Supporting Statement for Paperwork Reduction Act Submission for the
National Earthquake Hazards Reduction Program (NEHRP)
Annual Assistance Announcement
OMB Control Number 1028-0051
Current Expiration Date: 1/31/07

Terms of Clearance

"Upon the DOI's next request to extend this collection, the Agency shall describe the outcome of efforts currently underway to accommodate the electronic submission of data and to what extent those efforts have reduced burden, particularly the number of copies required from grantees." These terms are addressed under items 3 and 12.

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.

The Earthquake Hazards Reduction Act of 1977, Public Law 95-124 (42 USC 7701 *et. seq.*), most recently amended as Public Law 108-360, authorizes the U. S. Geological Survey (USGS) to conduct an annual program of assistance. The purpose of the program is to support research in earthquake hazards and the physics of earthquakes and earthquake occurrence in order to provide earth science data and information essential to mitigate earthquake losses. The assistance application instructions, specific objectives, and reporting requirements are identified in an annual program announcement. The application consists of the Standard Form 424, assurance, a budget, and technical narrative, submitted through Grants.gov and with one original and one paper copy. Reporting requirements are a final technical report and a final financial report (SF 269). These reports are the minimum requirements of OMB Circulars A-102 and A-110. The maximum length of the application is 25 pages. The final technical reports are published in their entirety (maximum of 10 MB, including figures) on the External Research Support office's website, part of the USGS website. The final technical report requirement was created in response to the requirement in Public Law 95-124, Section 2, paragraph (8), which states: "Improved mechanisms are needed to translate existing information and research findings into reasonable and usable specifications, criteria, and practices so that individuals, organizations, and governmental units may make informed decisions and take appropriate actions."

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. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

The information requested by the annual announcement is used to determine the eligibility of the applicants and as the basis for approval or disapproval of the proposed research. The Standard

Form 424 is used as the cover sheet for all applications. The Standard Assurances require the recipient to participate in and support a variety of Federal programs. The Financial Estimate, Budget Breakdown, and Negotiated Indirect Cost Rate Agreement are required by OMB Circulars A-110 and A-21 and are needed for agency projection of funding requirements, and to determine the allowability of costs and conformance with OMB cost principles. The technical narrative is needed for the applicant to describe the proposed research and management plan, and for the peer reviewers to evaluate the research against established NEHRP criteria. The application's uniform appearance and assembly are needed to minimize the time required by the agency to determine applicant eligibility and for review and oversight. Reporting requirements are the minimum required by the OMB Circulars. Final technical reports are needed for technical monitoring of the projects to assure consistency with the objectives of the program's legislation. The technical reports have no specific format. Re-prints of peer-reviewed articles submitted for publication in journals are accepted as final technical reports. The final financial reports (SF269A) are needed to assure that funds are expended in accordance with the approved budget and OMB cost principles (OMB Circular A110).

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 [and specifically how this collection meets GPEA requirements].

Previously applicants were asked to submit 1 original and 10 copies of the narrative and grant recipients were asked to submit 1 unbound original and 5 bound copies of final technical reports and submit electronic to gd-erp-coordinator@usgs.gov. In response to the Terms of Clearance, the required narrative can now be prepared electronically for personal data storage and copied into the on-line application through Grants.gov (http://www.grants.gov). Final technical reports will be submitted electronically only, to gd-erp-coordinator@usgs.gov. These changes will result in 100 percent electronic submission. These changes have resulted in a 2 hour reduction in the burden for applications (further described in item 12).

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.

The information is used solely for the purpose of this program and is not duplicated. The subject matter of each application and report are unique to each applicant each year. There is no similar information available which could be used or modified for this purpose.

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.

Applicants generally include approximately 70 small businesses per year. Approximately 35 small businesses submit final technical reports each year. The information requested is the minimum required by law.

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.

Funding for the Earthquake Hazards Program is appropriated on a fiscal year basis as part of the Survey's annual appropriation. The program priorities may change each year as directed by Congress. Consequently, the issuance of the announcement and submission of applications must be scheduled no less frequently than annually.

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

(a) requiring respondents to report information to the agency more often than quarterly.
Not applicable in this collection.

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Not applicable in this collection.

(c) requiring respondents to submit more than an original and two copies of any document.

Not applicable in this collection.

(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years.

Not applicable in this collection.

(e) 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.

Not applicable in this collection.

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB.

There are no special circumstances with respect to 5 CFR 1320.5(d)(2)(v) through (viii) as the collection is not a statistical survey and does not use statistical data classification.

(g) 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.

This collection does not include a pledge of confidentiality not supported by statute or regulation.

(h) requiring respondents to submit proprietary trade secrets 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.

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

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 in response to the PRA statement associated with the collection over the past 3 years] 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.] 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.

Copy of Federal Register 60-day notice attached, (November 1, 2006, Volume 71, Number 211, pages 64290-64291). No responses were received. Prior to the comment period, the Earthquake Hazards Program Project Officer consulted with a few previous Principal Investigators (noted below) on the burden that the grant application and reporting imposes. The burden estimate in section A.12 reflects the experience of past and potential respondents.

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

Not applicable. No payments or gifts.

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

No assurance of confidentiality is provided.

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.

No sensitive questions are asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

(a) 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.

(b) 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.

(c) 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.

Approximately 250 respondents will likely each submit one proposal per year and approximately 120 grants are awarded per year, based on past averages and future projections for this activity. The estimated annual burden is 250 proposals times 30 hours per proposal and 120 grants times 40 hours per report for a total of 12,300 burden hours. Based on these figures, the total cost to the applicants to prepare the applications is $300,000, based on an average labor rate of $40 per hour for the people involved. Of the 250 applications received, approximately 120 will be selected for awards. These 120 recipients will each be required to submit a final technical report. It is estimated that it will take approximately 40 hours to prepare the report at an average cost of $40 per hour for a total of $192,000 for reporting. Application plus reporting costs are estimated at $492,000 per year.

It should be noted that the previous OMB Terms of Clearance dealt with future electronic submissions. The current use of electronic submission through Grants.gov and the elimination of required paper copies results in a reduction of the burden by an estimated 2 hours per application. The use of electronic submissions (to gd-erp-coordinator@usgs.gov) for final technical reports has replaced the requirement for paper copies (described further in item 3).

13. Provide an estimate of the total annual [non-hour] 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).

(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) 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 [including filing fees paid]. 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.

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden 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.

(c) 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.

Not applicable. No additional costs.

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.

The total additional cost to the Federal Government is approximately $50,000 for holding the annual proposal review panel meeting. The cost of the panel meeting includes only transportation and per diem for peer reviewers and USGS staff and room rental; no salaries or stipends are paid to reviewers.

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

Total burden hours adjusted downward because of Grants.gov electronic submissions and fewer paper copies required from applicants.

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.

This is an on-going information collection without an ending date. No statistical analysis, tabulation, or publication is planned for this information.

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.

Not applicable.

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

Not applicable. No exceptions to the certification are being made.