

2025 SUPPORTING STATEMENT
NEW INFORMATION COLLECTION
Rural eConnectivity Program – Broadband Technical Assistance
RURAL UTILITIES SERVICE
OMB NO.: 0572-NEW

Justification for Request of a New Collection

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

The Rural eConnectivity Program (ReConnect) was authorized under [7 U.S.C. 901](#) *et seq.*, and Pub. L. 115-141, §779. The Funding Opportunity will use technical assistance funds appropriated under the Infrastructure Investment and Jobs Act (IIJA) ([Pub. L. 117-58](#)). Applications received under the funding opportunity will be administered by the Rural Utilities Service (RUS or the Agency), a Rural Development (RD) agency of the United States Department of Agriculture. The assistance instrument for this program will be through cooperative agreements which RD is authorized to administer pursuant to 7 U.S.C. 2204b(b) (4).

This funding opportunity provides competitive cooperative agreement funding to eligible entities to ensure technical assistance and training is delivered to rural communities in need of high-speed internet and rural broadband providers. Program funds must be used to support broadband technical assistance activities which include, but are not limited to, project planning and community engagement, operations support, financial sustainability, environmental compliance, engineering, accessing federal resources, and data collection and reporting. The goal of the program is to support the expansion of high-speed internet into unserved rural communities.

Applications submitted for consideration will be reviewed for eligibility and completeness. Applications determined to be eligible will be evaluated according to the scoring criteria outlined in the funding opportunity. The scoring criterion is targeted to applicants that demonstrate strong work plans, organizational capacity, clear performance metrics, and the ability to reach the most rural communities. Points are also available for projects benefitting targeted groups such as Tribes and Tribal Entities, colonias, persistent poverty counties, and distressed energy communities.

Failure to collect proper information from applicants could hinder the government's selection of funding recipients, and result in improper determinations of assistance, increase legal costs to the recipients as well as encumber customer service and, ultimately, slow the deployment of assistance to rural areas in need of high-speed internet. The timing of technical assistance is critical due to the historic levels of broadband funding made available under the IIJA. The programs created and funded under the IIJA are beginning to disburse funding and technical assistance is critical to ensure unserved rural communities are able to participate in these programs, successfully implement projects and properly manage funds.

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.

The Agency provides forms and/or guidelines to assist in collection and submission of the information required. In some cases, use of Agency forms is optional and the applicant may submit the information required on other forms. The Agency will utilize standard and existing RD forms to the greatest extent possible to continue to meet the needs of the program. The forms or related items completed by the applicant are submitted to and evaluated by the Agency. Failure to collect proper information from applicants could result in improper determinations of assistance, hinder the government's recovery of such loans as well as encumber customer service.

REPORTING REQUIREMENTS FOR THIS COLLECTION – Written/Non Forms

A. Application Phase

SAM Registration and General Certifications and Representation. To do business with the Federal government, the applicant is required to obtain a Unique Identification Number and register in the System for Award Management (SAM). Registration in SAM allows the applicant to complete the Online Representations and Certifications which replaces several paper forms. Registration in SAM is also required in order to submit applications into www.grants.gov and the registration must be updated annually.

Written Narrative Proposal. Applicants are required to submit a detailed written narrative that is limited to 25 pages. The narrative must clearly identify the funding category they have chosen. The narrative must also address each evaluation criteria in the order they are presented in the funding opportunity. The evaluation criteria to be addressed are as follows:

1. Project Work Plan - The applicant must provide a detailed project work plan that demonstrates the soundness of the proposed broadband technical assistance approach. The work plan must consist of the work plan approach, work plan implementation plan, and a detailed budget that is accompanied by a budget justification.

2. Organizational Capacity - All applicants must demonstrate the capacity to deliver and/or support broadband technical assistance activities. The applicant's proposal should demonstrate that the applicant has identified appropriate key personnel, both in terms of number of personnel and qualifications of personnel and should provide specific detail of qualifications of key personnel relating to broadband technical assistance. Capacity of personnel to access data for needs assessments and access to planners and other technical experts will be evaluated.

3. Targeted Communities – The applicant must describe how the technical assistance will benefit targeted communities and how the project will promote the expansion of broadband within the target area(s) the project may impact. Points will be awarded if at least 50 percent of

the rural communities benefiting from the project consist of Tribes and Tribal Entities, Colonias, Persistent Poverty Counties, and Distressed Energy Communities.

4. Rurality - Applicants must provide the population and/or population density of the rural communities to be served.

5. Economic Need - Applicants must provide the county poverty percentages of the communities proposed to be served in the application. The percentages must be determined by utilizing the United States Census Small Area Income and Poverty Estimates (SAIPE) Program. Communities located in geographic areas, for which no SAIPE data exist, will be determined to have an average SAIPE poverty percentage of 30 percent.

6. Performance Measures - The applicant's proposal should include a description for how the results of the technical assistance will be measured, including the indicators and benchmarks to be used for measuring effectiveness. Performance measures should align with the goal of the program which is to expand broadband access into rural areas.

Tribal Certification. This certification, from the appropriate Tribal official, is required if a project is being proposed over or on Tribal Lands and the applicant is not the Tribe nor a Tribal Entity owned by the Tribe. This requirement is necessary to ensure the Agency does not inadvertently fund projects that the Tribe is not in support of over or on their lands.

B. Post Award, Servicing and Reporting

Agreement (Legal Document). Selected applicants will receive an award letter that will include an agreement that contains all the terms and conditions for the cooperative agreement. Applicants must execute and return the legally binding agreement between the Awardee and Agency plus any additional items required by the agreement.

Risk Review and Additional Information. The Agency may request additional documentation from selected applicants to evaluate the financial, management, and performance risk posed by awardees as required by 2 CFR 200.205. Applicants may also be asked to provide clarification or additional documentation on their application materials submitted.

Environmental-Categorical Exclusion Confirmation. Applicants are subject to the requirements outlined in 7 CFR 1b. However, awards for technical assistance and training under this notice are classified as a Categorical Exclusion and usually do not require any additional documentation. RUS will review each application to determine its compliance with 7 CFR part 1b. The applicant may be asked to provide additional information or documentation to assist RUS with this determination.

Annual Performance Reporting. All recipients of financial assistance must provide annual performance activity reports to RUS until the project is complete, and the funds are expended. These reports should include: (i) a comparison of actual accomplishments to the objectives established for the period, (ii) A description of any problems, delays, or adverse conditions which have occurred, or are anticipated, and which may affect the attainment of overall project

objectives, prevent the meeting of time schedules or objectives, or preclude the attainment of particular project work elements during established time periods. This disclosure shall be accompanied by a statement of the action taken or planned to resolve the situation; and (iii) Objectives and timetable established for the next reporting period.

Final Project Performance Report. A final performance report is also required; the final report may serve as the last annual report. The final report must include an evaluation of the success of the project in meeting the program objectives.

Annual Audit. All recipients of financial assistance must provide an annual audit if required to do so by 2 CFR part 200, subpart F (Audit Requirements).

SAM Registration Maintenance. Each applicant (unless an exception, as outlined in 2 CFR 25.110(a) through (d), is approved by the Agency) is required to maintain an active SAM registration with current information at all times during which it has an active Federal award. The Agency uses the SAM site to ensure continued eligibility to receive Federal financial assistance.

REPORTING REQUIREMENTS – FORMS APPROVED UNDER OTHER OMB CONTROL NUMBERS

Form RD 400-4, “Assurance Agreement” (Approved under 0575-0201).

The form is completed by the applicant and used to confirm that recipients of Rural Development loan and grant assistance have been reminded of their obligation to comply with all provisions of the Civil Rights Act of 1964 and regulations of Rural Development.

SF-424, “Application for Federal Assistance” (Approved under 4040-0004). Completed once, by the applicant, at the time of application. The form is required to collect necessary information on the applicant.

SF-424B, “Assurances—Non-Construction Programs” (Approved under 4040-0007). The form is completed and submitted by applicants to provide assurances to comply with the laws, regulations and policies to which the grant is subjected. This form is submitted as part of the pre-application and if the project is selected as part of the formal application.

SF-270, “Request for Advance or Reimbursement” (Approved under 4040-0012). This form is used to request funds for all grant programs when letters of credit or predetermined advance methods are not used. The Federal awarding agencies and OMB use information reported on this form for general management of the Federal assistance awards programs.

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.

RD is committed to complying with the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. Applications must be submitted electronically using [Grants.gov](https://www.grants.gov), and as such, all reporting requirements noted above, both written/non forms and forms approved under other OMB control numbers, are submitted electronically at [Grants.gov](https://www.grants.gov). To apply electronically, applicants must follow the instructions for this funding announcement at [Grants.gov](https://www.grants.gov). Applicants can locate the [Grants.gov](https://www.grants.gov) downloadable application package for this program by using a keyword, the program name, or the Assistance Listing Number for this program.

4. Describe efforts to identify duplication.

There is no duplication of information requested. If applicants are applying for other programs where similar information is required, the Agency would make every effort to use that information which is the same.

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

The information collected is unique to each applicant and is the minimum necessary to administer the technical assistance program and is collected in a format designed to minimize the paperwork burden on small businesses and other small entities.

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.

The information collected under this program is the minimum necessary to conform to the requirements of the program. Information is collected when needed or required by departmental regulations. Information cannot be collected less frequently and meet the requirements of the programs. Failure to collect proper information could result in improper determinations of eligibility or improper use of funds.

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

- a. Requiring written responses in less than 30 days.

This collection does not require a response in less than 30 days.

- b. Requiring more than an original and two copies.

The Agency does not request more than an original and two copies of any document.

- c. Requiring respondents to retain records for more than 3 years.

Unless otherwise noted by statute, the Agency does not require applicants to retain records for more than 3 years beyond the designated action's effective date.

- d. Not utilizing statistical sampling.

This collection does not involve statistical information.

- e. Requiring use of statistical sampling which has not been reviewed and approved by OMB.

This collection does not involve statistical sampling.

- f. Requiring a pledge of confidentiality.

This collection does not require a pledge of confidentiality.

- g. Requiring submission of proprietary trade secrets.

This collection does not require submission of proprietary trade secrets.

8. Describe efforts to consult with persons outside the Agency to obtain their views on 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.

In accordance with 5 CFR 1320.8(d), a 60-day notice for public comment was published in the Federal Register on February 18, 2026, at 91 FR 7429. The Agency received one response from its posting of the notice for renewal. The respondent argues that OMB should not renew the information collection because the agency failed to meet various requirements. The respondent alleges that the burden estimate is unrealistic, not broken out by respondent type, and ignores Tribal documentation obligations. They also state items are missing from the Agency's submission. The Agency used data published by the U.S. Department of Labor when calculating burden requirements, which is required of the Agency, and the work needed to compile an application is nearly identical for all applicants regardless of entity type. This would lead to nearly identical time obligations for all applicants. Additionally, calculations noted in the Agency's posting were required to capture what is faced by the average applicant. The average applicant is not impacted by the need to have a letter of Tribal consent as they are either the Tribe themselves or are a non-Tribal entity not operating on Tribal lands meaning the time to obtain Tribal consent to operate on Tribal lands is not required. Also, applicants are not required to submit any financial or engineering/technical information as part of the application.

Lastly, the comment presented misrepresents the requirements for a 60-day notification as noted in the Paperwork Reduction Act. The Agency remains committed to continued discussions with stakeholders to ensure time burden is as minimal as possible for this program.

The Agency also consulted with applicants and received the following responses:

Director of Research, Merit Network: Annual financial reporting is appropriate, and the forms are straightforward enough to fill out. Changing all forms so that they may be signed electronically in Adobe would be an added benefit in the future. The reporting expectations for project activities were clear and manageable, including the monthly updates for the program officer and the annual reports for the full grant program. More detailed feedback on the yearly reports would have helped strengthen future submissions.

Deputy Chief Engagement Officer, University of Missouri: The collection of information is not overly burdensome but some of the application prompts lead to the sharing of duplicate information. Regarding serviceable location areas and the changing landscape of coverage, it can be a challenge to identify targeted areas for project delivery using required USDA maps that may not be up to date.

Cofounder & CEO, Bluebonnet Fiber: My grant writer, who holds over 20 years of experience, had indicated to me that the BTA program's application was one of her favorite applications to prepare, an experience that I and everyone involved with the application concurred with. The information required did not pose a significant burden, was consistent with industry norms and our expectations, and the application format encouraged us to provide as much detail as we felt was necessary to better respond to the NOFA. The application process was approachable and clear thanks to a concise but detailed NOFA, application guide, written Q&A opportunities, and a series of recorded and public webinars that accepted live Q&A.

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

There are no such payments or gifts.

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

No assurance of confidentiality is provided to respondents for the information required. When necessary, the Agency will process any and all requests for release of records and information in accordance with the Privacy Act of 1974. However, in some instances, the information collected under the provisions of this program is not considered to be of a confidential nature. For example, organizations, such as not-for-profit entities and public bodies from which information is collected, are ordinarily required to make their activities available for public scrutiny.

The Agency published a Privacy Act of 1974; System of Records in the Federal Register on May 14, 2019 (84 FR 21315). A copy of that document can be found at <https://www.govinfo.gov/content/pkg/FR-2019-05-14/pdf/2019-09874.pdf>.

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

There are no questions of a sensitive nature.

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

The following table summarizes the estimated average annual burden associated with the funding opportunity. For a detailed breakdown of the burden for the forms and activities, please see the attached spreadsheet.

Burden Item	Estimated Yearly Average Burden
Number of respondents:	95
Annual responses:	885
Hours per response	2.638
Total hours:	2,335
Cost per hour:	\$83.07
Total annual cost:	\$193,969

RD estimates that the primary individuals performing actions will be General and Operations Managers earning a total hourly wage of \$83.07. RD based this hourly wage rate on the mean hourly wage rate (Occupation Code 11-021) of \$64 according to the Bureau of Labor Statistics (“BLS”) May 2024 Occupational Employment and Wage Estimates (“OES”) at <https://www.bls.gov/oes/current/oes11021.htm>. Data provided by the Bureau of Labor Statistics, Employer Cost for Employee Compensation – September 2022 was utilized to calculate the total cost of benefits. Benefits as a percentage of total compensation for private industry workers in professional and business services industries were 29.8% of total hourly compensation (<https://www.bls.gov/news.release/pdf/eccec.pdf>) which equates to \$19.07.

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

(a) Total capital and start-up cost component (annualized over its expected useful life); and

There are no capital or start-up costs required pursuant to this FOA.

(b) Total operation and maintenance and purchase of services component.

There are no operation and maintenance and purchase of services required.

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

The annualized cost to the Federal Government is estimated to be \$158,450. This estimated cost assumes the 885 total annual responses received averaging 2 hours to review per response for a total of 1,770 hours. See below.

National Office staff will be responsible for all application processing and servicing actions. Costs were calculated based on the estimated amount of time the national office staff is expected to spend on each component of the program. Salary Table 2025-DCB of the general schedule for a GS-13, step 5 for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality area was used for wage calculation purposes. The cost of total benefits as a percentage of total hourly compensation for Federal Government employees has been calculated by multiplying 36.25 percent (\$23.82) by the hourly OPM wage (\$65.70) in accordance with OMB Memorandum M-08 13.

Activity	Total Review Hours	Salary	Total Cost
Application Review and Servicing:	1,770	89.52	\$158,450

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

This program experienced a significant increase in the number of respondents submitting applications since the previous report was submitted. This led to an increase in the number of review hours and total cost.

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

There are no plans for publication of 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.

The agency is not seeking such approval.

18. Collection of Information Employing Statistical Methods.

This collection does not involve a survey. Thus, this collection does not employ statistical methods.

19. Explain each exception to the certification statement identified in item 19 on OMB 83-1.

There are no exceptions requested to the certification statement involved with this collection request.