SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

A. Justification

A1. Need for Information Collection

The Corporation for National and Community Service (CNCS) awards grants to states, institutions of higher education, non-profit organizations, Indian tribes, and U.S. Territories to operate AmeriCorps State, AmeriCorps National, AmeriCorps NCCC, AmeriCorps VISTA, and Senior Corps programs. This information collection allows the Corporation to meet its fiduciary responsibilities under the Uniform Administrative Requirements for Federal Grants to ensure grantees have effective systems in place to account for and manage Federal grant funds.

A2. Indicate how, by whom, and for what purpose the information is to be used.

Organizations that have never received a grant before from CNCS must complete the form before receiving a CNCS grant. CNCS uses the information to determine if grantees have proper accounting policies, procedures and systems in place to manage Federal grant funds and to identify any training and technical assistance the grantee may need to ensure they account for funds as required by Federal statutes, OMB Circulars and regulations. CNCS has used the information to design Federal Financial Management training for grantees and to provide technical assistance to grantees.

A3. Minimize Burden: Use of Improved Technology to Reduce Burden

The Corporation accepts electronic submission of the information and, if grantees are unable to report on-line, allows them to submit the attached form in hard copy.

A4. Non-Duplication

There are no other sources of information by which CNCS can meet the purposes described in A2 (above).

A5. Minimizing the economic burden for small businesses or other small entities.

This collection of information does not impact small businesses because they are not eligible to apply for grants. There is no economic burden to any other small entities beyond the cost of staff time to collect and report the data. This is minimized to the degree possible by only asking for the information absolutely necessary to assess the organization's financial management capabilities.

A6. Consequences of the collection if not conducted, conducted less frequently, as well as any technical or legal obstacles to reducing burden.

CNCS will be unable to determine if grantee financial systems are adequately designed and implemented to protect Federal resources. Federal funds could be used for unallowable purposes.

A7. Special circumstances that would cause information collection to be collected in a manner requiring respondents to report more often than quarterly; report in fewer than 30 days after receipt of the request; submit more than an original and two copies; retain records for more than three years; and other ways specified in the Instructions focused on statistical methods, confidentially, and proprietary trade secrets.

There are no special circumstances that would require the collection of information in any other ways specified.

A8. Provide copy and identify the date and page number of publication in the Federal Register of the Agency's notice. Summarize comments received and actions taken in response to comments. Specifically address comments received on cost and hour burden.

The 60 day *Notice* soliciting comments was published on January 12, 2011.

A9. Payment to Respondents

There are no payments or gifts to respondents.

A10. Assurance of Confidentiality and its basis in statute, regulation, or agency policy.

Information provided by this collection will be held solely by CNCS staff.

A11. Sensitive Questions

The information collection does not include questions of a sensitive nature.

A12. Hour burden of the collection

An organization that has been approved for a CNCS grant must complete the information collection only once. We expect about 20 respondents will have to complete the form and the frequency is only once. The time to complete the form and gather other required documents should not exceed 1.75 hours of effort per respondent. There is no annualized cost because an organization does not have to submit the form annually.

A13. Cost burden to the respondent

Not applicable.

A14. Cost to Government

There are no additional costs to the Government.

A15. Reasons for program changes or adjustments in burden or cost.

Not applicable.

A16. Publication of results

Not applicable because the responses to this information collection will not be published.

A17. Explain the reason for seeking approval to not display the expiration date for OMB approval of the information collection.

Not applicable.

A18. Exceptions to the certification statement

There are no exceptions to the certification statement in the submitted ROCIS form.