

Supporting Statement
Justification for Adding
Application and Reporting Forms Specific to
TEFAP Reach & Resiliency – Round 2 Grants
to the OMB-Approved Generic IC on Uniform Grant Application for
Non-Entitlement Discretionary Grants,
OMB Control Number 0584-0512

(Note: The TEFAP Reach & Resiliency Grants are Already Covered in 0584-0512)

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Appendices

Appendix A - Additional Questions for TEFAP Reach and Resiliency – Round 2 Grant

- 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.**

Utilizing funding and authority provided by Section 1001(b)(4) of the American Rescue Plan Act (ARPA, P.L. 117-2), USDA established a grant program for State agencies that administer The Emergency Food Assistance Program (TEFAP), aimed at strengthening infrastructure and expanding TEFAP's reach into rural, remote, Tribal, and low-income communities. Round 1 of the TEFAP Reach and Resiliency Grants have already been offered. FNS will be offering Round 2 in December 2022 thereabouts.

The TEFAP Reach and Resiliency Grants are already covered under OMB approval #0584-0512. But FNS needs to add to 0584-0512 some additional questions that will be asked of grant applicants and requests that will be made that were not included with FNS original submission for 0584-0512.

In order to select the most appropriate grantees for the program, a competitive request for applications is necessary. Eligible entities will prepare an application to the uniform grant application (already covered under OMB Control Number: 0584-0512, Expiration Date: 07/31/2025), which will include up to ten additional questions related to the goals of the Reach and Resiliency grants. These questions will be outlined in the Request for Applications for the TEFAP Reach and Resiliency - Round 2 Grant and be incorporated into the Round 2 grant application template. State agencies will have the option to use the optional template or any other format to answer the questions. The additional questions are included in Appendix A.

To measure impact of the grants and to determine whether the grants achieve their intended purposes, grantees will be required to provide narrative, biannual progress reports using the FNS-908 Performance Progress Report form, as a condition to accepting grant funding. In addition to this standard form, grantees will be asked to respond to two more questions related to progress made toward achieving the goals of the grant program, on a biannual basis. The two additional questions will be outlined in the Request for Applications for the TEFAP Reach and Resiliency – Round 2 grant. A template submission form will be provided to grantees to report this information, but they will have the option of reporting the information in any format they choose.

In sum, we request to add to FNS' Uniform Grant Application for Non-Entitlement Discretionary Grants (OMB Control Number: 0584-0512, Expiration Date: 07/31/2025), up to ten additional application questions and up to two additional reporting questions. The additional questions that will be asked of applicants and grantees are included here as Appendix A. The TEFAP Reach and Resiliency Grants themselves are already covered under OMB approval #0584-0512. We need to add only the additional questions to be asked of applicants for TEFAP Reach and Resiliency -Round 2 Grants.

The TEFAP Reach and Resiliency Grants are already covered in OMB approval #0584-0512. What's not covered are the additional application and reporting forms which will

be used specifically for the TEFAP Reach and Resiliency – Round 2 Grants. For that reason, the Food and Nutrition Service (FNS) is submitting this information collection request.

Section 1001 of the American Rescue Plan Act, 2021 (ARPA) is as follows:

(b) USE OF FUNDS.—The Secretary of Agriculture shall use the amounts made available pursuant to subsection (a)—

- (1) to purchase food and agricultural commodities;
- (2) to purchase and distribute agricultural commodities (including fresh produce, dairy, seafood, eggs, and meat) to individuals in need, including through delivery to nonprofit organizations and through restaurants and other food related entities, as determined by the Secretary, that may receive, store, process, and distribute food items;
- (3) to make grants and loans for small or mid-sized food processors or distributors, seafood processing facilities and processing vessels, farmers markets, producers, or other organizations to respond to COVID–19, including for measures to protect workers against COVID–19; and
- (4) to make loans and grants and provide other assistance to maintain and improve food and agricultural supply chain resiliency.

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 additional information will be used by USDA’s Food and Nutrition Service (FNS), the Agency that will administer the grant program. Information collected via the application process will be used to determine if State agencies’ plans for the funding meet the intended purposes; and funding will only be distributed to those TEFAP State agency plans that do. Information collected via reporting will be used by FNS to monitor the impact of the grant, monitor the spend-down of funds, and to measure progress toward grant objectives.

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. All applicants will apply for this opportunity directly through www.grants.gov. FNS will not accept emailed faxed, or hand delivered applications.

FNS estimates that 100 percent 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> using the SF-425 form.

FNS-908 narrative progress reports and any responses to supplemental reporting questions will also be submitted electronically via e-mail to program staff.

All of the forms referenced above have already been approved by OMB. This information collection only addresses the additional questions for the TEFAP Reach and Resiliency – Round 2 Grants which will be part of the application and reporting process.

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 for Round 2 of TEFAP Reach and Resiliency Grants is new and unique. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state agency reporting requirements, and special studies by other government and private agencies. FNS solely administers TEFAP. The additional questions that will be asked of applicants/grantees (included here as Appendix A) are not currently reported by 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 collection of information does not impact small businesses or other small entities. Eligible respondents to the request for applications will be State agencies that administer TEFAP.

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 ensuring that the grant funding achieves its intended purpose. The consequence for not collecting the information is the inability to administer Round 2 of the TEFAP Reach and Resiliency grant program.

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.**

The information collection will not be conducted in any of the above mentioned manners.

- 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.

Consistent with the requirement in OMB approval # 0584-0512, an FR notice was published in the Federal Register at 87 FR 62786 on October 17, 2022, soliciting comments on FNS's intent to request additional information not contained in the uniform grant application package.

FNS received 0 comments on the FR notice, and thus did not make any changes to the information collection package in response to comments received.

- 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.

Application to the grant program is voluntary for State agencies. 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, and monitoring progress on grant awards made. 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 privacy. 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 will be required to submit the SF-425 online. All of the forms are stored in a secured database. Therefore, 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.

Submission of the FNS-908 Performance Progress Report and the answers to the two supplemental reporting questions will be submitted via e-mail to program staff. Information collected will not be published in non-aggregate form unless explicit permission from grantees is granted.

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.

Burden hours (taking into account all the additional forms/questions for TEFAP Reach and Resiliency Grants) have already been approved by OMB. However, the additional forms/questions for TEFAP Reach and Resiliency Grants were not included in the original 0584-0512 submission.

There are no changes to the burden for TEFAP Reach and Resiliency Grants already included in OMB control # 0584-0512, previously approved.

Below is the information included in # 0584-0512 for this grant program and previously approved by OMB.

Pre-Award, Post-Award, and Recordkeeping Reporting

TEFAP Reach and Resiliency grants

Respondents: 54

Frequency of Response: 1

Total annual responses: 54

Estimated time to complete each application: 88.22 hours

Grand total burden hours pre and post-award: 4,764

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

Annualized costs to respondents (taking into account all the additional forms/questions for TEFAP Reach and Resiliency Grants) have already been approved by OMB under 0584-0512. However, the additional forms/questions themselves for TEFAP Reach and Resiliency Grants were not included in the original 0584-0512 submission.

There are no changes to the costs previously approved by OMB under 0584-0512.

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.

This is not applicable to this information request

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.

This is not applicable to this information request

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

This is not applicable to this information request

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

Baseline and final report data may be aggregated, anonymized, and published in a future USDA report that seeks to evaluate the success of the TEFAP Reach and Resiliency Grant Program. No formal plans have been established for this publication. Additionally, data collected from progress reports may be used to develop USDA resources that highlight TEFAP Reach and Resiliency best practices. Highlights of specific grantees will not be done without the grantees' express content.

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.

FNS will 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.