

Supporting Statement for
Uniform Grant Application for Non-Entitlement Discretionary Grants
(OMB Control Number 0584-0512)

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- 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 information collection is a revision of a currently approved package for all non-entitlement discretionary grant programs to collect information from grant applicants. The Food and Nutrition Service (FNS) has a number of non-entitlement discretionary grant programs. The term “grant” in this submission refers only to non-entitlement discretionary grants or cooperative agreements. This information collection is for the announcement of discretionary grants via Requests for Applications (RFA) and subsequent reporting and recordkeeping for the grant awardees.

This information collection is needed to evaluate and rank applicants and protect the integrity of the grantee selection process, as well as evaluate performance post-award. With this clearance request, FNS is submitting RFAs and forms for regularly issued grants. Other FNS discretionary grants would use this generic collection by submitting a request for clearance under this generic collection. The submissions will include a supporting statement, RFA, and any associated forms. All FNS discretionary grant programs would be eligible, but not required, to use this uniform grant application package. If FNS decides not to use the uniform grant application package or determines that it needs grant applicants to provide additional information not contained in the uniform package, then FNS will publish a notice soliciting comments on its application to collect different or additional information before making the grant solicitation.

The generic clearance now in effect has provided clearance for the following Grant programs. The authorities for these grants vary and are listed in the table below. The legal or administrative authorities for other potential programs requesting use of this generic information collection will be noted in the supporting statement submitted with each request, but will be similar to those listed below.

Appendix (ICs)	DISCRETIONARY GRANTS/COOPERATIVE AGREEMENTS	PROGRAM AUTHORIZATION
A1	Child Nutrition - Team Nutrition Training Grants	Child Nutrition Act of 1996, as amended 19(c)
A2	Child Nutrition – Direct Certification Grants	Richard B. Russell National School Lunch Act, as amended, Section 9(b) (4) & Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2010 (P.L. 111-80), Section 749(h)
A3	Child Nutrition – Administrative Review & Training Grants	Richard B. Russell National School Lunch Act, as amended, Section 22
A4	Child Nutrition – Farm to School Grants	Richard B. Russell National School Lunch Act as amended, Section 18(g) (3), by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)
A5	Child Nutrition – Professional Standard School Food Training Grants	Richard B. Russell National School Lunch as amended, Section 306 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)
A6	Food Distribution Program – Nutrition Education Grants	Food and Nutrition Act of 2008 as amended, Section 17 (a) (1)
A7	Supplemental Nutrition Assistance Program – Farmers’ Market SNAP Support Grants	The President’s FY 2014 budget request for FNS (<i>The Food and Nutrition Service: 2014, Explanatory Notes</i>),
A8	Supplemental Nutrition Assistance Program – Process and Technology Improvement	Food and Nutrition Act of 2008 as amended, Section 11 (t)(1)
A9	Supplemental Nutrition Assistance Program – Recipient Integrity Grants	Food and Nutrition Act of 2008, as amended, Section 29 (7 U.S.C. 2036b)
A10	Special Supplemental Nutrition Program for Women, Infants and	Child Nutrition Act of 1996 as amended, Section 17(h)(10)(B)(i)(III)

	Children – Special Projects and Concept Papers	
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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 will be contained in the RFA package. Post-award, the primary users are FNS staff who will evaluate the on-going and final performance of the awarded grants.

The generic information collection applies to grantees from States and local governments, Indian Tribal organizations, Non-Profit organizations, For-Profit organizations, and Institutions of Higher Education.

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 the 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. All applicants will apply for this opportunity directly through www.grants.gov. There will be no exceptions. FNS will not accept emailed, faxed, or hand delivered applications.

FNS estimates that approximately 100% of the grant awardees will complete post-award reporting financial data using the SF-425 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.

Applications are unique and program specific. There is no similar data collection effort available.

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 requested is the minimum amount required to meet program requirements. It cannot be reduced for small businesses or entities. Although some grantees may be considered a small business or 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. FNS estimates that 25 percent of our respondents, including for-profit and non-profit organizations are small businesses or 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.

If the information is not collected, the programs will not have adequate data to select appropriate grantees, evaluate which grants should be continued, or monitor financial reporting requirements. FNS will seek minimal information that will be critical in selecting

the most promising grantees. Reduced frequency is not possible as the annual frequency of applications coincides with the annual appropriation of funds.

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 that require the collection to be conducted in the manner stated above.

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 notice was placed in the Federal Register on November 23, 2015 at 80 FR 72945 soliciting comments on FNS's intent to request OMB approval for a uniform grant application package for FNS discretionary grant programs. No comments were received in response to the Federal Register notice. Additionally, FNS discusses the availability of the various grant opportunities and the grant application requirements with potential applicants at various national or regional meetings. For example, FNS discussed the application process at several webinars throughout FY 2014 and 2015 and did not receive comments or requests to modify the process.

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 payment 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.

FNS is requesting the information called for in this application package pursuant to its statutory authority to award grants. Provision of the information requested is entirely voluntary. 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. The only personally identifiable information is requested from potential applicants is included on SF-424. This information may be used within FNS but will not be disclosed outside of FNS except as permitted by the Privacy Act, including disclosures to the public as required by the Freedom of Information Act.

Grantees will be required to submit semi-annual or quarterly SF-425s, financial status reports.

These reports will be stored in a secured database. Therefore, grantees must obtain authorization

to submit the form into FPRS. The applications for authorization contain personally identifying information on individuals doing business with Food and Nutrition Service. Therefore, the USDA published the USDA e-Authentication Service (system of records) March 14, 2012 in the Federal Register at 77 FR 15024 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. 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 the uniform grant application package for discretionary grant programs.

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.

A detailed burden table is included as Appendix B – 0584-0512 Burden Table. The total burden requested under this ICR is as follows:

	Responses	Hours
3 Year Total Requested:	30,000.00	150,000.00
Total Used for ICs submitted with this renewal:	9,795.00	40,639.76
Total Remaining:	20,205.00	109,360.24

Pre-Award Burden Estimates:

Pre-award burden is the burden associated with the grant RFA package. The uniform grant RFA package will include: (a) general information and instructions and requirements for the program narrative statement describing how the grant objectives will be reached as well as a description of the budget; (b) USDA disclosure forms; (c) Grants.gov Standard Forms that request basic information, budget and financial information, and disclosure of lobbying activities.

(a) General Information and Instructions and program narrative requirements – The above list of grants (see question 1) are submitted for continued clearance under this generic. RFAs for these grants, which includes the general information and instructions, etc., are included in the Appendix A (and submitted under this request as ICs). For other grants submitted under this generic clearance, the RFA will be submitted with the clearance request, but will be similar to those included in the appendix.

(b) USDA Disclosure Forms – These forms are approved by OMB but burden is accounted for within this collection per the terms of clearance for the USDA forms.

- AD-3030 - Corporate Felony Convictions and Corporate Federal Tax Delinquencies (OMB No. 0505-0025, Expiration date 2/29/2016). This form is required in compliance with Sections 744 and 745 of the Consolidated Further Continuing Appropriations Act, 2015 (Public Law 113-235) Corporate Felony Convictions and Corporate Federal Tax Delinquencies, for for-profit and non-profit business applicants.

- AD-1047 - Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions (OMB No. 0505-0027, Expiration date 12/31/2018).
- AD-1048 - Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions (OMB No. 0505-0027, Expiration date 12/31/2018).
- AD-1049 – Certification Regarding Drug-Free Workplace Requirements for Grantees Other Than Individuals (OMB No. 0505-0027, Expiration date 12/31/2018).
- AD-1052 – Certification Regarding Drug-Free Workplace for State and State Agencies (OMB No. 0505-0027, Expiration date 12/31/2018).

(c) Grants.gov Forms – The following grants.gov forms are required of grant applicants.

- Non-Construction Grant Projects Forms: SF-424 Family:
 1. Application and Instruction for Federal Assistance (SF-424), OMB Control Number 4040-0004, Expiration Date: August 31, 2016
 2. Budget Information for Non-Construction Programs (SF-424A), OMB Control Number 4040-0006, Expiration Date: January 31, 2019
 3. Assurances - Non-Construction Programs (SF-424B), OMB Control Number 4040-0007, Expiration Date: January 31, 2019.
 4. Application for Federal Assistance Research & Related Projects (SF-424 R & R), OMB Control Number 4040-0001, Expiration Date: June 30, 2016.

- SF LLL -- Disclosure of Lobbying Activities, OMB Control Number 4040-0013, Expiration Date: January 31, 2019. The form is used to indicate whether the applying organization intends to conduct lobbying activities.

Post-Award Burden Estimates:

Post-award reporting burden hours are based on the production of semi-annual or quarterly progress reports and quarterly financial reports using the SF-425.

Additionally, grantees submit one final report and a final financial report (SF-425).

- ***Progress and Final reports:*** The progress and final reports will ask for a description of the activities that took place during the previous period and report any deviations and difficulties. Based on an annual average period of performance, each grantee will submit either 2 semi-annual or 4 quarterly progress reports (averaged to 3 annual progress and financial reports in the burden table).
- ***Quarterly and Final Financial Reports:*** The financial reports will be the SF-425 (SF-425, Federal Financial Report, (OMB Control Number 4040-0014; Expiration Date: January 31, 2019), which is the short form for reporting the financial status for the previous period, with the last SF-425 serving as the final financial status report. 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.

Post-award recordkeeping burden includes maintaining forms submitting during the RFA and post-award.

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

Wage rates were determined using <http://www.bls.gov/bls/wages.htm> website. The total annualized cost to respondents for the burden hours used with this submission is \$1,786,248.

Estimates of Annualized Cost to Respondents

Type of Applicant	BLS Category	Hourly Wage Rate	Burden Hours	Estimated Annual Cost
State & Local Government	11-9032 Education Administrators, Elementary and Secondary School - Average of State and Local Government	\$42.16	24,787	\$ 1,072,546.47
School & School Districts	11-9032 Education Administrators, Elementary and Secondary School - Elementary and Secondary Schools	\$43.44		
Universities	11-9033 Education Administrators, Postsecondary —Junior College	\$40.61		
Indian Tribal Governments	11-9032 Education Administrators, Elementary and Secondary School - Local Government	\$46.85		
SLT Average Wage		\$43.27		
Non-profit Organizations	21-0000 Community and Social Service Occupations	\$21.07	15,852.46	\$ 334,011.33
Producer Groups	21-0000 Community and Social Service Occupations	\$21.07		
Business Average Wage		21.07		
Total Annualized Cost			40,639.76	\$ 1,406,557.80

The total estimated cost for 150,000 hours over three years is estimated as \$ 5,158,500.00 (90,000 hours * \$43.27 + 60,000 hours * \$21.07).

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 costs, operating costs, or maintenance to report.

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.

It is estimated that within FNS there is an average of about 20 hours of labor required to process an application package for this data collection. This labor estimate includes time spent by grants management operations and program staff to process an application (2 hours) and time spent by Agency staff to conduct a thorough technical review of each application (3 staff x 6 hours). Assuming 829, applications will be received on average, during FY 2016- 2018, it is anticipated that 16,580 hours will be needed to process and review these applications. Assuming that the Agency staff participating in the processing and review of these applications makes approximately \$49.32 per hour, the estimated annual cost to the Federal Government is \$ 817,725.60 (16,580 hours X \$49.32). The cost for the 3-year processing and reviewing these applications is \$2,453,176.80. (In addition, the grants themselves are expected to total about \$75-\$100 million depending on how many grants are funded on a competitive basis and the merits of the applications received.) Wage rates were determined based on the Office of Personnel Management salary table for FY 2015, GS 13, Step 5.

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

This is a revision to the currently approved information collection. FNS is requesting a 3-year total generic burden of 150,000 hours and 30,000 responses. This is an increase of 26,097 hours and 25,239 responses. There were additional grant programs added to the collection activities in FY 2015. This occurred because of new programs included in authorizing Program legislation. This is mainly attributed to several new discretionary grant programs that were added from the 2010 Healthy, Hunger-Free Kids Act of 2010 (Child Nutrition/WIC Reauthorization Act) and the 2008 Farm Bill.

Additionally, FNS added responses to account for the use of USDA and standard forms (this resulted in a significant increase to the number of responses requested). Of the 150,000 hours requested, 40,640 are used for ICs submitted with this clearance, leaving 109,360 hours (and 20,205 responses).

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

Information in the grant applications will not be published. Disclosure of information contained in the grant application package is subject to the Freedom of Information Act and The Privacy Act. FNS will publicize summary information of the applicants that receive funding at the FNS website, <http://www.fns.usda.gov>.

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.

FNS will display the expiration date of OMB approval.

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.