

THE SUPPORTING STATEMENT

- 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.

This request is for a revision to the current information collection (Uniform Project Description (UPD), 0970-0139) that is to add statutorily mandated programs and add content to the UPD. This complete list of programs is at Attachment A.

The Administration for Children and Families (ACF) is requesting an extension of the Uniform Project Description (UPD) (OMB Control number 0970-0139). The UPD is available for use on an optional basis by program offices to solicit the project description information for project grants and cooperative agreements. This approach consists of a menu of narratives that the program office can select as required for a specific project or cooperative agreement announcement. Text options selected for use in a given program announcement define the required project description portion to the grant applicant. The ability to pick and choose standard language that's appropriate for any given program announcement reduces burden associated with application preparation by eliminating irrelevant portions of the application for a given announcement. In addition, it provides consistency in the application review process.

UPD content is being revised by adding four text options for LETTER OF CONTENT, TABLE OF CONTENTS, LOGIC MODEL and ELIGIBILITY CERTIFICATION. The latter text option improves on a portion of the existing text option ORGANIZATIONAL PROFILES which is modified. Revisions to the UPD are annotated at Attachment B and the final UPD, with internal instructions at Attachment C.

Much of the information required in applications for project grants and cooperative agreements is required by HHS Uniform Administration Requirements for Grants and Cooperative Agreements at the following citations: 45 CFR Part 74 and 45 CFR Part 92, and other regulations, promulgated by A-110 and A-102 respectively. Copies of the relevant OMB Circulars can be found at Attachments D and E, respectively.

- 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.**

Administration for Children and Families (ACF) Program Offices, grants management officials, and expert non-Federal and Federal panel reviewers use the collected information provided through grant applications to select and award discretionary grants. Program Offices use the information to ensure that Congress's intent of authorizing legislation will be implemented through any funded grant project and that applicant entities are eligible to receive grant funds.

Expert non-Federal and Federal objective review panelists score the information provided in applications as they evaluate applications in the context of the program announcements' published criteria to ensure that the best proposed projects are funded.

Grants management officials use the information collected to ensure appropriate Federal stewardship of Federal grant funds. This includes review of audits, CPA certifications that appropriate financial systems are in place and that proposed budgeted project costs are allowable, allocable and reasonable.

- 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.

Electronic submission of grant applications is strongly encouraged but not required. Currently about 40 percent of ACF applicants use Grants.gov for searching for a project grant and submission of an application. Estimates are for 80 to 90 percent of ACF applicants to use Grants.gov within five years. This will reduce burden and make the process more efficient by eliminating delays inherent in a paper-based manual process.

The process involves four functions. First, an interested party would use the FIND function to identify a particular public assistance funding opportunity. Second, the application package would be downloaded over the Internet. Next the applicant would prepare the application package offline and third, submit the application package electronically. Last, Grants.gov allows for the applicant to track the status of the submitted application.

Security is provided by E-Authentication which is a system that provides the trusted and secure gateway to support the 24 E-government initiatives, eliminating the need for each initiative to establish electronic identity. The gateway allows citizens to conduct transactions with the government through a single sign-on and provide a uniform process.

Grants.gov uses E-authentication Credential Providers for this purpose. Once an Authorized Organizational Representative (AOR) is registered with the Credential Provider, and registers with Grants.gov as an AOR, the organization's registered E-Biz Point of Contact receives a notification and can authorize the AOR to submit grant applications through Grants.gov on behalf of the organization.

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.

This is not applicable. Competitive applications are time and applicant specific. The Unified Project Description provides a common way in which this information is collected to avoid duplicative efforts.

- 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 needed to comply with program requirements. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate these unique program criteria.

- 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 reduce burden.**

If this information is not collected, adequate data will not be available to evaluate the proposed projects and select the appropriate grantees. Reduced frequency is not possible as the annual frequency to solicit applications and make grant awards coincides with the annual appropriation of funds by Congress. Furthermore, not collecting applications for competitive projects would be inconsistent with Departmental policy and other authorities.

The consequence of requiring OMB review of individual program announcements would be to place additional stress on an already constrained annual grant cycle. The effect would be a delay in publishing program announcements and creating

a need to shorten the time applicants have to submit announcements. Time for competitive review would also need to be compressed to allow for the award of grants by September 15 of each year. These consequences of non-approval are evidenced by the ACF's circumstances prior to approval of the UPD. With the addition of new programs, these consequences will become more pronounced.

Applications are required for project grants and cooperative agreements as prescribed by regulations and other authorities.

It's fundamental to the competitive award process.

7. **Explain any special circumstances that require the collection to be conducted in a manner:**
 - o requiring respondents to report information to the agency more often than quarterly;
 - o requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - o requiring respondents to submit more than an original and two copies of any document;
 - o requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - o 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;
 - o requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - o 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

- o 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.

Proprietary trade secrets, or other confidential information are addressed at element 10 with excerpts from the HHS Grants Policy Statement.

There are no special circumstances.

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 periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

A notice was placed in the Federal Register on January 17,

2007, (Volume 72, Number 10) page number 1998, soliciting comments to the ACF. No comments were received.

The active pool of ACF discretionary grantees includes approximately 3,000 educational and private nonprofit institutions; and State, Local or Tribal Governments. Through routine inquiry, pre-award, post-award and post grant close-out phases of grant administration, dialogue routinely occur between applicants and grantees. The substance and detail of the information collected is the focus of attention since it is the basis for award.

Because the grant establishes a relationship between ACF and the grantee, consultation with the community is a necessary and ongoing process.

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

There are no payments or gifts to applicants. The only remuneration is the grant payment dispersed to those entities parties awarded a grant.

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

Assurances of confidentiality necessary to inform the applicant of project grants and cooperative agreements is located in two specific places, Grants.gov and HHS policy which is incorporated in the HHS Grants Policy Statement (GPS). The following are excerpts from the relevant portions of those two sources:

Grants.gov

The Grants.gov privacy policy states that they “protect the rights of individual users under sections 552a of title 5, United States Code commonly referred to as the ‘Privacy Act,’ and other laws relevant to the protection of the privacy of an individual.”

Grants.gov does not require a user to submit information when browsing the site (using the FIND function); however, identifying information is collected from Authorized Organization Representatives (AOR) when representing their organization. This is done in compliance with the Privacy Act.

HHS Grants Policy Statement

ACF displays a link to the GPS on the ACF / ACF Grants Opportunities / Forms web page. Sections from the GPS appear below that address proprietary and confidential information:

Use of Application Information

Applicants are discouraged from submitting information considered proprietary unless it is deemed essential for proper evaluation of the application. However, if the application contains information that the applicant organization considers to be trade secrets, information that is commercial or financial, or information that is privileged or confidential, the pages containing that information should be identified as specified in the funding opportunity announcement or application instructions.

When non-Federal reviewers are used, the funding opportunity announcement or application instructions will specify that applicants have the option of omitting specific salary rates or amounts for individuals specified in the application budget and, if required by the OPDIV, Social Security numbers for individuals. For hard-

copy applications, this can be accomplished by including the information in the original, but omitting it from the application copies. The copies may include summary salary information. For electronic applications, the information must be supplied to the OPDIV as part of the submission. The funding opportunity announcement will specify if the applicant should indicate, in the application or in a separate form, whether it wants to use that option. If the detailed information is an integral part of the application, the OPDIV will ensure that the information is not shared with reviewers.

The OPDIV will protect the information contained in an application from unauthorized disclosure, consistent with the need for objective review of the application and the requirements of the Freedom of Information Act and the Privacy Act. However, if a grant is awarded as a result of or in connection with an application, the Federal government has the right to use or disclose the information to the extent authorized by law. Post-award considerations concerning release of information and access to research data are addressed in Part II of this policy statement.

Privacy Act

The Privacy Act of 1974, 5 U.S.C. 552a, and its implementing regulations (45 CFR part 5b) provide certain safeguards for information about individuals maintained in a system of records (i.e., information may be retrieved by the individual's name or other identifying information). These safeguards include the rights of individuals to determine what information about them is maintained in Federal agencies' files (hard copy or electronic) and how it is used; to have access to such records; and to correct, amend, or request deletion of information in their records that is inaccurate, irrelevant, or outdated.

Records maintained by OPDIVs with respect to grant applications, grant awards, and the administration of grants may be subject to the provisions of the Privacy Act. For example, OPDIVs that maintain or access any such records by name of an individual, such as by the name of the PI/PD, are subject to the Privacy Act.

Parties other than PIs/PDs may request the release of Privacy Act records. Such requests are processed in the same manner as FOIA requests. For example, information requested by co-investigators in grant applications is released to them only when required under FOIA because they have no right of access under the Privacy Act. When releasing information about an individual to a party other than that individual, OPDIVs will balance the individual's right to privacy with the public's right to know as provided by the FOIA.

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.

Questions of a sensitive nature are not asked. Please refer to the UPD narratives.

12. Provide estimates of the hour burden of the collection of information. The statements should:
 - o Indicate the number of respondents, frequency of the 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.
 - o 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.
 - o Provide estimates of annualized cost to the respondents (other than individuals and households) for hour burdens for collection 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.

This request is for authorization to use the UPD for 44 statutorily mandated ACF programs for project grants and cooperative agreements.

The ACF estimates 9,163 applications will be submitted annually. On average the burden hours per response is 40 hours. Frequency is once when the applications is solicited. Therefore, the total hourly burden annually is expected to be 366,520 hours. Hourly burden for the SF 424 series of forms is covered under a separate OMB information collection clearance.

Total annualized dollar cost based on hourly burden, based on \$35 per hour burdened, is \$12,828,200 (\$35 X 366,520 hours).

Instrument	Number or Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours
UPD	9,163	1	40	366,520

A copy of programs with their associated burden can be found at Attachment A.

13. Provide an estimate of the 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)

o 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 rates(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collection information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

o 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.

o Generally, estimates should not include purchases of equipment, or services made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, or (3) for reasons other than to provide information or keep records for the government.

Not applicable. Applicants for project grants and cooperative agreements develop applications using current employees who have an in-depth knowledge of the organization's capabilities and finances. This applies to total capital and start-up; and total operation and maintenance and purchase of services costs. In summary, there are no direct (incremental) monetary costs to respondents other than their time to prepare the applications. Information on these monetization of those costs are provided above under A.12

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 12, 13, and 14 in a single table.

It is estimated that, on average, there are 20 hours of labor on the part of government employees to develop the request package and Federal Register notices would occur if it weren't for approval of the UPD. The average annual number of applications is 9,163 which equates to 183,260 hours of staff time. Based on an average of \$50 per hour, in monetary terms this equates to \$7,330,000. Therefore, approval of this request represents a savings to the Federal Government.

The competitive review is performed by outside reviewers which incur a cost with or without the UPD.

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

There are adjustments resulting from revisions in estimating.

Program changes have occurred because of the addition of programs and revisions to UPD content.

16. For collections of information whose results are planned to 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.

Information in grant applications will not be published. Making information contained in a grant application available to the general public is prohibited. The disclosure of information in grant applications is closely regulated by and subject to The Freedom of Information Act (FOIA) and The Privacy Act of 1974.

The most significant exemptions from disclosure of grant application information are 4 and 5 in the FOIA. Exemption 4 protects from public disclosure two types of information: trade secrets and confidential commercial, or financial information obtained that is privileged or confidential. Exemption 5 applies to internal government documents and permits the withholding of internal recommendations, advisory opinions, and materials used for evaluation.

- 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.**

There will be no exceptions to the practice of displaying the expiration date. The display of the expiration date for OMB approval on a program narrative will never be considered inappropriate.

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

This is no longer applicable.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used since there is no attempt

to draw inferences about a population. The applications received are the universe.