

Public Burden

The OMB information requested, on number of hours (burden), is impossible to compile on a CFDA by CFDA basis. We cannot distribute the hours by CFDA category with any reasonable accuracy. All the money for eight of the programs comes out of one pot. We may run a competition under one CFDA one year in five. In some cases, we may not run any. Others we may run every year. However, we change the distribution of funds from year to year to respond to needs in the field. This means we change which competition areas (i.e., CFDA) we may run in any given year. We can't project out any more than a year in some cases. As we shift money around, we change the impact on burden. We don't know how our money will be distributed in two years, so we can't estimate burden by CFDA. We can estimate with reasonable accuracy across the CFDA's as we know how much money we will compete and can translate that into number of applications which we can convert into burden. We cannot do this CFDA by CFDA with reasonable accuracy. It is that simple for us.

A good example of the problem in calculating these figures is as follows: 84.129 and 84.263 are funded out of the same pot of money (as are several other grant areas). We have no specific plans to fund anything in 84.263, but that could easily change for a given year. If we do fund grants in 84.263, we would fund fewer in 84.129, so the info on number of applications (and therefore burden) would change accordingly. We simply do not know at this point. Also, we get a VERY occasional application from an individual. we never know what category we might get on in. How do we report the number of grants from individual? For any given category, we are unlikely to get any, but we will probably get one or two somewhere along the line.

I recommend providing an aggregate figure across all CFDA's. The figures we can provide will be reasonably accurate. Breaking them down by CFDA will be highly inaccurate.