

OMB Forms Justification Package
Martin Luther King, Jr. Day of Service Grants
Application Instructions

PART A: JUSTIFICATION

- A1. 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 purpose of this request is to seek approval for the Martin Luther King, Jr. Day of Service Grant Application Instructions. Through Congressional appropriations, the Martin Luther King, Jr. Day of Service Grants competition was established to provide grants to organizations to plan and carry out projects that bring Americans together to serve in their communities in observation of Martin Luther King, Jr. Day.

In order to award grants to nonprofit charitable organizations, such as public charities, community organizations (faith-based and secular), private foundations, and higher education schools under the Martin Luther King, Jr. Day of Service Grant competition, the Corporation for National and Community Service (the Corporation) must issue grant application instructions. The authority for this funding was first given to the Corporation in Public Law 105-354, the National and Community Service Act of 1990.

The Corporation plans to use a one stage process for collecting the grant competition information. For those submitting an application, technical assistance will be provided to help them through the application process. The information collected through this method will constitute the information used to make decisions for awarding grants to eligible parties.

- A2. Indicate how, by whom, and for what purposes 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.**

The information collected constitutes a submission to the Corporation for grant funding. The application instructions have been designed to conform to the congressional requirements, provide an effective framework for applicants to explain their proposed program, and obtain the information Corporation staff will need in making informed funding decisions. The Corporation will evaluate the information submitted through the application and funding decisions will be made through the Corporation's grant review and selection process. Applications will be subject to an internal staff review and national experts may be consulted during the review process. Based on these analyses, the Corporation's Chief Executive Officer and Board of Directors will decide which applications to support with grant funds. The Corporation will also use the information to identify areas in which a grant recipient may need training and technical assistance.

A3. 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.

The Corporation has developed an electronic system, eGrants, to comply with the requirements of Public Law 106-107.

A4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There are no other sources of information by which the Corporation can meet the purpose described in A2.

A5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.

This collection of information does not impact small businesses since they are not eligible to apply for the grant. Economic burden to other small entities is limited to the cost of staff time to develop and submit the concept paper and full application. This is minimized to the degree possible by asking only for the information absolutely necessary to make responsible grant approval decisions.

A6. 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 obstacle to reducing burden.

The Corporation would be unable to fulfill its legal obligation of providing grant funding for Engaging Persons with Disabilities in National and Community Service Grants if this information were not collected. Appropriations for Engaging Persons with Disabilities in National and Community Service Grants have been made for FY2005 and it is likely that appropriations will continue to be requested in future years. This information will be collected annually, provided funding for Engaging Persons with Disabilities in National and Community Service is approved by the Congress.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that (a) required respondents to report information to the agency more often than quarterly; (b) requires respondents to prepare written response to a collection of information in fewer than 30 days after receipt of it; (c) requires respondents to submit more than an original and two copies of any

document; (d) requires respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax record for more than three years; (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; (f) requires the use of a statistical data classification that has not been reviewed and approved by OMB; (g) 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 (h) requires 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.

There are no special circumstances that will require information to be collected in a manner that is not consistent with the requirements outlined above.

A8. 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 the notice and describe actions taken by the agency in response to the comments.

The Federal Register notices were published and no comments were received.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Information provided by respondents is subject to the Freedom of Information Act and the Privacy Act. No specific assurance of confidentiality is provided.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other behaviors that are commonly considered private.

The proposed data collection does not include any questions of a sensitive nature.

A12. 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. 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 expected 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 line 13 of OMB Form 83-1. (c) provide estimates of annualized costs 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.

The total hour burden is estimated at 800 hours. The Corporation expects no more than 80 respondents. The frequency of response will not be greater than once per year and should average 10 hours of effort per respondent for the full application submission. There is no estimated annual hour burden outside of the customary and usual business practices.

Form	Respondents	Estimated Number of Respondents	Estimated Burden per Respondent (Hours)	Total Burden Estimate (hours)
Application	Nonprofit organizations (public charities, community organizations, private foundations, and Higher education schools)	80	10 hours	800 hours

A13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burdens shown in Items 12 and 14.

There is no actual annual cost burden to respondents resulting from this information collection activity. However, based on the Independent sector value for a volunteer hour, the total estimated cost would be \$15,608.

A14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Corporation is a grant-making agency, and a certain portion of its administrative budget is tied to creating opportunities for interested and eligible applicants to submit information on approved collection instruments and evaluating the information in order to approve grants. These costs relate to receiving and evaluating grant applications, making award recommendations based on information collected and the outcome of the evaluation process, and issuing grant awards to successful applicants.

Evaluation and Recommendation of Grant Applications:

Program Staff Costs:	\$30,000
Issuing of Grant Awards:	\$10,000
<u>Field Review Costs:</u>	<u>\$25,000</u>
Total:	\$65,000

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

There were no changes or adjustments to Item 14 of OMB Form 83-I, however we have a new cost estimate in item 13, because the volunteer hour value has gone up.

A16. 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.

The collection of information resulting from the grant competition will not be published.

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Corporation is not seeking this approval. The expiration date will be displayed on the application instructions.

A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-1.

There are no exceptions to the certification statement in Item 19.