

Supporting Statement
Data Collection Form for Application for Federal Assistance
SF- 424 Short

We are renewing an approved data collection (OMB No. 4040-0003), the SF-424 Short Form (Short). We are requesting a three-year clearance of this form. This form is utilized by Federal grant making agencies and is used to create grant application packages for individual applicants. The collection expires on July 31, 2008 (April 13, 2007 Volume 72, Number 71, page 18657).

A proposed change to the Short form is deletion of a data field that collects the Social Security Number (SSN). The SSN field is an optional field. The current collection pre-fills the first five digits with "xxx-xx" and only collects the last four digits of the SSN. At OMB's request, we reviewed the usefulness of collection of a portion of the SSN. We polled the agencies that use the Short form and determined that the partial SSN is not useful for processing the Short form by the agencies. This change ensures that no portion of the SSN will be collected as part of the electronic grant application process.

A. Justification

1. Need and Legal Basis

On an annual basis, the Federal government commits nearly twenty percent of the Federal budget, or approximately \$400 billion, to State and Local governments, Tribal organizations, education and research institutions, non-profit organizations, public housing authorities, commercial organizations and individuals through the award of Federal grants. There are 26 Federal grant-making agencies and other Federal grant-making organizations with over 900 grant programs. More than half of these Federal agencies and grant-making organizations have Discretionary grant programs authorized by legislation covering a broad range of diverse subject matter. To obtain Federal grants funds, applicant organizations must apply to the Federal agency or organization responsible for administering the grant program.

The Federal Grant and Cooperative Agreement Act of 1977 (31 USC 6301-6308) gives agencies the authority to select the appropriate award instrument within the limits of their program legislation to support or stimulate recipient activity. Public Law (PL) 106-107, the Federal Financial Assistance Management Improvement Act of 1999, was enacted to improve the effectiveness and performance of Federal financial assistance programs, simplify Federal financial assistance application and reporting requirements, and improve the delivery of services to the public. The issuance of the President's Management Agenda in 2002 called for "agencies to allow applicants for Federal grants to apply for, and ultimately manage, grant funds online through a common web site, simplifying grants management and eliminating redundancies..."

The proposed information collection, the Short form assists agencies that award grant programs to organizations to implement the Office of Management and Budget (OMB) direction to use the Grants.gov Apply mechanism (<http://www.whitehouse.gov/omb/memoranda/fy04/m04-05.html>). In its memorandum to agencies, OMB established Grants.gov as the Federal government's single, online portal for any person, business, or State, Local and Tribal government to find and apply for Federal grants, regardless of type.

2. Information Users

The SF-424 (Short) provides the Federal grant-making agencies a simplified alternative to the Standard Form 424 data set and form. Agencies may use the SF-424 (Short) for grant programs not required to collect all the data that is required on the SF-424 core data set and form.

In addition, this information collection request includes two SF-424 supplemental forms, the Key Contacts form and the Project Abstract form. The Key Contacts form is an optional form that the agencies may include in the application package to collect additional key contact or point of contact information. The Project Abstract form is also an optional form that provides the mechanism for the applicant to attach a file that contains an abstract of the project, in a format specified by the agency.

Federal agencies will not be required to use the forms or to collect all of the information included on the proposed forms. The agency will identify the forms and the form sections that must be completed by applicants through instructions that will accompany the forms. Agencies will implement processes for reviewing the applications and awarding grant funds. These processes are reflected in agencies' policies and procedures documents. Agencies will also maintain and store application forms and data in accordance with their policies and practices.

3. Improved Information Technology

The Grants.gov Apply mechanism (<http://www.grants.gov/Apply>), deployed in October 2003, allows applicants to electronically apply for Federal grants. In its January 7, 2004 memorandum, OMB directed grant-making agencies to use the Grants.gov Apply mechanism (<http://www.whitehouse.gov/omb/memoranda/fy04/m04-05.html>). Information on the Short form is entered into fillable forms and submitted electronically through the Grants.gov Apply portal. Applicants can complete application documents that they download from Grants.gov and submit them based on agency policies and instructions. Agency policies and instructions include detailed submission guidance such as due dates, eligibility, information requirements, supporting documentation, etc. Upon receipt of the application, Grants.gov sends an electronic acknowledgement to the applicant that the submission was received with the date and time of receipt. In addition, Grants.gov delivers the application to the agency.

4. Duplication of Similar Information

Development of the Short form and data set reduced duplication of similar or identical forms and data sets across Federal agencies. This information collection also implemented streamlining and simplification provisions of PL 106-107 and provides support for the President's Management Agenda to allow applicants for Federal grants to apply for grant funds online. A cross-agency work group developed the Short form and data set that serves as a common application cover page for individual grant programs.

5. Small Businesses

Applicants use the Short form and data set to apply for grants to any of the Federal grant-making agencies that award grants to individuals, rather than using each agency's grant application cover page. The applicant's burden is lessened through a reduction in labor costs associated with preparing Federal grant applications and electronic submission of applications will eliminate postage and copying costs.

6. Less Frequent Collection

The Short form replaced comparable information collected in various application forms and data sets by agencies' grant programs. It is intended that the agencies continue to look for additional opportunities for data standardization in these programs. A significant PL 106-107 grants streamlining and simplification opportunity was achieved by allowing applicants for Federal grants to apply for grants electronically online with the Short form.

7. Special Circumstances

The proposed collection of information is conducted in a manner that complies with relevant legislation authorizing Federal grants programs and OMB policies related to the administration of Federal grants (OMB Circulars A-102; 2 CFR, Part 215 (formerly A-110); 2 CFR 220 (formerly A-21); 2 CFR Part 230 (formerly A-122); 2 CFR Part 225 (formerly A-87); and guidelines of 5 CFR 1320.5(d)(2).

8. Federal Register Notice/Outside Consultation

On March 24, 2005, the Grants.gov Program Management Office, one of the 26 E-Government initiatives, managed by HHS, published the proposed SF-424 Short collection for public comment in the *Federal Register* (January 26, 2007 Volume 72, Number 17, page 3850).

The current collection expires on July 31, 2008 (April 13, 2007 Volume 72, Number 71, page 18657).

9. Payment/Gift to Respondents

Not applicable since there is no payment to respondents, other than remuneration of grantees.

10. Confidentiality

The grant-making agencies will maintain the authoritative copy of all application materials and data. Confidentiality of information will be consistent with OMB policies related to the administration of Federal grants as well as agency policies and practices for access to electronic and paper records. If application forms are submitted through the Grants.gov Apply mechanism, Grants.gov will maintain only transmission records pertaining to the files. Grants.gov will not maintain application materials and data.

The change to this form deleting the SSN enhances confidentiality. This change ensures that no portion of the SSN will be collected as part of the Grants.gov electronic grant application process. This change ensures the entire SSN will not be collected or stored.

11. Sensitive Questions

Not applicable since there are no sensitive questions.

12. Burden Estimate

Section A. Estimated Annualized Burden Hours to Respondents

By aggregating agency's burden estimates, an estimate of the total burden of the information collection was developed. Information gathered from the National Endowment for the Arts, National Endowment for the Humanities, the Department of the Interior, the Department of Health and Human Services, and the Department of State generated an estimate of the total burden. Collectively, these agencies receive 11,577 applications from individuals annually and estimate that it takes applicants 25minutes* on average to complete each application. Cumulatively, these organizations report the total burden to applicants to be 4,884 hours.

SF-424 Short Form Estimated Annualized Burden to Respondents

Agency	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response in Hours	Total Burden Hours
NEA	4130	1	4130	20/60	1377
NEH	2328	1	2328	30/60	1,164
DOI	148	2.81	416	18/60	125
HHS	3903	1	3903	30/60	1952
DOS	800	1	800	20/60	267
TOTAL	11,309		11,577		4,884

*The assignment of 25 minutes of burden per response was calculated as follows:
 4884 total hrs. x 60 minutes = 293,040 total minutes.
 293,040 / 11577 total responses = 25.31 minutes per response. 25.31 minutes was rounded to 25 minutes for average burden time per response.

Section B. Burden Cost

SF-424 Short Form Estimated Annualized Cost to Respondents

Agency	Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
NEA	Grant Writer	1,377	\$70	96,390
NEH	Grant Writer	1,164	\$70	81,480
DOI	Grant Writer	125	\$70	8,750
HHS	Grant Writer	1952	\$70	136,640
DOS	Grant Writer	267	\$70	18,690
TOTAL		4,884		\$341,950

13. Capital Costs

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the Short form.

14. Cost to the Federal Government

The primary sources of costs to the Federal government are related to staff hours associated with reviewing grant applications and the costs of receiving and maintaining records and systems. Each agency currently has existing personnel, systems and processes in place to receive and review their agency-specific grant

applications. Any additional cost for agency system development, maintenance and enhancements should not be attributed to use of the Short form; therefore, its use is not expected to alter annualized Federal costs.

Agency personnel time to review the form is averaged at 13 minutes per form. Agencies provided an estimate of personnel review time during the burden collection process. Based on 11,577 responses per year ($11,577 \times 13 \text{ minutes} = 150,501 \text{ minutes}$; $150,501/60 \text{ minutes} = 2,508 \text{ hours}$ estimated personnel time.

Grants administrative personnel generally are in the GS-9 through GS-15 range. Based on a step five average of these grades, an average hourly salary is \$42.76 per hour. ($42.76/60 \text{ minutes} = .713 \text{ per minute}$ and $.713 \times 13 \text{ minutes} = \9.27 per application.

Therefore, $11,577 \text{ annual applications} \times \$9.27 = \$107,318$ of estimated annual cost to the federal government to review the form.

15. Program or Burden Changes

This is a revision of a currently approved collection. The current burden estimates are based on a program change using current estimates provided by the agencies that reported.

16. Publication and Tabulation Dates

Not applicable since there are no publication plans.

17. Expiration Date

Three years from OMB approval.

18. Certification Statement

Not applicable since there are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed in this information collection.