

SUPPORTING STATEMENT - PART A for

OMB Control Number: 0578-0032

Urban Agriculture and Innovative Production (UAIP) Grant Agreement

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**United States Department of Agriculture
National Resource Conservation Program
Supporting Statement
Urban Agriculture and Innovative Production (UAIP) Grants
OMB Control Number: 0578-0032**

1. 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.

NRCS is requesting a reinstatement with change of a previously approved collection for Urban Agriculture and Innovative Production (UAIP) Grant Agreement. Due to staffing and workload challenges resulting from the Deferred Resignation Program, the publication of the required Federal Register notice was delayed and the 60-day comment period ended past the expiration date.

The affected public is Private Sector – not-for-profit and farms, and State, Local or Tribal Government. 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 award competitive grants to local units of government, school districts, and tribal communities to support the development of urban agriculture and innovative production with the goal of improving access to local foods in areas where access to fresh, healthy food is limited or unavailable. 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.

The affected public is Private Sector – not-for-profit and farms, and State, Local or Tribal Government. 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 15% De Minimus Rate when calculating indirect costs. Estimated burden time: 0.25 hour per awardee requesting indirect costs who does not have a NICRA.

Notice of Award

NRCS requires all grants recipients to sign the Notice of Award. Estimated Burden Time: 0.5 hour per awardee. This form is generated when the agreement is produced on the EzFedGrant System.

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, exp. 03/31/2029
SF-424A, Budget Information Non-Construction	4040-0006, exp. 06/30/2028
SF-425, Financial Status Report	4040-0014, exp. 06/30/2028
SF-270, Request for Advance and Reimbursement	4040-0012, exp. 06/30/2028
Certificate Regarding Lobbying	4040-0013, exp. 06/30/2028
SF-LLL, Disclosure of Lobbying Activities	4040-0013, exp. 06/30/2028
<u>NRCS-OUAIP-1: OUAIP Annual Progress Reports</u>	0578-0033, exp. 03/31/2026, renewal under OMB review

3. Use of information technology and burden reduction. 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.

NRCS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. UAIP grants 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 UAIP activities' possession or providing written replies to agency requests or offers. Non-form collections, as well as all forms, may be submitted by email. The agency anticipates 100% of responses to be submitted electronically for each affected public.

4. Efforts to identify duplication. 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.

Every effort has been made to avoid duplication. There is similar data collected; however, those do not meet the agency's need. NRCS solely manages issuance for the UAIP grant agreement process to ensure integrity. The information required for data collection is not currently reported to any other agency on a regular basis in a standardized form. UAIP recipients provide information on a regular basis to NRCS to comply with reporting requirements.

5. Impacts on small businesses or other small entities. 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. Therefore, the estimate for small entities is 0 respondents.

6. Consequences of collecting the information less frequently. 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.

This collection is mandatory and is an on-going collection request. The regulation requires the minimum information needed to determine whether UAIP 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 UAIP in an efficient and cost-effective manner while ensuring sufficient program analysis.

7. Special circumstances relating to the Guidelines of 5 CFR 1320.5. 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. Comments to the Federal Register Notice and efforts for consultation. 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.**

Summary of Comments and Agency Response

NRCS published a 60-day Federal Register Notice on **January 21, 2026 (91 FR 2519)** announcing the proposed revisions to the UAIP information collection. Five public comments were received. Commenters broadly supported the revisions, noting anticipated improvements in administrative efficiency, reduced burden through standardized reporting formats, and clearer data categories. Several commenters emphasized that structured fields and aligned reporting cycles would enhance data quality, comparability, and program evaluation. One commenter highlighted the need for increased outreach to underserved regions, specifically requesting stronger awareness efforts in southern States and noting challenges faced by small urban agriculture organizations in accessing program information. Recommendations included expanded communication strategies and additional support for organizations with limited administrative capacity. A recurring concern involved the administrative pressure faced by smaller organizations with limited staff, with recommendations to keep reporting requirements simple and provide clear instructions or templates.

No comments were received specifically regarding **estimated costs or hour burden.**

How NRCS Addressed These Comments

NRCS acknowledged the supportive feedback and the suggestions for ensuring clarity and accessibility. In response:

- NRCS will continue refining written guidance, templates, and instructions to ensure grantees understand expectations and can use structured forms consistently.
- NRCS is committed to monitoring grantees and awardees to identify further opportunities for improvement in the information collection process.
- NRCS will maintain close communication with grantees, providing ongoing technical assistance, clarification, and advice as issues arise.
- Feedback related to minimizing burden on smaller organizations will be considered in future updates to instructions and training materials.
- Comments regarding outreach needs will be shared with relevant program offices so that they may consider additional communication efforts, including strengthened engagement with underserved regions

These steps help ensure the revised information collection is efficient, standardized, and responsive to user needs while maintaining program accountability.

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 recipients are current UAIP 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.

- Rural South Institute, rsi@ruralsouthinstitute.com, 202-604-3536
- A Red Circle, tony@aredcircle.org, 314-619-1453
- Northeast Organic Farming Association, admin@nofamass.org, 413-214-1237

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

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

10. Assurances of confidentiality provided to respondents. 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 UAIP grants 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.

The Acting Assistant Privacy Officer, Samantha Jones, reviewed and approved this package on February 11, 2026.

11. Justification for any questions of a sensitive nature. 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 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. While financial information is requested, it pertains strictly to the use and accountability of federal funds. Such financial reporting is standard in federal grant and award management and is not considered sensitive or private under PRA guidelines. Instead, it is essential for ensuring transparency, proper stewardship of public resources, and compliance with federal regulations.

12. Estimates of the hour burden of the collection of information. 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.

A. 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.

The estimate total respondents is 100 for Private Sector – not-for-profit and farms, and State, Local or Tribal Government 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
80 Not-for-Profit and Farms	
14 Local Government	
6 Tribal Government	
Estimated Number of Responses per Respondents	13
Estimated Total Annual Responses	1,300
Estimated Time per Response	0.2307692 hours
Estimated Total Annual Burden Hours	300

There is no third-party disclosure burden associated with this information collection request.

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

Respondent cost per hour was derived by using U.S. Bureau of Labor Statistics Occupational Employment and Wages, June 2025 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 29.8 percent,¹ or \$13.92, resulting in a total of \$61.36 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 \$18,408 (300 hours x \$61.36).

13. Estimates of other total annual cost burden. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 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.

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

14. Provide estimates of annualized cost to the Federal government. 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 total annualized cost to the Federal Government is \$18,731.46 (\$66.66 x 281 responses).

The cost for the Federal Government is the NRCS employees that support UAIP obtaining and reporting the information that is submitted. Employees review the information provided to

¹ U.S. Bureau of Labor Statistics. “Employer Costs for Employee Compensation.” News release. June 2025. <https://www.bls.gov/news.release/ecec.htm>.

effectively administer federal grant funds according to applicable rates and regulations. It is estimated that employees spend 2 hours on information submitted from each UAIP applicant and an additional 2 hours on information submitted by each UAIP 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.

15. Explanation of program changes or adjustments. Explain the reasons for any program changes or adjustments reported.

The agency is seeking a reinstatement, with change, of a previously approved collection request. The current burden inventory is 897 estimated annual respondents; 897 estimated annual responses; and 6773 estimated annual burden hours. The reinstatement request is seeking 100 estimated annual respondents; 1,300 estimated annual responses; and 300 estimated annual burden hours. This reflects a decrease in the number of estimated respondents (-797), an estimated increase in annual responses (403), as well as a decrease in the estimated number of annual burden hours (-6473) 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.

Adjustments

- reduction in new agreements and funding opportunities.

16. Plans for tabulation, and publication and project time schedule. For collections of information whose results are planned to be published, outline plans for 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, and/or included in routine Congressional reports.

17. Displaying the OMB Approval Expiration Date. 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 doesn't have any standardized forms and will comply with the PRA if it chooses to create forms for OMB approval.

18. Exceptions to the certification statement identified. Explain each exception to the certification statement identified under Certification for Paperwork Reduction Act."

There are no exceptions requested.