form used by applicants to the Community Wildfire Defense Grant (CWDG) program. No changes to the burden hour estimates are necessary as the changes are to provide clarification and improve phrasing of questions that are already included within the current Project Narrative Form.

These proposed edits were developed based upon formal After Action Reviews that have been conducted after each of the three previous CWDG application periods. Additionally, the Forest Service solicited an independent analysis of the CWDG application questions and responses by the nonprofit research group Headwaters Economics. Their analysis resulted in recommendations for improving the phrasing of questions and directions in the Project Narrative Form. Lastly, the January 20, 2025, Executive Order entitled “Ending Radical And Wasteful Government DEI Programs And Preferencing” necessitated several updates to the Project Narrative Form.

The CWDG program was authorized in the Infrastructure, Investment and Jobs Act, and it is imperative that what will be the last application period of the CWDG program is able to be released prior to lapse of funding availability. Should these proposed edits to the Project Narrative Form require full Paperwork Reduction Act Clearance Process, the time involved may prevent the Forest Service from holding the last application period before an expiration of appropriated funding.

The requested edits include the following:

- **Grant Component Type** (Page 1)
 - Updates the naming of grant component type to “Implementation Project” rather than just “Project”.
 - This de minimis change is made for consistency and clarity.
- **GIS Coordinates** (Page 2)
 - Adds additional clarity by formally requesting “*including reference to state and county in the description.*”
 - This change does not introduce any new concepts or measures but will improve responses by applicants and will aid in ensuring sufficient geo-location information is provided by applicants. No change in expected response from applicants.
- **Project Description** (Page 3)
 - Deletes language referencing “benefits to traditionally underserved or marginalized audiences” to ensure compliance with the Executive Order “Ending

USDA, Forest Service
Paperwork Reduction Act (PRA)/Information Collection Request (ICR)
Justification for a Nonmaterial/Non-substantive Change Request Formally OMB 83c

OMB Control 0596-0253: Community Wildfire Defense Grant Program Project Narrative Form

Radical And Wasteful Government DEI Programs And Preferencing” issued on January 20, 2025.

- **Applicant Budget Table** (Page 4)
 - This change removes a response option by deleting this budget table entirely.
 - CWDG applications will now be submitted directly through grants.gov and since applicants will be required to submit an SF-424 and SF-424a as part of the application package this table would be redundant.
- **Project Budget Explanation** (Page 4)
 - This change updates the phrasing of the question to directly match what has been included in the Notice of Funding Opportunity.
 - This is a non-substantive change because no different information is being requested and there has always been a required Project Budget Explanation. The improved phrasing will result in more complete and accurate responses to the question.
- **Measurable Outcomes** (Page 5)
 - This change deletes response items for “Actual” outcomes from the Measurable Outcomes table.
 - These responses are not needed and therefore this simplifies the application and eliminates responses requested by applicants.
- **Accomplishments** (Page 6)
 - Non-substantive change to align the language with the Notice of Funding Opportunity.
 - This does not introduce any new concepts or measures that have not been previously subject to notice and public comment. This improved phrasing will result in more complete and accurate responses.
- **Collaboration** (Page 7)
 - This simply changes the language in order to align with current Notice of Funding Opportunity phrasing.
 - This does not introduce any new concepts or measures that have not been previously subject to notice and public comment. This updated phrasing will result in more complete and accurate responses.
- **Landscape Impacts** (Page 8)
 - This language change ensures proper alignment with current Notice of Funding Opportunity language.
 - No additional concepts or measures are introduced and will provide clearer direction for applicants to discuss landscape impacts of the CWDG project.
- **Project Sustainability** (Page 9)
 - Minimal change to provide clearer expectations for describing sustainability.

USDA, Forest Service
Paperwork Reduction Act (PRA)/Information Collection Request (ICR)
Justification for a Nonmaterial/Non-substantive Change Request Formally OMB 83c

OMB Control 0596-0253: Community Wildfire Defense Grant Program Project Narrative Form

- o This does not introduce any new concepts or measures that have not been previously subject to notice and public comment but will result in more complete and accurate responses.
- **Has this community been impacted by a severe disaster** (Page 9)
 - o Includes language confirming “severe disaster” described should utilize that concept as it is defined within the Notice of Funding Opportunity.
 - o This explanatory detail will also result in more complete and accurate responses.
- **Link to verification source – explanation as part of text box** (Page 9)
 - o Expansion of the text box to ensure the applicant adequately explains how Severe Disaster impacts wildfire risk or hazard been part of every Notice of Funding Opportunity. Severe Disaster is one of the legislative priorities and does not introduce new concepts or measures.
 - o Ensuring applicants explain how a Severe Disaster impacts future wildfire risk or hazard is central to meeting the legislative intent and will result in more accurate responses.

The requested changes may lessen the burden by eliminating some requested information. Most of the changes simply provide improved clarity about responses and there are no new concepts or measures introduced.

Included within this draft revised Community Wildfire Defense Grant Project Narrative Form is a “track changes” document to clearly illustrate proposed changes and the previously OMB approved FS-1500-0045 (OMB No: 0596-0253).