

**Supporting Statement
Data Collection Form for
Budget Information – Construction Programs
SF-424C**

The SF424C Budget Information – Construction Programs (SF424C) form is an OMB approved collection (4040-0008). We are seeking approval by OMB to reinstatement with change.

This form will be utilized by up to 26 Federal grant making agencies. We are requesting a three-year clearance of this form.

The SF424C is used to provide budget information when applying for 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.

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 SF424C 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 SF424C is the common Federal (standard) budget form for construction grant applications. It has replaced numerous agency-specific budget 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 SF424C 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 SF424C 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 SF424C 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 burden to all applicants, including small businesses and other small entities is reduced through use of the SF424C.

6. Less Frequent Collection

The SF424C form replaced other budget forms previously used by agencies. If the SF424C is not used, a variety of budget 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 SF424C 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 C collection for public comment in the *Federal Register* (April 27, 2010, Volume 75, Number 80, page 22135). 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-424C 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, Federal agencies receive approximately 12,347 applications annually and estimate that it takes applicants approximately one hour on average to complete each application. Cumulatively, these organizations report the total burden to applicants to be approximately 12,347 hours.

Section A. Estimated Annualized Burden Hours to Respondents

SF424C Form Estimated Annualized Burden to Respondents

AGENCY	SF-424C Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden on Respondent per Response in Hours	Total Burden Hours
CNCS	0	1	0	1	0
COMMERCE	1908	1	1908	1	1908
DHS	1421	1	1421	1	1421
DOD	1	1	1	1	1
DOE	0	1	0	1	0
DOI	131	1	131	1	131
DOL	0	1	0	1	0
DOT	50	1	50	1	50
ED	0	1	0	1	0
EPA	0	1	0	1	0
HHS	52	1	52	1	52
HUD	0	1	0	1	0
IMLS	0	1	0	1	0
NARA	0	1	0	1	0
NASA	0	1	0	1	0
NEA	0	1	0	1	0
NEH	0	1	0	1	0
NIST	193	1	193	1	193
NRC	1	1	1	1	1
NSF	0	1	0	1	0
SBA	26	1	26	1	26
SSA	0	1	0	1	0
STATE	0	1	0	1	0
TREASURY	0	1	0	1	0
USAID	294	1	294	1	294
USDA	7879	1	7879	1	7879
USDOJ	0	1	0	1	0
VA	391	1	391	1	391
TOTAL	12,347		12,347		12,347

Section B. Burden Cost

SF424C 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	0	\$ -
COMMERC E	Grant Writer	\$ 30.00	1908	\$ 57,240.00
DHS	Grant Writer	\$ 30.00	1421	\$ 42,630.00
DOD	Grant Writer	\$ 30.00	1	\$ 30.00
DOE	Grant Writer	\$ 30.00	0	\$ -
DOI	Grant Writer	\$ 30.00	131	\$ 3,930.00
DOL	Grant Writer	\$ 30.00	0	\$ -
DOT	Grant Writer	\$ 30.00	50	\$ 1,500.00
ED	Grant Writer	\$ 30.00	0	\$ -
EPA	Grant Writer	\$ 30.00	0	\$ -
HHS	Grant Writer	\$ 30.00	52	\$ 1,560.00
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	193	\$ 5,790.00
NRC	Grant Writer	\$ 30.00	1	\$ 30.00
NSF	Grant Writer	\$ 30.00	0	\$ -
SBA	Grant Writer	\$ 30.00	26	\$ 780.00
SSA	Grant Writer	\$ 30.00	0	\$ -
STATE	Grant Writer	\$ 30.00	0	\$ -
TREASURY	Grant Writer	\$ 30.00	0	\$ -
USAID	Grant Writer	\$ 30.00	294	\$ 8,820.00
USDA	Grant Writer	\$ 30.00	7879	\$ 236,370.00
USDOJ	Grant Writer	\$ 30.00	0	\$ -
VA	Grant Writer	\$ 30.00	391	\$ 11,730.00
TOTAL			12,347	\$ 370,410

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 \$370,410.

13. Capital Costs

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the SF424C form. It should be noted that many applicant organizations already have systems in place to respond to

OMB's 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 SF424C 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 SF424C 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 SF424C, 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
12,347	40/60	8,149	\$39	\$317,812

Organization personnel time to review the form is estimated at 40 minutes per form. Based on 41,340 responses per year, then 8,149 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 8,149 hours x \$39 = \$317,812 of estimated annual cost to the federal government to review the form.

15. Program or Burden Change

An increase of 3,070 burden hours resulted due to program change resulting from 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.

