

**SUPPORTING STATEMENT
2700-0047**

The NASA Inventory Report: Property Management and Control, Grants

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This collection is required to ensure proper accounting of Federal property provided under grants and cooperative agreements with institutions of higher education and other non-profit organizations, and to satisfy external requirements for internal control of property provided by NASA or acquired with NASA funds. Reporting and recordkeeping are prescribed in 14 CFR.Part 1260, Grants and Cooperative Agreements. Furthermore, collection constitutes NASA's implementation of those parts of OMB Circular A-110 deemed applicable to Agency awards; i.e., recordkeeping requirements for Government furnished property (GFP), equipment acquired by recipients, and an annual reporting requirement for GFP.

2. Indicate how, by whom, how frequently, and for what purpose the information will 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 is submitted by recipients to provide a tracking mechanism for property on an annual basis, at the end of the grant, or on the occurrence of certain events. This information is used by NASA to effectively maintain an appropriate internal control system for equipment and property provided or acquired under grants and cooperative agreements with institutions of higher education and other non-profit organizations, and to comply with statutory requirements, e.g., Chief Financial Officers Act) on the accountability of Federal funds.

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. Also describe any consideration of using information technology to reduce burden.

NASA encourages recipients to use the latest computer technology in preparing documentation. Also, NASA is participating in Federal efforts to extend the use of information technology to more Government processes via the Internet.

4. Describe efforts to identify duplication.

Property and equipment records are unique for each grant and cooperative agreement. There is no known duplication of information.

5. If the collection of information impacts small businesses or other small entities (Item five of form OMB 83-I, the Paperwork Reduction Act Submission form), describe any methods used to minimize burden.

There is little or no impact on small business.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Absence of information provided by grants and agreements would result in an inadequate internal control system, which would diminish accountability for items acquired with public funds.

7. Explain any special circumstances that would cause an information collection to be conducted in certain manners (as listed).

None

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 before submission to OMB.

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

None

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

The confidentiality of this data is governed by statutes, the Freedom of Information Act, and agreement provisions and special conditions.

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.

No sensitive questions are involved.

12. Provide estimates of the hour burden of the collection of information.

Number of respondents submitting property reports:	141
Total Annual Responses	302
Reporting Hours (2 per report)	604

Record keeping hours (8 per respondent)	<u>1128</u>
Total Annual Hours	1732

Our estimates are based upon actual data for the Inventory Reports due as of September 30, 2007. The annual report is due if the grantee has property, and negative reports are not required. We estimated that 50% of the respondents will submit electronically and assumed an average of 2 hours for each report and an additional 8 hours for record keeping for each respondent. While submitting electronically reduces the amount of time to submit the report, there is considerable work required to develop and produce the reports.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no cost burden to respondents or record keepers, as costs related to the collection of this information are reimbursed by the Federal Government.

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, and any other expense that would not have been incurred without this collection of information.

Estimated annual cost to NASA is \$196,661. This includes communication with grantees, receipt and processing of the reports, accounting system entry at NASA Center and Agency levels, input to Agency Financial Statements, problem resolution, grantee training, and policy development. Hours to accomplish these activities were estimated and labor was priced conservatively at an average of \$74 per hour, including fringe benefits and burden. As the reporting requirement was changed to exclude negative reports, thus decreasing the cost to the Government.

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

Greater use of information technology has reduced the amount of time needed for recordkeeping as it relates to this collection.

16. For collections of information intended for publication, outline plans for tabulation and publication.

Not applicable

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

Approval Expiration Date may be displayed.

18. Explain each exception to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-1.

Not applicable

B. Collections of Information Employing Statistical Methods

Not Applicable.