

THE SUPPORTING STATEMENT

1. Circumstances Making the Collection of Information Necessary

This request is for a revision to the current information collection (Uniform Project Description (UPD), 0970-0139) that is to add statutorily mandated programs and add content to the UPD. This complete list of programs is at Attachment A.

The Administration for Children and Families (ACF) is requesting an extension of the Uniform Project Description (UPD) (OMB Control number 0970-0139). The UPD is available for use on an optional basis by program offices to solicit the project description information for project grants and cooperative agreements. This approach consists of a menu of narratives that the program office can select as required for a specific project or cooperative agreement announcement. Text options selected for use in a given program announcement define the required project description portion to the grant applicant. The ability to pick and choose standard language that's appropriate for any given program announcement reduces burden associated with application preparation by eliminating irrelevant portions of the application for a given announcement. In addition, it provides consistency in the application review process.

Much of the information required in applications for project grants and cooperative agreements is required by HHS Uniform Administrative Requirements for Grants and Cooperative Agreements at the following citations: 45 CFR Part 74, 45 CFR Part 92, and other regulations, promulgated by A-110 and A-102 respectively. Please note that A-110 has now moved to 2 CFR Part 215. However, ACF continues to follow 45 CFR Part 74 until HHS regulations can be moved to 2 CFR. Copies of the relevant OMB Circulars can be found at Attachments D and E, respectively.

2. Purpose and Use of the Information Collection

Administration for Children and Families (ACF) Program Offices, grants management officials, and expert non-Federal and Federal panel reviewers use the collected information provided through grant applications to select and award discretionary grants. Program Offices use the information to ensure that Congress's intent of authorizing legislation will be implemented through any funded grant project and that applicant entities are eligible to receive grant funds.

Expert non-Federal and Federal objective review panelists score the information provided in applications as they evaluate applications in the context of the program announcements' published criteria to ensure that the best proposed projects are funded.

Grants management officials use the information collected to ensure appropriate Federal stewardship of Federal grant funds. This includes review of audits, CPA certifications that appropriate financial systems are in place and that proposed budgeted project costs are allowable, allocable and reasonable.

3. Use of Improved Information Technology and Burden Reduction

Electronic submission of grant applications through Grants.gov is strongly encouraged but not required. Migration to an electronic grant application submission process reduces burden to the applicant and makes the overall process more efficient by eliminating delays inherent in a paper-based manual process. Electronic submission of applications via Grants.gov increased by 60% from FY08 to FY09, demonstrating the rapid acceptance and preference by applicants for electronic applications.

The electronic grant application process involves four functions. First, an interested party would use the FIND function to identify a particular public assistance funding opportunity. Second, the application package would be downloaded over the Internet. Next the applicant would prepare the application package offline and third, submit the application package electronically. Last, Grants.gov allows for the applicant to track the status of the submitted application.

Once an Authorized Organizational Representative (AOR) registers with Grants.gov as an AOR, the organization's registered E-Biz Point of Contact receives a notification and can authorize the AOR to submit grant applications through Grants.gov on behalf of the organization.

4. Efforts to Identify Duplication and Use of Similar Information

This is not applicable. Competitive applications are time and applicant specific. The Uniform Project Description provides a common way in which this information is collected to avoid duplicative efforts.

5. Impact on Small Businesses or Other Small Entities

The information requested is the minimum amount needed to comply with program requirements. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate these unique program criteria.

6. Consequences of Collecting the Information Less Frequently

If this information is not collected, adequate data will not be available to evaluate the proposed projects and select the appropriate grantees. Reduced frequency is not possible

as the annual frequency to solicit applications and make grant awards coincides with the annual appropriation of funds by Congress. Furthermore, not collecting applications for competitive projects would be inconsistent with Departmental policy and other authorities.

The consequence of requiring OMB review of individual program announcements would be to place additional stress on an already constrained annual grant cycle. The effect would be a delay in publishing program announcements and creating a need to shorten the time applicants have to submit announcements. Time for competitive review would also need to be compressed to allow for the award of grants by September 15 of each year. These consequences of non-approval are evidenced by the ACF's circumstances prior to approval of the UPD. With the addition of new programs, these consequences will become more pronounced.

Applications are required for project grants and cooperative agreements as prescribed by regulations and other authorities.

It's fundamental to the competitive award process.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Proprietary trade secrets or other confidential information are addressed at element 10 with excerpts from the HHS Grants Policy Statement.

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A notice was placed in the Federal Register on May 26, 2009, (Volume 74, Number 99) page number 24,857, soliciting comments to the ACF. No comments were received.

The active pool of ACF discretionary grantees includes

approximately 3,000 educational and private nonprofit institutions; and State, Local or Tribal Governments. Through routine inquiry, pre-award, post-award and post grant close-out phases of grant administration, dialogue routinely occurs between applicants and grantees. The substance and detail of the information collected is the focus of attention since it is the basis for award.

Because the grant establishes a relationship between ACF and the grantee, consultation with the community is a necessary and ongoing process.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts to applicants. The only remuneration is the grant payment dispersed to those entities awarded a grant.

10. Assurance of Confidentiality Provided to Respondents

Assurances of confidentiality necessary to inform the applicant of project grants and cooperative agreements are located in two specific places, Grants.gov and HHS policy which is incorporated in the HHS Grants Policy Statement (GPS). The following are excerpts from the relevant portions of those two sources:

Grants.gov

The Grants.gov privacy policy states that they “protect the rights of individual users under sections 552a of title 5, United States Code commonly referred to as the ‘Privacy Act,’ and other laws relevant to the protection of the privacy of an individual.”

Grants.gov does not require a user to submit information when browsing the site (using the FIND function); however, identifying information is collected from Authorized Organization Representatives (AOR) when representing their organization. This is done in compliance with the Privacy Act.

HHS Grants Policy Statement

ACF displays a link to the GPS on the ACF / ACF Grants Opportunities / Forms web page. Sections from the GPS appear below that address proprietary and confidential information:

Use of Application Information

Applicants are discouraged from submitting information considered proprietary unless it is deemed essential for proper evaluation of the application. However, if the application contains information that the applicant organization considers to be trade secrets, information that is commercial or financial, or information that is privileged or confidential, the pages containing that information should be identified as specified in the funding opportunity announcement or application instructions.

When non-Federal reviewers are used, the funding opportunity announcement or application instructions will specify that applicants have the option of omitting specific salary rates or amounts for individuals specified in the application budget and, if required by the OPDIV, Social Security numbers for individuals. For hard-copy applications, this can be accomplished by including the information in the original, but omitting it from the application copies. The copies may include summary salary information. For electronic applications, the information must be supplied to the OPDIV as part of the submission. The funding opportunity announcement will specify if the applicant should indicate, in the application or in a separate form, whether it wants to use that option. If the detailed information is an integral part of the application, the OPDIV will ensure that the information is not shared with reviewers.

The OPDIV will protect the information contained in an application from unauthorized disclosure, consistent with the need for objective review of the application and the requirements of the Freedom of Information Act and the Privacy Act. However, if a grant is awarded as a result of or in connection with an

application, the Federal government has the right to use or disclose the information to the extent authorized by law. Post-award considerations concerning release of information and access to research data are addressed in Part II of this policy statement.

Privacy Act

The Privacy Act of 1974, 5 U.S.C. 552a, and its implementing regulations (45 CFR part 5b) provide certain safeguards for information about individuals maintained in a system of records (i.e., information may be retrieved by the individual's name or other identifying information). These safeguards include the rights of individuals to determine what information about them is maintained in Federal agencies' files (hard copy or electronic) and how it is used; to have access to such records; and to correct, amend, or request deletion of information in their records that is inaccurate, irrelevant, or outdated.

Records maintained by OPDIVs with respect to grant applications, grant awards, and the administration of grants may be subject to the provisions of the Privacy Act. For example, OPDIVs that maintain or access any such records by name of an individual, such as by the name of the PI/PD, are subject to the Privacy Act.

Parties other than PIs/PDs may request the release of Privacy Act records. Such requests are processed in the same manner as FOIA requests. For example, information requested by co-investigators in grant applications is released to them only when required under FOIA because they have no right of access under the Privacy Act. When releasing information about an individual to a party other than that individual, OPDIVs will balance the individual's right to privacy with the public's right to know as provided by the FOIA.

11. Justification for Sensitive Questions

Questions of a sensitive nature are not asked. Please refer to the UPD narratives.

12. Estimates of Annualized Burden Hours and Costs

This request is for authorization to use the UPD for 51 statutorily mandated ACF programs for project grants and cooperative agreements.

The ACF estimates 6,752 applications will be submitted

annually. On average the burden hours per response is 40 hours. Frequency is once when the applications is solicited. Therefore, the total hourly burden annually is expected to be 270,080 hours. Hourly burden for the SF 424 series of forms is covered under a separate OMB information collection clearance.

Total annualized dollar cost based on hourly burden, based on \$35 per hour burdened, is \$9,472,400 (\$35 X 270,640 hours).

Instrument	Number or Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours
UPD	6,766	1	40	270,640

A copy of programs with their associated burden can be found at Attachment A.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Not applicable. Applicants for project grants and cooperative agreements develop applications using current employees who have an in-depth knowledge of the organization's capabilities and finances. This applies to total capital and start-up, total operation and maintenance, and purchase of services costs. In summary, there are no direct (incremental) monetary costs to respondents other than their time to prepare the applications. Information on the monetization of those costs are provided above under A.12

14. Annualized Cost to the Federal Government

It is estimated that, on average, there are 20 hours of labor on the part of government employees to develop the request package and Federal Register notices. The average

annual number of applications is 6,752 which equates to 135,040 hours of staff time. Based on an average of \$50 per hour, in monetary terms this equates to \$6,752,000. Therefore, approval of this request represents a savings to the Federal Government.

The competitive review is performed by outside reviewers which incur a cost with or without the UPD.

15. Explanation for Program Changes or Adjustments

There are adjustments resulting from revisions in estimating the number of responses. Program changes have occurred because of the addition of a program and revisions to UPD content. The cumulative effect has been a reduction on responses and hourly burden.

UPD content is being revised by adding a new text option for PROTECTION OF SENSITIVE AND/OR CONFIDENTIAL INFORMATION. Additionally, the former text option STAFF AND POSITION DATA has now been incorporated into a re-named text option ORGANIZATIONAL CAPACITY (formerly ORGANIZATIONAL PROFILES). The text option TOTAL DIRECT CHARGES, TOTAL INDIRECT CHARGES, TOTAL PROJECT COSTS was removed in its entirety. Revisions to the UPD are annotated at Attachment B, and the final UPD with internal instructions at Attachment C.

16. Plans for Tabulation and Publication and Project Time Schedule

Information in grant applications will not be published. Making information contained in a grant application available to the general public is prohibited. The disclosure of information in grant applications is closely regulated by and subject to The Freedom of Information Act (FOIA) and The Privacy Act of 1974.

The most significant exemptions from disclosure of grant application information are 4 and 5 in the FOIA. Exemption 4 protects from public disclosure two types of information: trade secrets and commercial or financial information

obtained that is privileged or confidential. Exemption 5 applies to internal government documents and permits the withholding of internal recommendations, advisory opinions, and materials used for evaluation.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

There will be no exceptions to the practice of displaying the expiration date. The display of the expiration date for OMB approval on a program narrative will never be considered inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.

B. Statistical Methods (used for collection of information employing statistical methods)

Statistical methods are not used since there is no attempt to draw inferences about a population. The applications received are the universe.