

Supporting Statement for Paperwork Reduction Act Submissions

For OMB Control Number 0551-NEW

Title: USDA Food for Peace Program

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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.***

This is a new generic information collection request. Information collection is required by 2 CFR Parts 200 and 400. For assistance agreements awarded on or after December 26, 2014, 2 CFR Part 400 implements OMB regulations in 2 CFR Part 200. These regulations include only those provisions mandated by statute or added by USDA to ensure sound and effective financial assistance management. These regulations set forth pre-award, and post-award and requirements. This information is needed by FAS project officers, grant specialists, program coordinators, managers, and finance officials to manage/oversee recipient programmatic and financial performance under FAS assistance agreements. This is a generic information collection to cover all grant making under the Food for Peace program as noted in 7 U.S.C. §§ 1721, *et seq.*

This FAS generic collection package will allow and account for all of FAS' competitive and non-competitively awarded Food for Peace grants to collect information from grant applicants that are needed to evaluate and rank applicants and protect the integrity of the grantee selection process. To that end, the list of programs within Food for Peace include: the emergency programming, the non-emergency programming, the John Ogonowski and Doug Bereuter Farmer to Farmer program, and the International Food Relief program.

Each program includes a number of information collections as listed in questions 12 and 14. Some of the budgetary information (SF-424 series) and the lobbying certification (SF-LLL) forms are pre-approved by the Office of Management and Budget (OMB) and therefore, do not require separate approval. The SF-424 form family is approved by OMB (OMB Control Number 4040-0020, Expiration Date: March 31, 2029; however, reporting and recordkeeping burden hours associated with this form must be accounted for in each agency's information request packages.

FAS will note in any grant solicitation that applicants must use the uniform grant application package, and the information collection has already been approved by OMB. If FAS decides not to use this uniform grant application package or determines that it needs grant applicants to provide additional information not contained in this uniform package, then FAS will publish a 60- day and/ or a 30- day notice soliciting comments on its proposal to collect different or additional information before issuing the grant solicitation.

The publicly posted grant application package will include general information and instructions; requirements for the technical program narrative describing how the grant goals, objectives, and outcomes will be reached, as well as a description of the budget; the Standard Forms SF-424 series, and SF-LLL, which request basic information, budget information, and disclosure of lobbying activities certification, respectively. The proposed information collection covered in this request is related to the requirements for the technical program narrative, which is described in 2 CFR Part 200, Appendix I (as supplemented by 2 CFR Part 400) and will apply to all types of competitive and noncompetitive awards to the following grantees: public or private organizations, including intergovernmental organizations and other multilateral organizations.

- 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.***

Pre-award information is used by federal staff of FAS who serve on a panel to qualify and select assistance agreement applicants for funding. Post-award reporting is used by FAS personnel to conduct standard monitoring, to make amendments to established assistance agreement awards, to make payments pursuant to such awards, and to verify that the recipient is using Federal funds appropriately to comply with applicable Federal and agency requirements. The information is necessary to ensure minimum fiscal control and accountability for award funds and to deter waste, fraud, and abuse. The selection criteria will be contained in the grant announcement package. We anticipate this process will occur two to three times each fiscal year for each grant program. Post-award collection frequency varies by instrument and ranges from monthly to once during the grant life cycle.

The following [grants.gov](http://www.grants.gov/web/grants/forms.html) forms are required of grant applicants. They are located at <http://www.grants.gov/web/grants/forms.html>.

Non-Construction Grant Projects Forms: SF-424 Family:

1. Application and Instruction for Federal Assistance (SF-424), OMB Control Number 4040-0020, Expiration Date: March 31, 2029.
2. SF LLL (Disclosure of Lobbying Activities), OMB Control Number 4040-0013, Expiration Date: June 30, 2028, the form is used to indicate whether the applying organization intends to conduct lobbying activities. If the organization does not intend to lobby, they can respond, “**Not Applicable.**”
3. Certification Regarding Lobbying, OMB Control Number 4040-0013, Expiration Date: June 30, 2028.
4. SF-425, Federal Financial Report, OMB Control Number 4040-0014; Expiration Date: June 30, 2028.

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 (item 13b1 of OMB form 83-i).*

FAS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. Electronic submission is enabled and encouraged and the vast majority of information collected from respondents is submitted electronically through the Web-Based Chain Management System (WBSCM) or e-mail. The reliance on electronic data collection has resulted in a significant reduction in both the required paperwork and in the time it takes respondents to prepare and submit the information. This transition has provided external stakeholders with a one-stop and consistent entry point. The system also reduces agency time in reviewing applications, agreements, payments, and reporting.

The implementation of an electronic system – the Web-Based Supply Chain Management System – has significantly reduced the amount of hard copy documents FAS receives. Information collected at each point in the business cycle is retained and used by the systems at later points in the cycle. These collections are necessary to respond to recommendations for improvements in monitoring and evaluation and oversight. The electronic systems allow for efficient collection and analysis of results and compliance. All responses will be collected by email or through WBSCM.

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.*

There is no other source for the information sought. Applications are unique and program specific. There is no similar data collection effort available.

5. *Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.*

The information requested is the minimum amount required to meet program requirements. It cannot be reduced for small businesses or associated small entities. Although some grantees may be considered a small business or a small entity, they deliver the same program benefits and perform the same function as any other grantees. Thus, they maintain the same kinds of information on file. FAS estimates that 20 percent of respondents, including for-profit and non-profit organizations, are small businesses or 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.*

This is a voluntary, ongoing data collection, required to obtain and maintain grant funding. Without the data compiled, it would be impossible for FAS to manage any of its federal assistance programs and to assure program integrity and that public resources are properly used under the program. The agency seeks minimal information that will be critical in selecting the most promising grantees. This information collection is necessary to satisfy statutory requirements and to assure that public resources are properly used under food assistance programs. Rational, fair grant and cooperative agreement awards would be extremely difficult to make, and financial and technical managerial information would not be available for assessing the status of grant and cooperative agreement efforts. Decreasing the frequency of data collection would have similar negative impacts on the ability to implement the program.

Because FAS funds the procurement and transportation costs for agricultural commodities within this program, it is essential for participants to submit procurement and transportation-related documents. This ensures that transportation is procured in a fair manner and at the lowest cost possible to the federal government. Moreover, in cases of ocean transportation, ship owners/brokers are required to submit documents to ensure that all the contractual obligations have been met prior to payment. Likewise, submission of surveys is necessary to have a full accounting of the commodities shipped, including any losses or damages. Lessening any of these requirements could result in less accountability to the federal government in the freight procurement process.

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

- **requiring respondents to report information to the agency more 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 than can be generalized to the universe of the study;**
- **requiring the use of 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 for this information collection request.

8. *Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain them.*

FAS published a 60-day Notice of Proposed Information Collections for public comments in the Federal Register, Volume 91; Page 16631 on April 2, 2026. The public was given until June 1, 2026, to submit comments on the proposed information collection. No public comments were received and thus no effort was taken to take any comments into consideration.

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

This information collection activity involves no payments or gifts to respondents.

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

No pledge of confidentiality is given for applicant responses; however, as a practical matter, FAS does not release the content or any other details of non-selected applications collection unless its release is required under a Freedom of Information Act request.

The collection of this information is for the purpose of aiding in the review of applicants prior to grant award decisions and for management of grants post award. The only personally identifiable information that is requested from potential applicants is included on SF-424. This information may be used within FAS but will not be disclosed outside of the Agency. Grantees will be required to submit semi-annual financial status reports. These reports will be stored in a secured database.

Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice, FAS Privacy Officer. Various methods of computer security limit access to records in automated databases.

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

There are no questions of a sensitive nature associated with this information collection.

12. *Provide estimates of the hour burden of the collection of information. The statement should: * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Read the complete instructions on the form 83i.*

As a new program, the hour burden is estimated based on the burden hours for the same documents required of respondents to other programs. Estimates were obtained by using agency data, queries in the agency's grants management system, and historical information of consultation with respondents to similar food assistance programs. The precise burden will vary from year to year based on the number of applicants; the number of awards awarded that year; the number of awards awarded in previous years that remain active; the frequency with which recipients choose to submit claims; and the number of requests for extension, or other amendments submitted by recipients.

Average hourly cost is estimated at approximately \$50 for participants. This hourly cost is based was obtained from the U.S. Department of Labor, Bureau of Labor Statistics, May 2026 National Industry-Specific Occupational Employment and Wage Estimates (<https://www.bls.gov/oes/current/oesrci.htm>) for Civic and Social Organizations 813400, 13-1082 and others, which represents an average cost for respondents' program participation. This hourly cost used in this estimate includes fringe benefits. The total annual estimated burden in dollars is \$1,273,700.

There are 34 collection activities associated with this information collection and associated burden information is provided for each.

Information Collection	Number of Respondents	Average Number of Responses per Respondent	Total Annual Responses	Burden Hours/Minutes per Response	Total Annual Burden Hours	*Hourly Cost	Total Annual Cost
Concept Paper – Needs Assessment and Gap Analysis	40	6	240	8	1,920	\$50	\$96,000
Concept Paper – Technical Approach, Activities, and Oversight	40	6	240	20	4,800	\$50	\$240,000
Concept Paper – Budget Overview	40	6	240	4	960	\$50	\$48,000
Concept Paper – Commodity Table	40	6	240	8	1,920	\$50	\$96,000
Concept Paper – Map of Proposed Target Areas	40	6	240	4	960	\$50	\$48,000
Concept Paper – Past Performance	40	6	240	8	1920	\$50	\$96,000
SF-424 (4040-0004)	14	3	42	10	420	\$50	\$21,000
Full Application – Expanded Technical Narrative	14	3	42	40	1,680	\$50	\$84,000
Full Application – Organizational Capacity and Staffing Narrative	14	3	42	8	336	\$50	\$16,800
Full Application – Organization Chart	14	3	42	4	168	\$50	\$8,400
Full Application – In-Country Registration	14	3	42	4	168	\$50	\$8,400
Full Application – Most Recent Single Audit	14	3	42	21	882	\$50	\$44,100
Negotiated Indirect Cost Rate Agreement	14	3	42	1	42	\$50	\$2,100
Full Application – Sub-Recipient Information	14	3	42	8	336	\$50	\$16,800
Full Application – Indicator Table	14	3	42	4	168	\$50	\$8,400
Results Framework (2)	14	3	42	8	336	\$50	\$16,800

Monitoring and Evaluation Brief (3 pages)	14	3	42	12	504	\$50	\$25,200
Full Application – Commodity Table	14	3	42	4	168	\$50	\$8,400
Full Application – Commodity Management Plan	14	3	42	16	672	\$50	\$33,600
Full Application – Budget Summary	14	3	42	4	168	\$50	\$8,400
Full Application – Budget Narrative	14	3	42	40	1,680	\$50	\$84,000
Full Application – Detailed Budget	14	3	42	12	504	\$50	25,200
Grants.gov Lobbying Form	14	3	42	.5	21	\$50	\$1,050
SF-LLL	14	3	42	.5	21	\$50	\$1,050
Agreements Signed	14	3	42	16	672	\$50	\$ 33,600
Amendments Requested	14	3	42	4	168	\$50	\$8400
Amendments Signed	10	3	30	8	240	\$50	\$12,000
Performance Report	14	6	84	10	840	\$50	\$42,000
Financial Report	14	6	84	10	840	\$50	\$42,000
Risk Management Plan	14	3	42	16	672	\$50	\$33,600
Distribution Plan	14	3	42	4	168	\$50	\$8400
Evaluation Plan	14	3	42	16	672	\$50	\$33,600
SF-425 Financial Report (4040-0014)	14	6	84	1	84	\$50	\$4,200
SF-270 Request for Advance or Reimbursement (4040-0012)	14	6	84	1	84	\$50	\$4,200
Closeout Reports	14	1	14	20	280	\$50	\$14,000
Totals	40	69.65	2,786	9.14	25,474	1,750	1,273,700

*Note: There are forty (40) unique respondents (Business- Public or private organizations, intergovernmental organizations, or other multilateral organizations) and therefore not double counted.

13. Estimate of the annual cost to respondents or recordkeepers (do not include the cost of hour burden shown in Items 12 and 14). Read the complete instructions on the form 83i.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection. There is no additional cost to respondents or record keepers resulting from this information collection.

14. Estimate annualized costs to the Federal government.

The annual estimated cost to the Federal Government for this collection is \$417,720. Average hourly cost is estimated at \$60 per hour, based on the weighted average wage for FAS Program Managers ranging from GS 11-15 based on the 2026 General Pay Scale, which represents the range of staff reviewing information submissions and an assumption that GS-11/12/13 will have higher levels of effort. The hourly cost used in the estimate includes fringe benefits and assumes Step 5 for all staff.

Information Collection	Number of Respondents	Number of Responses per Respondents	Total Annual Responses	Burden Hours/Minutes per Response	Total Government Burden Hours	Government Hourly Cost	Total Government Annual Costs
Concept Paper -Needs Assessment and Gap Analysis	40	6	240	2	480	\$60	\$28,800
Concept Paper – Technical approach, Activities, and Oversight	40	6	240	5	1,200	\$60	\$72,000
Concept Paper- Budget Overview	40	6	240	1	240	\$60	\$14,400

Concept Paper - Commodity Table	40	6	240	1	240	\$60	\$14,400
Concept Paper- Map of Proposed Target Areas	40	6	240	1	240	\$60	\$14,400
Concept Paper- Past Performance	40	6	240	4	960	\$60	\$57,600
SF-424 (4040-0004)	14	3	42	4	168	\$60	\$10,080
Full Application- Expanded Technical Narrative	14	3	42	10	420	\$60	\$25,200
Full Application- Organizational Capacity and Staffing Narrative	14	3	42	2	84	\$60	\$5,040
Full Application- Organization Chart	14	3	42	1	42	\$60	\$2,520
Full Application- In-Country Registration	14	3	42	1	42	\$60	\$2,520
Full Application-Most Recent Single Audit	14	3	42	5	210	\$60	\$12,600
Negotiated Indirect Cost Rate Agreement	14	3	42	1	42	\$60	
Full Application- Sub-Recipient Information	14	3	42	2	84	\$60	\$5,040
Full Application – Indicator Table	14	3	42	2	84	\$60	\$5,040
Results Framework	14	3	42	2	84	\$60	\$5,040
Monitoring and Evaluation Brief (3 pages)	14	3	42	5	210	\$60	\$12,600
Full Application- Commodity Table	14	3	42	1	42	\$60	\$2,520
Full Application- Commodity Management Plan	14	3	42	2	84	\$60	\$5,040
Full Application- Budget Summary	14	3	42	1	42	\$60	\$2,520
Full Application- Budget Narrative	14	3	42	10	420	\$60	\$25,200
Full Application – Detailed Budget	14	3	42	3	126	\$60	\$7,560
Grants.gov Lobbying Form	14	3	42	1	42	\$60	\$2,520
SF-LLL	14	3	42	1	42	\$60	\$2,520
Agreements Signed	14	3	42	4	168	\$60	\$10,080
Amendments Requested	14	3	42	2	84	\$60	\$5,040
Amendments Signed	10	3	30	2	60	\$60	\$3,600
Performance Report	14	6	84	2	168	\$60	\$10,080
Financial Report	14	6	84	2	168	\$60	\$10,080
Risk Management Plan	14	3	42	4	168	\$60	\$10,080
Distribution Plan	14	3	42	4	168	\$60	\$10,080
Evaluation Plan	14	3	42	4	168	\$60	\$10,080
SF-270 Claim (4040-0012)	14	6	84	1	84	\$60	\$5,040
SF-425 Financial Report (4040-0014)	14	6	84	1	84	\$60	\$5,040
Closeout Report	14	1	14	4	56	\$60	\$3,360
TOTALS	40	89.65	2,786	-	7,004		\$417,720

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

This is a new collection request. The total number of expected respondents is 40, total annual responses are 2,786, and total burden hours 25,474. Prior to this new collection request, FAS has received approval to utilize generic collection OMB control number: 0503-0028; expiration date: 10/31/2027 for pre-award requirements.

16. If the information will be published, outline plans for tabulation and publication.

FAS has no plans to tabulate or publish the information that is being 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.

We are not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions.

