

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

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.

On January 29, 2001, President George W. Bush issued Executive Order 13198, creating the Office for Faith-Based and Community Initiatives in the White House and centers for faith-based and community initiatives (CFBCI) in the Departments of Labor (DOL), Health and Human Services (HHS), Housing and Urban Development (HUD), Education (ED), and Justice (DOJ). President Bush charged the departmental centers with identifying statutory, regulatory, and bureaucratic barriers that stand in the way of effective faith-based and community organizations, and to ensure, consistent with the law, that these organizations have equal opportunity to compete for federal funding and other support.

In early 2002, the CFBCI and ETA developed and issued Solicitations for Grant Application (SGA) to engage grassroots organizations in our workforce system-building. These SGAs were designed to assist faith-based and community organizations in delivering social services and strengthening their existing partnerships with the local One-Stop Career Center system, while providing additional points of entry for customers into that system.

These 2002 grants embodied the Department's principal strategy for implementing the Executive Order: creating new avenues through which qualified organizations could participate more fully under the Workforce Investment Act (WIA), while applying their particular strengths and assets in providing services to our customers. These solicitations also were derived from an ETA-CFBCI mutual premise that the involvement of faith-based and community organizations can both complement and supplement the efforts of local workforce investment systems in being accessible to and serving the training, job and career-support needs of many of our citizens.

Many faith-based and community organizations offer unique services and support networks that can contribute to our mutual system-building endeavors; are trusted institutions within our poorest neighborhoods; and are home to a large number of volunteers who bring not only the transformational power of personal relationships to the provision of social service, but also a sustained allegiance to the well-being and self-sufficiency of the participants they serve. Through their daily work and specific programs, these organizations strive to achieve some common purposes shared with government - reduction of welfare dependency, attainment of occupational skills, and entry and retention of all our citizens in good-paying jobs.

The President's Management Agenda direct the Department of Labor Center for Faith-Based and Community Initiatives to evaluate and examine the impact and outcomes of departmental programs that include faith-based and community non-profit organizations (FBCO). DOL CFBCI intends to use this data to examine the impact that receiving and managing federal grants has on grassroots,

faith-based and community 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.

Faith-based and community organizations benefit from having equal access to federal funds. DOL CFBCI intends to use this data to examine the extent to which faith-based and community organizations are able to use the Federal funds (awarded through the ETA Grants for Grassroots Organizations from 2002 to 2005) as leverage to expand their organizations to qualify for additional federal, state, local or private funding.

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 burdens.

The collection of information does not involve the use of any technological collection techniques. The survey device can be submitted to DOL via email or fax.

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.

DOL OSEC/CFBCI did not exist prior to 2002. The grant program, ETA Grants for Grassroots Organizations, began as a pilot program in 2002, so there is no similar information 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 survey will be administered via email and telephone. The survey is limited to 6 questions so as to limit the burden. The respondent may use email, phone or fax to submit their answers.

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.

Failure to conduct this research would result in an inability of the Department of Labor to understand the full impacts and benefits of its grants programs, particularly those that target smaller faith-based and community organizations (FBCOs). This would limit the Department's ability to improve the design of grants programs and would leave in place a significant gap in the knowledge of the Federal government regarding the impacts and benefits of receiving Federal grants upon FBCOs.

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.

None.

8. If applicable, provide a copy and identify the data 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 periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), the Department published a notice in the Federal Register on August 30, 2006. (Page 51637-51638, FRN: August 30, 2006 (Volume 71, Number 168)

<http://frwebgate4.access.gpo.gov/cgi-bin/waisgate.cgi?WAISdocID=5068321522+2+0+0&WAIAction=retrieve>) No comments were received.

CFBCI consulted with staff members and previous and current grantees to help assess the burden.

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

None.

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

N/A

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. 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.

N/A

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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- 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.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

Burden: One-time survey

30 minutes per each organization.

128+ organizations (plus, future grantees)

3,840 minutes total (64 hours)

Estimate for 2006 = 60 organizations

CFBCI calculated the burden by consulting a sample of previous and current grantees, as well as members of the CFBCI staff. Three previous and current grantees completed the survey. The time of completion varied between 20 minutes and 35 minutes. From this, CFBCI estimated an average burden of 30 minutes per survey.

13. Provide an estimate 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 Items 12 and 14).

- The cost estimate 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 estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

N/A

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Costs to the Federal government will be minimal. The survey will be delivered primarily electronically. A small number of staff/intern hours will be used to dispatch the survey and to maximize response. Interns will be used to perform the simple tabulation of results. Ten staff hours will be used to draft a report analyzing findings for grant-making offices within the Department of Labor and the White House Office of Faith-Based and Community Initiatives. Total costs will involve an estimated twenty paid staff hours and forty unpaid intern hours—estimated at a total value of 20 hours X \$50 per hour for \$1000 in annualized costs.

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

New, one-time collection of information.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Research will begin immediately upon OMB clearance.

Clearance + 15 days: Surveys will be sent to grantees via e mail.

Clearance + 30 days: Grantees will be sent reminder e mail.

Clearance + 45 days: Grantees that have not yet responded will be reminded via phone call.

Clearance + 60 days: Interns will begin aggregating data received.

Clearance + 75 days: CFBCI staff will analyze results

Clearance + 90 days: CFBCI will submit 3-5 page report on data for departmental clearance.

Clearance + 120 days: Final report will be delivered to White House Office of Faith-Based and Community Initiatives and to DOL grant making agencies.

White House Office of Faith-Based and Community Initiatives will determine if results merit further promulgation.

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.

N/A

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

N/A

B. Collection of Information Employment Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

This collection of information does not employ statistical methods.

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.
2. Describe the procedures for the collection of information including:
 - Statistical methodology for stratification and sample selection,
 - Estimation procedure,
 - Degree of accuracy needed for the purpose described in the justification,
 - Unusual problems requiring specialized sampling procedures, and
 - Any use of periodic (less frequently than annual) data collection cycles to reduce burden.
3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.
4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.
5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.