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# SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

## A. Justification

### (1) Circumstances That Make Information Collection Necessary

The Senior Corps Grant Application is a federal grant application requirement specified by OMB Circulars A-102 and A-110 and the relevant sections of Title 42 of the United States Code that are applicable to Senior Corps programs.

The Grant Application is necessary to receive federal benefits and funds. The Senior Corps Grant Application is a modified version of the OMB-Standard SF-424 Application form.

### (2) How, By Whom, And For What Purpose the Information Is Used

The Grant Application is submitted by prospective grantees to apply for sponsorship of project grants under the Retired and Senior Volunteer Program (RSVP), the Foster Grandparent Program (FGP), the Senior Companion Program (SCP), and the Senior Demonstration Program (SDP) collectively known as the Senior Corps. Grant Applications are reviewed by CNCS officials in making funding decisions about potential applicants and serve as the basis for establishing performance agreements with grantees on project outcomes for the community and for the volunteers.

The Grant Application is also submitted by current Senior Corps grantees for second and third year continuation funding against approved grants.

### (3) Use of Information Technology

The grant application will continue to be available to Senior Corps grantees through the Corporation's web-based grant management system, "eGrants". Senior Corps grantees began using the eGrants systems to apply for grants in September 2002. All Senior Corps grantees use eGrants to enter and submit their Grant Applications. The requested revised grant application will continue to allow grantees to enter, update, save, print and access the latest information about their grants across a secure connection.

### (4) Efforts to Identify Duplication

The grant application form requests only the minimum information required to apply for a grant and for proper management. There is no duplication of information requested in other reports or available from other sources.

5) Efforts to Minimize Burden to Small Organizations

The Corporation is cognizant of the burdens placed on potential and existing grantee organizations and makes every effort to involve stakeholders fully in decisions that affect them. All previous versions of the Grant Application, as well as the version related to this request reflected grantee participation solicited through several Federal Register announcements, and recommendations, and various meetings.

Because Senior Corps grants are predominantly multi-year awards with limited turnover, many grantees are familiar with the accompanying federal forms. State Office officials of the Corporation, who provide frontline management to Senior Corps grantees, routinely assist new project directors with all aspects of grant management, including completing the grant application for the ongoing, non-competitive grants. For prospective new sponsors in affected geographical areas, bidder conferences are held to review the entire application process and requirements, including the Grant Application whenever relinquishment of a grant by an existing sponsor occurs.

In addition, Corporation State Office and Headquarters staff are available for consultation, thereby minimizing burden as much as possible.

In the future, the Corporation will continue efforts to reduce the project reporting burden wherever feasible.

(6) Consequences of Less-Frequent Collection

As this form is used during the application process, and is the key document for project development, award, and renewal, it does not lend itself to reduction in frequency of submission.

(7) Special Circumstances

None of the special circumstances apply to this data collection.

(8) Federal Register Notice and Solicitation of Comments

The Corporation published a 60-day and a 30-day request for public comments in the Federal Register. The opportunity to comment was sent to Corporation Program Officers to share with their Senior Corps grantees. The opportunity was also shared via the Senior Corps' electronic discussion list. The following summarizes the public comments received from the Notice summary:

(a) Two commenters supported the change and noted that an Executive Summary would add minimal burden to the application process. (b) Five commenters requested more details about the Executive Summary, asking what an Executive Summary is and what information will be required in it. The Executive Summary will ask respondents to summarize the application's contents. The Corporation will provide more details about the Executive Summary at the appropriate time. (c) One commenter indicated that the Corporation underestimated the additional time burden added by the executive summary. The Corporation agrees and has adjusted the estimated time accordingly. (d) One commenter suggested that the Corporation eliminate another part of the application to account for the addition of an Executive Summary. The Corporation believes that the additional burden of an Executive Summary will be minimal, and that the addition will increase the effectiveness and efficiency of the grant review process. Therefore, we do not intend to remove another portion of the application.

Through this request, the Corporation seeks to renew the current application with one significant change. The Corporation will ask applicants to include an Executive Summary in the document to improve the efficiency and effectiveness of the grant review process.

(9) Decisions to Provide Payments to Respondents

No payments will be provided.

(10) Confidentiality

This document does not collect information about individuals not in the public record. In situations where information identifiable to a person, the Corporation will comply with provisions of the Freedom of Information Act, the Privacy Act, and applicable sections of OMB Circular A-130, "Management of Federal Information Resources".

(11) Sensitive Questions

No sensitive questions are included in the data collection instruments.

(12) Estimates Of the Information Collection Burden

Estimated annual reporting and disclosure burden is 18,495 hours, based on an estimated 1,350 annual respondents, for a total estimated burden per respondent of approximately 14 hours. The overall burden is increased from the current 17,820 and the burden for individual respondents increased from the level of 13 hours to account for the addition of an Executive Summary.

Burden differs for applicants for new grants and applicants for revisions, as discussed below.

1. New Grants – Consistent with the policy of the Corporation, Senior Corps awards are made for 3 years. Based on current performance levels, approximately 95 percent of Senior Corps' current grants, or 1,282 are 3-year awards. The remaining 5 percent, or 68 total, would be approved for one year, based on limited experience in managing federal grants on the part of the grantee.
  - a. Applicants that are current Senior Corps Sponsors: For these applicants, the estimated average completion burden is 15.5 hours per submission, increased from 15 hours in the previous version of the Grant Application. Annual sponsor turnover rates have historically been 5 to 10 percent. Of this percent, approximately 60 percent of new or replacement sponsors are current sponsors who apply for and are awarded a second or third Senior Corps grant.
  - b. Applicants who are not current Senior Corps Sponsors: Annual sponsor turnover rates have historically been 5 to 10 percent. To cover competitions for these relinquished grants and competition for expansion grants into un-served or under-served areas if additional funds are made available, annual respondents were estimated at 180. Because these applicants are primarily first-time users of the Grant Application and the grants management system, burden was estimated at 17 hours per submission to provide additional time for familiarization with instructions and requirements.
2. Revision – With 3-year grants, interim-year submissions are annual. These submissions are significantly less cumbersome than for new grants, and only require a new Facesheet, Budget, and programmatic updates added or modified since the previous year. The average burden of the interim submission is estimated to be 5.5 hours.

For sponsors on 3-year cycles, the total 3-year burden of, on average, one full and one interim revision in each 3-year period was annualized.

The combined annualized cost to respondents, based on the burdens for collecting information and preparing and submitting the form electronically (or manually) and associated workload, based on an average hourly rate of \$16.85, is \$311,640. The basis for estimating cost per hour remains unchanged from prior years except for adjustment for inflation.

(13) Estimate of Annualized Cost to Respondents

Annualized costs to respondents are primarily staff costs associated with preparing the application, as identified in Item (12) above. These costs are within the cost and scope of conducting business and are estimated at \$0.

Other respondent costs applicable to this section are estimated at \$4,609.50. These are based on an estimated cost of \$3.50 each, based on annual submission of the Grant Application. The following comprise estimated respondent burden: apportionment of Internet connection time, paper to print out a hard copy report for respondent files when data submission is complete, and the cost of mailing required attachments once during a three-year grant cycle..

(14) Cost To the Federal Government

Annualized direct costs to the Federal Government, estimated at approximately \$250,000. The cost is incurred in the one major category of contractor costs, as follows:

- (a) Software Developer Contractor Costs: Contractor costs to develop and modify eGrants system screens and functionality. The Senior Corps apportionment of total software developer contractor costs is \$200,000.
  - (b) Contractor Help Desk Costs: The Corporation retains the services of a contractor to staff and manage a help desk that provides direct services to its grantees and applicants. The Senior Corps apportionment of the total help desk contractor costs is estimated at \$50,000 annually.

(15) Reasons For Changes in Burden

The overall burden for the collection is increased from 17,820 to 18,495 to account for the addition of an Executive Summary.

(16) Plans for Tabulation and Publication

Data are extracted from individual submissions and aggregated for reports used both internally and externally. Internally, Corporation management uses data to help define the characteristics of the grant portfolios as a whole. Data are also used for management purposes. Data extracted from some fields can be used to identify geographic communities in which grants operate, and the total Corporation funds in particular states.

(17) Approval to Not Display Expiration Date

Not applicable. The requested expiration date of May 31, 2014, will be displayed on the form upon OMB approval.

(18) Exceptions to Certification in Item 19

No exceptions are requested.

