

**Supporting Statement for Paperwork Reduction Act
Special Nutrition Programs (SNP)**

Justification for Adding

Farm to School Grant to the

List of Approved Programs Using Uniform Grant Application for

Non-Entitlement Discretionary Grants,

OMB Control Number 0584-0512

- 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.

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended Section 18 of the Richard B. Russell National School Lunch Act (NSLA) to establish a Farm to School program in order to assist eligible entities, through grants and technical assistance, in implementing farm to school programs that improve access to local foods in eligible schools.

To fulfill the farm to school mandate in the HHFKA, effective October 1, 2012, \$5 million will be provided to the United States Department of Agriculture (USDA) on an annual basis to support grants, technical assistance, and the Federal administrative costs related to USDA's farm to school program. The USDA Food & Nutrition Service (FNS) is charged with implementing this new competitive grants program and intends to solicit

applications for farm to school Planning grants and Implementation grants. In order to select the most appropriate grantees, a competitive request for applications is necessary. Eligible entities will prepare an application.

Beyond the \$5 million in funding provided in the HHFKA, in fiscal year (FY) 2016 USDA anticipates the availability of an additional \$1 million in grant funding to support placement of volunteer service members (e.g., AmeriCorps, VISTA, local service corps programs, etc.) in schools throughout the country to build or maintain school gardens, incorporate nutrition education into the schools' culture, and support school food service personnel in procuring or promoting local and regional products for the school meal program. These funds will be distributed using the existing support service grant track.

FNS will post the Request for Application (RFA) package for the *Farm to School Grant Program* on its website on or about February 26, 2015 at <http://www.fns.usda.gov/cnd/f2s/> and on www.grants.gov.

2. Indicate how, by whom, and for what purpose the information is to be used.

Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The primary users of the information collected from the applicants are FNS and other Federal staff who will serve on a panel to systematically review, evaluate, and approve the grant/cooperative agreement applications and recommend the applicants most likely to meet program objectives and most responsive to the solicitation. The

selection criteria are contained in the RFA package. This process will occur only once this year.

The following grants.gov forms are required of grant applicants. They are located at http://www.grants.gov/agencies/aforms_repository_information.jsp: Click Active Forms.

Non-Construction Grant Projects Forms: SF-424 Family

1. Application and Instruction for Federal Assistance (SF424)
2. Budget Information and Instruction (SF-424A)
3. Assurance-Non-Construction Programs (SF-424B)
4. Farm to School Grant Program Application Cover Sheet
5. Disclosure of Lobbying Activities (SF LLL):

The following required OMB form can also be obtained at:

<http://www.whitehouse.gov/sites/default/files/omb/grants/sflllin.pdf>

In addition, in compliance sections 738 and 739 of the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2012 (Public Law 112-55) Corporate Felony Convictions and Corporate Federal Tax

Delinquencies, excluding State, Local and Tribal Government all other applicants are required to fill-out and submit a Assurance Statement with their completed RFA package. The form is available at <http://www.ocio.usda.gov/document/ad3030>.

Lastly, applicants awarded a grant will be required to submit either on a quarterly or semi-annual basis, depending on the type of award (planning, implementation, support

service or training grant) the following form

(http://www.whitehouse.gov/omb/grants_forms/): SF-425, Federal Financial Report.

- 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.**

In compliance with E-Government Act 2002, FNS offers applicants the opportunity to receive and provide information electronically. Applicants may receive the RFA package by downloading the application from the FNS website or by downloading the application from the www.grants.gov website. 85% of applicants will apply for this opportunity directly through www.grants.gov. FNS will not accept emailed faxed, or hand delivered applications. 15% of applicants (Training grants only) will submit a letter of interest via e-mail.

FNS estimates that approximately 75% of the grant awardees will report financial data electronically through FNS' Food Programs Reporting System (FPRS) at <https://fprs.fns.usda.gov/Home/Reminder.aspx>.

- 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 Question 2.**

There is no similar data collection effort available. This program solicitation is new and unique. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely administers the school meal programs. The information required for this study is not currently reported to State Agencies on a regular basis in a standardized form.

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 information request is held to the minimum amount required. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Circumstances limit the flexibility in modifying the reporting and recordkeeping requirements. FNS estimates that 25 percent of our respondents are 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.

FNS will seek minimal information that will be critical in selecting the most promising grantees. The consequence for not collecting the information is the inability to establish the Farm to School Grant Program as mandated by Congress in the HHFKA.

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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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. 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 recordkeeping, disclosure, or reporting format (if any), and on the 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 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice was published in the Federal Register on July 27, 2012, (Volume 77, pages 44210 -44213) soliciting comments on FNS's intent to request Office of Management and Budget (OMB) approval for a uniform grant application package for FNS discretionary grant programs that is a revision of the previously approved package.

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

There are no plans to provide cash payments or gifts to respondents.

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

Provision of the application information requested is entirely voluntarily. The collection of this information is for the purpose of aiding in the review of applications prior to grant award decisions and for management of grants. This information will be used within FNS and may also be disclosed outside FNS as permitted by the Privacy Act under certain situations, including disclosures to the public as required by the Freedom of Information Act. All activities associated with the agreement respect the existing policy with regard to confidentiality. FNS will work with the Grantee and ensure that any release of such information is done under the terms and conditions of the existing Freedom of Information Act that requires that the Grantee provides release permission and is informed of the use of the information.

Grantees who are awarded an Implementation and Support Service Grants will be required to submit the SF 425 forms online. The grantees awarded Planning or Training Grants will submit the SF-425 in a hard copy. All of the SF-425 forms are stored in a secured database. Therefore, Implementation and Support Service grant awardees must obtain authorization to submit the form into FPRS. The applications for authorization contain personal identifying information on individuals doing business with the Food and Nutrition Service. Therefore, the Food and Nutrition Service published USDA e-Authentication Service (system of records) July 26, 2006 in the Federal Register Volume 71 page 42346 to specify the uses to be made of the information in this collection.

Access to records is limited to those persons who process the records for the specific uses stated in this Privacy Act notice. Records are kept in physically secured rooms and/or cabinets. Paper records are segregated and physically secured in located cabinets. 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 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.

There are no questions of a sensitive nature included in this data collection.

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.

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.

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

FNS estimates that approximately three hundred fifty-five (355) respondents will submit an application for the Farm to School Grant Program. It is estimated that the average applicant will spend 60 hours developing their proposals. This is based on the general fact that applicants will have about six weeks to complete their proposals. We expect school district and schools will represent the majority of submissions, while other eligible entities, noted below, will constitute the remaining submissions. The 60 hour burden estimate includes the completion and submission of all required forms noted in question 2.

A.12.1 Estimate of Hours Burden on Respondents for Application

Pre-Award Burden

Affected Public	Estimated No. of Respondents	Frequency of Response	Total Annual Responses	Estimated Time (Hours) to complete each Application	Total Estimated Burden Hours
State, Local and Tribal Agencies	195	1	195	60	11,700
Businesses	160	1	160	60	9,600
Total Burden	355	1	355	60	21,300

Pre Award Reporting Burden Summary:

Number of Respondents: 355

Responses per respondent: 1

Total Annual Response: 355

Hours per Response: 60

Total Burden Hours: 21,300

There are three types of reports that awardees may submit post-award:

- **Progress and Financial Report:** Progress reports will ask for a description of the activities that took place during the previous period and report any

deviations and difficulties. The financial report is the SF-425. The SF-425 is submitted with each progress report and is the short form for reporting the financial status for the previous period. These reports are routine in nature and only request necessary information to monitor the progress and funds spent during the period of performance of the grant or cooperative agreement. FNS estimates the awardees will spend 1 hour on each progress report and .5 hours on each financial report.

- **Final Progress and Financial Report:** The final progress reporting template will include basic monitoring questions and questions from the baseline survey to help program staff assess the impact of the overall project. FNS estimates the awardees will spend 1 hour on the final progress report. In addition to the final reporting template, grantees will submit a final SF-425 report, which serves as the final financial status report. FNS estimates the awardees will spend .5 hours on the final financial report.
- **Baseline Survey:** The baseline survey will establish the existing state of farm to school activities in order to ultimately measure program impact. FNS estimates the awardees will spend .5 hours on the baseline survey. Training grants do NOT complete a baseline survey.

Planning grants post-award burden hours are based on the production of semi-annual progress and financial reports, a baseline survey, and the final report.

Planning grants run 18 months and thus the grantee will submit 3 semi-annual progress and financial reports. Planning Grant reports are submitted online.

Implementation and Support Service grants, post-award burden hours are based on the production of quarterly progress and financial reports. Implementation and Support Service grants may range from 1 – 2 years as determined by individual grantees. For the purposes of this estimate, we assume the average Implementation and Support Service grant will be 18 months in duration and thus the grantee will submit 5 quarterly progress and financial reports. Implementation and Support Service reports are submitted online.

Training grants post-award burden hours are based on the production of semi-annual progress and financial reports. Training grants are awarded for a 12 month period and thus the grantee will submit 2 semi-annual progress and financial reports. Training grants submit progress reports via email.

No more than 25 Planning grant proposals, 35 Implementation and Support Service, and 20 Training grant proposals will be selected for funding. The total estimated burden on awardees is reflected in the following table.

The total estimated burden is reflected in the following table:

A.12.2 Post-Awardees Burden Estimates Estimate of Hours Burden on Respondents for Application (Affected Public: State, Local and Tribal Agencies; Business-for-not-for-profit)

Action	Number Respondents	Response per Respondent	Total Responses	Hours per Response	Total Burden
Planning Grants					
Semi-Annual Progress and Financial Report (3)	25	3	75	1.5	112.5
Annual/Final Report (1)	25	1	25	1.5	37.5
and baseline survey (1)	25	1	25	.5	12.5
Subtotal	25	5	125	1.3	162.5
Implementation and Support Service Grants					
Quarterly Progress and Financial Reports (5)	35	5	175	1.5	262.5
Annual/Final Report (1)	35	1	35	1.5	52.5
Baseline survey (1)	35	1	35	.5	17.5
Subtotal	35	7	245	1.4	332.5
Training Grants					
Semi-Annual Progress and Financial Report (2)	20	2	40	1.5	60
Annual/Final Report (1)	20	1	20	1.5	30
Subtotal	20	3	60	1.5	90
Total	80	5	430	1.36	585

Post Award Reporting by Respondent Type:	Respondents	Freq of Response	Annual Responses	Hours per Response	Total Burden
State, Local and Tribal Agencies	44	5	236	1.360	321
Businesses	36	5	194	1.360	264
Total	80	5	430	1.360	585

Post Award Reporting Burden Summary:

Number of Respondents: 80

Responses per respondent: 5

Total Annual Response: 430

Hours per Response: 1.36

Total Burden Hours: 585

Total Reporting by Respondent Type:					
Respondent Type	Respondents	Freq of Responses	Annual Responses	Hours per Response	Total Burden
State, Local and Tribal Agencies	195	2.21	431	27.879	12,021
Businesses	160	2.21	354	27.879	9,864
Total	355	2.21	785	27.879	21,885

Pre-and Post Award Reporting Burden Summary:

Number of Respondents: 355

Responses per respondent: 2.21

Total Annual Response: 785

Hours per Response: 27.88

Total Burden Hours: 21,885

A.12.3 Post-Awardees Recordkeeping Burden Estimates Estimate of Hours Burden on Respondents for Application (Affected Public: State, Local and Tribal Agencies; Business-for-not-for-profit)

AFFECTED PUBLIC	(b) Form Number or activity	(c) No. Recordkeepers	(d) No. Records Per Respondent	(e) Est. Total Annual Records (cxd)	(f) Hours Per Recordkeeper	(g) Total Burden (exf)	
State, Local and Tribal Agencies; Business-for-not-for-profit	RECORDKEEPING						
	Planning Grants						
	SF-425 Final Report	25	1	25	0.05	1.25	
	SF-425 Semi-Annual Financial Reporting	25	3	75	0.1169	8.77	
	Subtotal	25	4	100	0.10	10.02	
	Implementation and Support Service Grants						
	SF-425 Final Report	35	1	35	0.05	1.75	
	SF-425 Quarterly Financial Reporting	35	6	210	0.1169	24.55	
	Subtotal	35	7	245	.11	26.3	
	Training Grants						
	SF-425 Final Report	20	1	20	0.05	1	
	SF-425 Semi-Annual Financial Reporting	20	2	40	0.1169	4.68	
	Subtotal	20	3	60	0.095	5.68	
	Post Award Recordkeeping Total Burden Estimates		80	5.06	405	0.104	42.00

Total Recordkeeping by Respondent Type:					
Respondent Type	Respondents	Freq of Responses	Annual Responses	Hours per Response	Total Burden
State, Local and Tribal Agencies	44	5.06	222	0.104	23
Businesses	36	5.06	183	0.104	19
Total	80	5.06	405	0.104	42

Post Award Recordkeeping Burden Summary:

Number of Respondents: 80

Responses per respondent: 5.06

Total Annual Response: 405

Hours per Response: .104

Total Burden Hours: 42

Grand Total by Respondent Type:					
Respondent Type	Respondents	Freq of Responses	Annual Responses	Hours per Response	Total Burden
State, Local and Tribal Agencies	195	3.35	654	18.426	12,044
Businesses	160	3.35	536	18.426	9,883
Total	355	3.35	1,190	18.426	21,927

The total estimated burden hours for pre & post-award reporting and post award recordkeeping is 21,927 (pre-award 21,300 burden hours + 585 post-award + 42 recordkeeping burden hours). The total estimated number of responses for pre & post reporting and recordkeeping is 1,190 total annual responses (pre-award 355 responses + post-award responses 430 and post award recordkeeping response 405).

The total estimated annual cost to respondents is \$809,325.48. The range for this estimate may vary significantly but FNS believes the cost-per-hour estimate is the most practicable and represents the national rate for Social Scientists and Related Workers, All Others - Occupation Code 19-3099 (according to the Bureau of Labor Statistics, Occupational Employment Wages February 2015).

Total Pre-award cost to the public was calculated by estimating 355 applicants will spend approximately 60 hours each at \$36.91 hourly wage = \$786,183. Pre-award costs are one time only costs.

Total Post-award costs for routine reporting are 627 (post award burden + post award record keeping burden rounded to whole number) hours x \$36.91 = \$ 23,142.48.

Post award costs are annual costs for the duration of the project.

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 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.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information 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.

Costs are estimated for two categories:

(1) The annualized costs for awarding and managing this grant program are expected to total about \$20,561.60 based on the assumption that we will award 80 grants. FNS grants management and program staff will spend approximately one hour reviewing each progress, financial and final report (405) for a total of 405 hours. The estimate assumes an hourly cost per staff person of \$50.77 per hour (the average salary for

GS-13 grade level including overhead and benefits). Wage rates were determined based on the Office of Personnel Management salary table for FY 2015 for a GS 13, Step 5 employee.

(2) FNS staffing costs, which are identified below.

The estimated cost to process and review applications is \$360,467. This is based on an estimate of a total of 20 hours of labor to process and review *each* application package. The estimate assumes an hourly cost per staff person of \$50.77 per hour (the average salary for GS-13 grade level including overhead and benefits). This labor estimate includes 2 hours by grants management and program staff to process an application, 15 hours total by 3 employees (including both Federal and non-Federal employees) to conduct a thorough technical review of each application, and 3 hours by the grants and program officers to document the technical reviews and prepare the recommendations for award. Assuming 355 applications will be received, it is anticipated that 7,100 hours will be needed to process and review these applications. Costs other than salary costs are negligible. Wage rates were determined based on the Office of Personnel Management salary table for FY 2015 for a GS 13, Step 5 employee.

Total hours:	7,505 hours
Total Annualized Cost to the Federal Government:	\$381,029

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

This request will decrease the current burden inventory by 21,927burden hours and

responses by 1,190 total annual responses .

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

There are no plans for tabulation and publication of this information collection.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that this display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act".

There are no exceptions to the certification statement.