

## SUPPORTING STATEMENT

### Budget Detail Worksheet

#### Justification

1. **Necessity of Information**

The Budget Detail Worksheet is required to facilitate the preparation of the budget and budget narrative as authorized under 28 CFR parts 66 and 70. Potential grant partners must present all relevant information in their application package when applying for discretionary grants. The Budget Detail worksheet is currently being used for all discretionary programs including grants under the American Recovery and Reinvestment Act of 2009. An emergency request is being submitted because the Budget Detail Worksheet must be used to process these current grants and therefore cannot expire.
2. **Needs and Uses**

This information is used to perform a cost analysis of the budgetary data for discretionary grants. Cost analysis includes obtaining cost breakdowns, verifying cost data, evaluating specific elements of costs, and examining data to determine the necessity, reasonableness, allowability, allocability, and appropriateness of the proposed cost. This assessment is performed by our financial analysts who are knowledgeable in grant management and accounting principles.

All applicants applying for discretionary grants are required to provide detailed information pertaining to their budgetary expenditures. Through our past analysis, we were able to identify an unallowable cost during the preaward stage; thereby, reducing the possibility of question costs during the grant period. Additionally, the performance of the cost analysis provides us the assurance that the grant funds are expended for achieving the goals and objectives of the grant program.
3. **Use of Technology**

Currently, applicants submit application for Grant Awards through the agency's automated grants management system. The budget detail worksheet is submitted as an attachment as part of the Grants Management System.
4. **Efforts to Identify Duplication**

There is no duplicative effort based on the financial nature of this task.
5. **Impact on Small Businesses**

The collection of information does not have a significant economic impact on small businesses entities, as indicated on form 83-I, Box 5.
6. **Consequences of Less Frequent Collection**

If the information was not collected, the government would run the risk of funds being expended for unintended purposes and the risk of potential question costs would increase.

7. **Special Circumstances Influencing Collection**  
The collection of information is used to analyze the necessity, reasonableness, allowability, allocability, and appropriateness of proposed costs during the preaward stage. At times, additional justification or possible modification is needed to properly approve the budgetary items. Often, the response is required within a few days due of the time constraints imposed in executing federal awards. As a result of the American Recovery and Reinvestment Act of 2009 this form is also being used for grants related to this act.
8. **Federal Register Publication and Consultation**  
The collection of information is consistent with guidelines 5 CFR 1320.8(a). No consultation effort outside the agency has been done as this questionnaire deals with questions relating to the applicant's accounting system and financial capability. Publication of the Federal register notice soliciting comments from the public is pending submission of the approved package to the Office of Management and Budget. The form contains a minimum of questions for an applicant and provides OJP with needed information to pre-screen new applicants for financial responsibility in accordance with standards in OMB Circular A-110. This is an one-time questionnaire and assists OJP in pre-screening applicants to avoid high-risk situations and protect Federal funds.
9. **Payment or Gift to Respondents**  
No gifts or payment are made to respondents for completing this document.
10. **Assurance of Confidentiality**  
We do not assure confidentiality of the information collected as this is subject to the Freedom of Information Act.
11. **Justification for Sensitive Questions**  
There are no questions of a sensitive nature contained in the form.
12. **Estimate of Hour Burden**  
Estimated burden hours: 2500 respondents per year, @ 4 hours per respondent for an annual burden of 10,000. These respondents would submit the information only once for each discretionary grant application. In the past, we have averaged around 2500 discretionary grants per fiscal year. The average time to prepare the budget narrative is projected to be four (4) hours per application at an estimated staff cost of \$20 per hour. Therefore, the total is estimated at 10,000 burden hours @ (4 hrs. x 2500 respondents = 10,000 hrs. x \$20 = \$200,000) \$20 per hour equals \$200,000.  
  
This estimate is based on our professional knowledge, and experience in determining the average time for preparing the data. The above estimated burden hour also relates to the hours required for the American Recovery and Reinvestment Act of 2009.
13. **Estimate of Cost Burden**  
This collection should not have any effect on the capital and start-up costs nor the

operations of the respondents.

14. **Estimated Cost to Federal Government**  
Estimated annualized cost to the Federal government - 5000 respondents per year, based on an estimated one hour of staff time at an average of \$20 equals \$100,000 (1 hr. x 2000 respondents = 2,500 hrs. x \$20 = \$100,000).
15. **Reasons for Change in Burden**  
This form is currently a hard copy document completed by applicants and submitted as an attachment through OJP's Electronic Grants Management System.
16. **Plans for Publication**  
This information will not be published.
17. **Expiration Date Approval**  
Expiration date requested is 3 years from date of approval.
18. **Exceptions to the Certification Statement**  
The only exception to the certification is item (i), the use of statistical survey methodology. A statistical survey is not needed.

## *Authoritative Support*

**28 CFR Ch. 1 (7/1/99 Edition)  
Justice**

**Department of**

## **Subpart B--Pre-Award Requirements**

### **Sec. 66.10 Forms for applying for grants.**

(a) Scope. (1) This section prescribes forms and instructions to be used by governmental organizations (except hospitals and institutions of higher education operated by a government) in applying for grants. This section is not applicable, however, to formula grant programs which do not require applicants to apply for funds on a project basis.

(2) This section applies only to applications to Federal agencies for grants, and is not required to be applied by grantees in dealing with applicants for subgrants. However, grantees are encouraged to avoid more detailed or burdensome application requirements for subgrants.

(b) Authorized forms and instructions for governmental organizations. (1) In applying for grants, applicants shall only use standard application forms or those prescribed by the granting agency with the approval of OMB under the Paperwork Reduction Act of 1980.

(2) Applicants are not required to

submit more than the original and two copies of reapplications or applications.

(3) Applicants must follow all applicable instructions that bear OMB clearance numbers. Federal agencies may specify and describe the programs, functions, or activities that will be used to plan, budget, and evaluate the work under a grant. Other supplementary instructions may be issued only with the approval of OMB to the extent required under the Paperwork Reduction Act of 1980. For any standard form, except the SF-424 facesheet, Federal agencies may shade out or instruct the applicant to disregard any line item that is not needed.

(4) When a grantee applies for additional funding (such as a continuation or supplemental award) or amends a previously submitted application, only the affected pages need be submitted. Previously submitted pages with information that is still current need not be resubmitted.

### **Sec. 66.11 State plans.**

(a) Scope. The statutes for some programs require States to submit plans before receiving grants. Under regulations implementing Executive Order 12372, "Intergovernmental

Review of Federal Programs," States are allowed to simplify, consolidate and substitute plans. This section contains additional provisions for plans that are subject to regulations implementing the Executive Order.

(b) Requirements. A State need meet only Federal administrative or programmatic requirements for a plan that are in statutes or codified regulations.

(c) Assurances. In each plan the State will include an assurance that the State shall comply with all applicable Federal statutes and regulations in effect with respect to the periods for which it receives grant funding. For this assurance and other assurances required in the plan, the State may:

(1) Cite by number the statutory or regulatory provisions requiring the assurances and affirm that it gives the assurances required by those provisions,

(2) Repeat the assurance language in the statutes or regulations, or

(3) Develop its own language to the extent permitted by law.

(d) Amendments. A State will amend a plan whenever necessary to reflect: (1) New or revised Federal statutes or regulations or (2) a material changes in any State law, organization, policy, or State agency operation.

The State will obtain approval for the amendment and its effective date but

need submit for approval only the amended portions of the plan.

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## **Subpart B--Pre-Award Requirements**

### **Sec. 70.10** Purpose.

Sections 70.11 through 70.17 prescribe forms and instructions and other pre-award matters to be used in applying for the Department's awards.

### **Sec. 70.11** Pre-award policies.

(a) Use of grants and cooperative agreements, and contracts. In each instance, the Department shall decide on the appropriate award instrument (i.e., grant, cooperative agreement, or contract). The Federal Grant and Cooperative Agreement Act (31 U.S.C. 6301-08) governs the use of grants, cooperative agreements and contracts. A grant or cooperative agreement shall be used only when the principal purpose of a transaction is to accomplish a public purpose of support or stimulation authorized by Federal statute. The statutory criterion for choosing between grants and cooperative agreements is that for the latter, "substantial involvement is expected between the executive agency and the State, local government, or other recipient when carrying out the activity contemplated in the agreement." Contracts shall be used when the principal purpose is acquisition of property or services for the direct benefit or use of the Federal Government.

(b) Public notice and priority setting. The Department shall notify the public of its intended funding priorities for discretionary grant programs, unless funding priorities are established by Federal statute.

### **Sec. 70.12** Forms for applying for Federal assistance.

(a) The Department shall comply with the applicable report clearance requirements of 5 CFR part 1320, "Controlling Paperwork Burdens on the Public," with regard to all forms used by the Department as a supplement to the Standard Form 424 (SF-424) series.

(b) Applicants shall use the SF-424 series and instructions prescribed by the Department.

(c) For the Department's programs covered by Exec. Order No. 12372, "Intergovernmental Review of Federal Programs," the applicant shall complete the appropriate sections of the SF-424 (Application for Federal Assistance) indicating whether the application was subject to review by the State Single Point of Contact (SPOC). The name and address of the SPOC for a particular State can be obtained from the "Catalog of Federal Domestic Assistance." The SPOC shall advise the applicant whether the program for which application is made has been selected by that State for review.