

**Supporting Statement
Data Collection Form for
Assurances – Non-Construction Programs
SF-424B**

The SF-424B Assurances – Non-Construction Programs (SF-424B) form is an OMB approved collection (4040-0007). We are seeking an approval by OMB to reinstatement with change. The information will reflect the updated changes to the legal citations in location within the United States Code. The “Trafficking Victims Protection Act of 2000 (Section 106), as amended (22 USC 7104 (g) has been added in Section 18.

The SF-424B is used to provide information on required assurances when applying for non-construction Federal grants. The Federal awarding agencies use information reported on the form for the evaluation of award and general management of Federal assistance program awards. The only information collected on the form is the applicant signature, title and date submitted.

A. Justification

1. Need and Legal Basis

On an annual basis, the Federal government commits nearly twenty percent of the Federal budget, or approximately \$400 billion, to State and Local governments, Tribal organizations, education and research institutions, non-profit organizations, public housing authorities, and commercial organizations through the award of Federal grants. There are 26 Federal grant-making agencies with over 900 grant programs. To obtain Federal grant funds, applicant organizations must apply to the agency responsible for administering the grant program.

The Federal Grant and Cooperative Agreement Act of 1977 (31 USC 6301-6308) gives agencies the authority to select the appropriate award instrument within the limits of their program legislation to support or stimulate recipient activity. Public Law (PL) 106-107, the Federal Financial Assistance Management Improvement Act of 1999, was enacted to improve the effectiveness and performance of Federal financial assistance programs, simplify Federal financial assistance application and reporting requirements, and improve the delivery of services to the public. The issuance of the President’s Management Agenda in 2002 called for “agencies to allow applicants for Federal grants to apply for, and ultimately manage, grant funds online through a common web site, simplifying grants management and eliminating redundancies...”

The proposed SF-424B form assists agencies to implement the Office of Management and Budget (OMB) direction to use Grants.gov’s Apply mechanism (<http://www.whitehouse.gov/omb/memoranda/fy04/m04-05.html>). In its memorandum to agencies, OMB established Grants.gov as the Federal government’s single, online portal for any person, business, or State, Local and Tribal government to find and apply for

Federal grants. The collection may also be used in support of the American Recovery and Reinvestment Act of 2009.

2. Information Users

The SF-424B is the common Federal (standard) assurance form for non-construction grant applications. It has replaced numerous agency-specific assurances forms thus reducing the administrative burden to the Federal grants community that includes applicants/grantees and to Federal staff involved in grants-related activities. The form provides data to assist Federal program staff and grants officials in assessing the adequacy of applicant's proposals to accomplish project objectives and determine whether the business aspects of applications reflect program needs and grants policies. Agencies implement processes for reviewing the applications and awarding grant funds. These processes are reflected in agencies' policies and procedures documents. Agencies will also maintain and store application forms and data in accordance with their policies and practices. The public that may use the collection could include: Federal, State, local, or tribal governments, business or other for profit, and not for profit institutions.

3. Improved Information Technology

The Grants.gov Apply mechanism (<http://www.grants.gov/Apply>), which was deployed in October 2003, allows applicants to electronically apply for Federal grants. In its January 7, 2004 memorandum, OMB directed grant-making agencies to use Grants.gov's Apply mechanism (<http://www.whitehouse.gov/omb/memoranda/fy04/m04-05.html>). The SF-424B is submitted electronically through the Grants.gov portal. Applicants can complete application documents that they download from Grants.gov and submit them based on agency policies and instructions. Agency policies and instructions include detailed submission guidance such as due dates, eligibility, information requirements, supporting documentation, etc. Upon receipt of the application, Grants.gov will send an electronic acknowledgement to the applicant that the submission was received with the date and time of receipt. In addition, Grants.gov will deliver the application to the agency.

4. Duplication of Similar Information

Development of the SF-424B was an effort to reduce duplication of similar or identical forms and data sets across Federal agencies. This form also implemented the streamlining and simplification provisions of PL 106-107 and provides support for the President's Management Agenda to allow applicants for Federal grants to apply for grant funds online. A cross-agency work group developed the original proposed form.

5. Small Businesses

The SF-424B is designed to collect the minimum amount of information necessary to comply with the agency requirements and is based on a previously OMB approved collection. The only information collected on the form is the applicant signature, title and date submitted. The burden to all applicants, including small businesses and other small entities is reduced through use of the SF-424B.

6. Less Frequent Collection

The SF-424B form replaced other assurances forms previously used by agencies. If the SF-424B is not used, a variety of assurances forms would need to be used by program and grants officials to assess the adequacy of an applicant's proposals to accomplish project objectives and determine whether the business aspects of applications reflect program needs and grants policies. Additionally, a significant PL 106-107 grants streamlining and simplification opportunity will be missed and progress towards fully achieving the President's Management Agenda to allow applicants for Federal grants to apply for grant funds online would be impeded if the SF-424B were not used.

7. Special Circumstances

The proposed collection of information will be conducted in a manner that complies with relevant legislation authorizing Federal grants programs, OMB policies related to the administration of Federal grants including OMB Circulars A-102, A-110 (relocated to Relocated to 2 CFR 215), A-21 (relocated to 2 CFR 220), A-87 (relocated to 2 CFR 225), and A-122 (relocated to 2 CFR 230), and guidelines of 5 CFR 1320.5(d)(2).

8. Federal Register Notice/Outside Consultation

On April 27, 2010, the Grants.gov Program Management Office, one of the 26 E-Government initiatives, managed by HHS, published the current SF-424 B collection for public comment in the *Federal Register* (April 27, 2010, Volume 75, Number 80, page 22134). Interested individuals were invited to send comments regarding any aspect of this collection of information. No public comments were received.

9. Payment/Gift to Respondents

Not applicable since there is no payment to respondents, other than remuneration of grantees.

10. Confidentiality

The grant-making agencies will maintain the authoritative copy of all application materials and data. Collection of information will be consistent with OMB policies related to the administration of Federal grants as well as agency policies and practices for access to electronic and paper records. If application forms are submitted through the Grants.gov Apply mechanism, Grants.gov will maintain only transmission records pertaining to the files. Grants.gov will not maintain application materials and data.

11. Sensitive Questions

Not applicable since there are no sensitive questions.

12. Burden Estimate

By aggregating agency's estimates as reported from the Grants.gov data call, an estimate of the total burden of the information collection was developed. Agencies with zero response of Annual Respondents did not use the SF-424B in FY2010, but may elect to use the form for future use. Agencies electing future

use of the form will be added through a change request. All agencies with grant programs that award grants to organizations are eligible to use this form. Collectively, agencies receive approximately 46,521 applications annually and estimate that it takes applicants approximately 30 minutes to complete each application. Cumulatively, these organizations report the total burden to applicants to be approximately 23,266 hours.

Section A. Estimated Annualized Burden Hours to Respondents

SF-424B Form Estimated Annualized Burden to Respondents

AGENCY	SF-424 B Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden on Respondent per Response in Hours	Total Burden Hours
CNCS	5181	1	5181	30/60	2591
COMMERCE	6151	1	6151	30/60	3076
DHS	2493	1	2493	30/60	1247
DOD	5	1	5	30/60	3
DOE	0	1	0	30/60	0
DOI	1144	1	1144	30/60	572
DOL	2265	1	2265	30/60	1133
DOT	893	1	893	30/60	447
ED	0	1	0	30/60	0
EPA	4000	1	4000	30/60	2000
HHS	12682	1	12682	30/60	6341
HUD	0	1	0	30/60	0
IMLS	0	1	0	30/60	0
NARA	0	1	0	30/60	0
NASA	0	1	0	30/60	0
NEA	0	1	0	30/60	0
NEH	0	1	0	30/60	0
NIST	446	1	446	30/60	223
NRC	233	1	233	30/60	117
NSF	0	1	0	30/60	0
SBA	827	1	827	30/60	414
SSA	115	1	115	30/60	58
STATE	0	1	0	30/60	0
TREASURY	478	1	478	30/60	239
USAID	304	1	304	30/60	152
USDA	9027	1	9027	30/60	4514
USDOJ	77	1	77	30/60	39
VA	200	1	200	30/60	100
TOTAL	46,521		46,521		23,266

Section B. Burden Cost

SF-424B Form Estimated Annualized Cost to Respondents

Cost To Respondents				
AGENCY	Type of Respondent	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
CNCS	Grant Writer	\$ 30.00	2591	\$ 77,715.00
COMMERCE	Grant Writer	\$ 30.00	3076	\$ 92,265.00
DHS	Grant Writer	\$ 30.00	1247	\$ 37,395.00
DOD	Grant Writer	\$ 30.00	3	\$ 75.00
DOE	Grant Writer	\$ 30.00	0	\$ -
DOI	Grant Writer	\$ 30.00	572	\$ 17,160.00
DOL	Grant Writer	\$ 30.00	1133	\$ 33,975.00
DOT	Grant Writer	\$ 30.00	447	\$ 13,395.00
ED	Grant Writer	\$ 30.00	0	\$ -
EPA	Grant Writer	\$ 30.00	2000	\$ 60,000.00
HHS	Grant Writer	\$ 30.00	6341	\$ 190,230.00
HUD	Grant Writer	\$ 30.00	0	\$ -
IMLS	Grant Writer	\$ 30.00	0	\$ -
NARA	Grant Writer	\$ 30.00	0	\$ -
NASA	Grant Writer	\$ 30.00	0	\$ -
NEA	Grant Writer	\$ 30.00	0	\$ -
NEH	Grant Writer	\$ 30.00	0	\$ -
NIST	Grant Writer	\$ 30.00	223	\$ 6,690.00
NRC	Grant Writer	\$ 30.00	117	\$ 3,495.00
NSF	Grant Writer	\$ 30.00	0	\$ -
SBA	Grant Writer	\$ 30.00	414	\$ 12,405.00
SSA	Grant Writer	\$ 30.00	58	\$ 1,725.00
STATE	Grant Writer	\$ 30.00	0	\$ -
TREASURY	Grant Writer	\$ 30.00	239	\$ 7,170.00
USAID	Grant Writer	\$ 30.00	152	\$ 4,560.00
USDA	Grant Writer	\$ 30.00	4514	\$ 135,405.00
USDOJ	Grant Writer	\$ 30.00	39	\$ 1,155.00
VA	Grant Writer	\$ 30.00	100	\$ 3,000.00
TOTAL			23266	\$ 697,815.00

The Estimated Annualized Cost to Respondents assumes that the Hourly Wage Rate for a grant writer is \$30. The Total Burden Hours times the Hourly Wage Rate produces the Total Respondent Cost which is \$697,815.

13. Capital Costs

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the SF-424B form. It should be noted that many applicant organizations already have systems in place to respond to OMBs guidance to Federal grant-making agencies to use the Grants.gov "Apply" mechanism, which encourages the electronic submission of grants applications.

14. Cost to the Federal Government

The proposed SF-424B form is based on an OMB-approved form currently in use. There is no projected incremental increase in the cost burden to the Federal Government with the implementation of the renewed SF-424B form. Each agency currently has existing personnel, systems and processes (or other resources) in place to receive and review their grant applications. Any additional cost for agency system development, maintenance and enhancements should not be attributed to use of the SF-424B, and therefore its use is not expected to alter annualized Federal costs.

Cost to Government				
Total Annual Responses	Agency Personnel Time to Review (Hours)	Total Burden Hours on Agency Personnel	Average Grants Administrative Hourly Salary	Estimated Annual Cost to Federal Government for Form Review
46,521	20/60	15,352	\$39	\$598,725

The organization personnel time to review the form is estimated to average 20 minutes per form. Based on 46,521 responses per year, then 15,352 are estimated personnel hours to review. Grants administrative personnel generally are in the GS9 - 15 range. Based on a step one average of these grades, an average hourly salary is \$39 per hour. Therefore, 15,352 hours x \$39 = \$598,725 of estimated annual cost to the federal government to review the form.

15. Program or Burden Change

An increase of 1,775 burden hours resulted from program change due to agency discretion.

16. Publication and Tabulation Dates

There are no publication plans for collected data including summarizing or tabulating by Grants.gov. The federal agencies that use the form may use the data collected to provide information as required to OMB in accordance with the Federal Funding Accountability and Transparency Act.

17. Expiration Date

Not applicable since the OMB number will be included on the data collection form.

18. Certification Statement

Not applicable since there are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed in this information collection.