

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION**

Iran Program Grants Vetting

OMB Number 1405- 0176

A. JUSTIFICATION

1. The State Department has made the awarding of grants a key component of its Iran policy. As a condition of licensing these activities, the Office of Foreign Assets Control (OFAC) has requested the Department of State to follow certain procedures to effectuate the goals of Sections 481(b), 531(a), 571, 582, and 635(b) of the Foreign Assistance Act of 1961 (as amended); 18 U.S.C. §§ 2339A and 2339B; Executive Order 13224; and Homeland Security Presidential Directive 6. These licensing conditions mandate that the Department conduct a vetting of potential Iran programs grantees and sub-grantees for counter-terrorism purposes. To conduct this vetting the Department envisions collecting information from grantees and sub-grantees regarding the identity and background of their key employees, board of directors, and program participants.
2. As noted above, this information is collected as part of procedures to effectuate the goals of Sections 481(b), 531(a), 571, 582, and 635(b) of the Foreign Assistance Act of 1961 (as amended); 18 U.S.C. §§ 2339A and 2339B; Executive Order 13224; and Homeland Security Presidential Directive 6. Data will be collected and used primarily by the Department of State's Bureau of Near Eastern Affairs (NEA), Bureau of Democracy, Human Rights and Labor (DRL), and Bureau of Educational and Cultural Affairs (ECA), in conjunction with the Bureau of Intelligence and Research (INR).
3. The form may be completed electronically and then printed, or printed and filled out by hand. The applicant may print out the form, scan it, and then submit the scan by e-mail or fax, or fully filled out and electronically submitted. Typically, the applicant will complete the form, scan it and forward it by e-mail. Original documents received from the applicant are then processed and locked in our vetting safe.
4. The information collected is not duplicative of other information collections.
5. This collection of information impacts small businesses or other small entities to the extent that they must provide information to obtain Federal grants.
6. Not collecting this information may permit those involved in terrorist financing, or supporting terrorism, to gain access to U.S. Government funds.
7. There are no special circumstances.
8. No comments were received on the 60-day published in the Federal Register
9. The Department does not make any type or form of payment to the respondent for the information other than payments to grantees.

10. Information relevant to the vetting of Iran program grantees will be maintained in accordance with Privacy Act provisions, to the extent the Act is applicable. The information will not be made available to the public to the extent permitted by law. Appropriate measures will be taken to assess the credibility of the information obtained. A Privacy Act Statement will be incorporated into the reporting document. Data provided will be checked against relevant and appropriate databases. If derogatory information is identified, a review and assessment of its reliability will be conducted by the affected Bureau at the Office Director level, which will either: (i) instruct the action officer to take appropriate action with respect to the funding request; or (ii) in those cases where interagency consultation may be useful or desired before the affected Bureau formulates a final decision, request further consultation with appropriate Agencies/Departments before rendering a decision. All records used or generated in this process will be maintained in accordance with an appropriate Privacy Act system of records notice. If determined to be reliable, appropriate action with respect to the funding request will be taken. This in-house screening process provides safeguards to make sure that applicants are screened in such a manner as to prevent a denial of application because of false or incorrect reporting or screening data
11. The form does not request information of a sensitive nature
12. The burden estimate below is based upon on broad estimates that grantees have given us. The burden hours are unique to our program and would not include burden hours for customary and usual business practices. There is no additional cost to respondents for the collections of this information beyond the hour burden.

The following data was used in the preparation of the hour burden:

- a. Number of Respondents: 200
 - b. Number of Responses: 200
 - c. Frequency of Response: On occasion.
 - d. Estimated form completion time: 1 hour
 - e. Annual hour burden: 200
13. There are no costs to respondents associated with this collection.
 14. There are no costs to the Federal Government, beyond the amount of hours that it takes to process the information collection.
 15. There are no program changes associated with this collection.
 16. The information collected will not be published.
 17. NEA, DRL, ECA and USAID will display the expiration date for OMB approval.
 18. No exceptions to the certification statement identified in OMB Form 83-I are requested

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.