

SUPPORTING STATEMENT
U.S. Department of Commerce
Office of the Secretary
Office of Acquisition Management
Applicant for Funding Assistance
OMB Control No. 0605-0001

A. JUSTIFICATION

This is to request an extension of the Office of Management and Budget approval.

1. Explain the circumstances that make the collection of information necessary.

The Department of Commerce's (DOC) Form CD-346 is used to assist program and grants administration officials in determining the responsibility, financial integrity and management principles of principal officers and employees of organizations, firms, or recipients or beneficiaries of grants, loans, or loan guarantee programs of the Economic Development Administration (EDA), the Minority Business Development Agency (MBDA), the International Trade Administration (ITA), the National Oceanic and Atmospheric Administration (NOAA), and the National Telecommunications and Information Agency (NTIA). This is a name check process.

On October 28, 2008, the Office of Inspector General passed responsibility for administration of the name check process and stewardship of the Form CD-346 to the Office of Acquisition Management (OAM), Grants Management Division (GMD).

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The DOC, through the organizations cited above and other programs, assists reliable, capable individuals and firms in the pursuit of various business developments, business enterprise development and other forms of economic development. The Agency or Bureau Head is normally responsible for deciding which individuals or firms are reliable, capable, and worthy of assistance. The CD-346 is also completed, when required, by grant recipients. Through the name check process, the GMD collects background information on key individuals associated with proposed financial assistance (grants, cooperative agreements, loans and loan guarantees) recipient organizations. The name check identifies those principals affiliated with proposed recipient organizations who have been convicted of, or are presently facing, criminal charges or are under investigation for fraud, theft, perjury or other matters which have significant impact on questions of management honesty or financial integrity.

The information from the name check is entered by the Grants Management Division Specialist into a software application provided by the Bureau of Census into the Federal Bureau of Investigation Criminal Justice Information Services Division. Using this system, information can be turned around in three (3) to five (5) business days.

The information collected will not be disseminated and will be secured by the grant-making bureau. Consequently, it does not involve GMD's Information Quality Guidelines.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The information collection form is located on DOC's electronic forms website (<http://www.osec.doc.gov/forms/direct.htm#CD-346>). It is fillable and printable for submission.

4. Describe efforts to identify duplication.

A query, using information from Form CD-346, is conducted in the database on all name checks submitted prior to establishing a file. If a name check already

exists the submitting grants office is notified that there is an existing file and if there is any negative information on that on the file to report.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Small businesses or small entities may be part of any grant program. The minimal information required to process the form is requested no matter the size of the business or entity.

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

If the collection is not conducted or conducted less frequently, there is a possibility that federal funds may be granted to individuals with criminal backgrounds which may lead to fraud and/or abuse.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Not Applicable.

8. Provide information for the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Federal Register Notice soliciting public comment was published on December 14, 2009 (Vol. 74, Number 238, page 66086). No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not Applicable.

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

The necessary precautions will be taken to ensure that information is used only for official purposes and protected as appropriate. This information may also be shared, under certain circumstances, within the government. Any information deemed immaterial will be destroyed. A Privacy Act Advisory Statement is provided on the reverse side of CD-346.

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 questions of a sensitive nature are requested.

12. Provide an estimate in hours of the burden of the collection of information.

The annual estimate of recipient organizations is 300 and an estimated five forms from each recipient organization.

300 x 5 organization employees = 1,500 responses.

1,500 x 15 minutes = **Total Burden Hours 375.**

The estimated labor cost for respondents to complete the form is based upon an individual earning an average of \$45 per hour x 375 hours = \$16,875.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Not applicable.

14. Provide estimates of annualized cost to the Federal government.

The estimated annual cost to the Federal government using the figures above is based on two employees. A Bureau employee with a salary of \$52.61 per hour requiring one-half hour to verify the information on each form and write a memo to the GMD office; and the GMD Grants Management Specialist with a salary of \$52.61 per hour requiring one-half hour to enter the information into the software application provided by the Census Bureau into the Federal Bureau of Investigation Criminal Justice Information Services Division and retrieve the results.

$$\$52.61 \times 750 = \$39,458.$$

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Total cost to the government is \$78,916.

15. Explain the reasons for any program changes or adjustments.

The adjustment increase in burden hours (from 350 to 375) is to correct a miscalculation in the previous submission.

16. For collections whose results will be published, outline the plans for tabulation and publication.

The results of the collection will not be published.

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

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not Applicable.