

## JUSTIFICATION FOR CHANGE

### U.S. Department of Labor Generic Solicitation for Grant Applications (SGA) OMB No. 1205-0458

#### **Summary:**

This information collection request (ICR) was originally conceptualized and approved by the Office of Management and Budget as a “generic” ICR; however, was not set-up in ROCIS as a generic collection plan. This request is to simply change this OMB number from a standard collection to a generic collection plan within ROCIS. Materially and substantively, the collection remains the same.

This change is necessary because currently the department must submit a non-substantive no material change request for each SGA which does not result in the debiting of the total approved hours for this collection nor does it allow information collections (ICs) to be added. Instead, each SGA is submitted as a separate change action to the OMB number. Changing this OMB number from a standard approval to a generic approval would be more efficient allowing for better tracking of SGAs submitted under this information collection plan.,

#### **Change in Burden Hours:**

The department is requesting a downward adjustment of 4,312 hours to return to OMB number to the original baseline of hours as approved by OMB on 09/08/2006. The additional 4,312 hours were added as a result of submitting change requests to add SGAs (in inverse of what should occur for a generic collection). The NOA stated 119,312 hours; however, item 12 of the supporting statements requested 115,000 hours.

#### **Request to Change Terms:**

The department requests that OMB revise the existing terms of clearance provided by OMB on 09/08/2006 (see ICR Reference Number 200603-1205-002) in the following manner:

1. The old system of submitting the OMB Form 83-C to request non-substantive no material changes to an approved collection of information is outdated. Instead, the terms should reference the submission process under the generic collection plan protocol.
2. Once approved as a generic collection plan in ROCIS, each submission will be inventoried as an IC under the generic; effectively eliminating the need for submitting an annual list of items cleared under this generic to OMB.
3. The current OMB-approved supporting statement indicates that the department will submit SGAs under this generic plan 24 hours before publication in the Federal Register. This timing does not allow for sufficient review either by the department not OMB; therefore, the department requests that OMB require these submissions no later than 15 days prior to the targeted date of publication in the Federal Register.