

**Justification for Nonsubstantive/Nonmaterial Change  
Generic Solicitation for Grant Applications  
Control Number 1225-0086**

The Department of Labor (DOL) seeks Office of Management and Budget (OMB) approval to request successful grant applicants to provide a redacted copy of portions of the applications and to have the OMB increase the burden allotment under the Departmental Solicitation of Grant Applications (SGA) generic information collection. This request is made to increase transparency in the grant award process—without disclosing any proprietary, confidential commercial/business, and personally identifiable information—and because earlier estimates of DOL SGA activity provided an insufficient burden ceiling.

The OMB has issued a waiver to DOL from Uniform Grant Guidance and Regulations so that the DOL may apply open government principles to the grant award process. This waiver allows DOL to require grant applicants to agree to allow DOL to publish on a public Web site abstracts of grant applications and the contents of all grant applications selected for award, with any proprietary, confidential commercial/business, and personally identifiable information redacted before publication. The specific grant application contents that would be posted may vary between solicitations, e.g., the narrative summary or technical proposal; consequently, the DOL is providing a generic letter/email to explain the process. Specific generic requests will include a copy of the specific communication.

In order to ensure that confidential information is properly protected from disclosure when DOL posts winning Technical Proposals, applicants whose technical proposals will be posted will be asked to submit a second redacted version of their Technical Proposal, with proprietary, confidential commercial/business, and personally identifiable information redacted. All non-public information about the applicant's staff should be removed as well.

The DOL will contact the applicants whose technical proposals will be published by letter or email, and provide further directions about how and when to submit the redacted version of the Technical Proposal. Submission of a redacted version of the Technical Proposal will constitute permission by the applicant for DOL to post that redacted version. If an applicant fails to provide a redacted version of the Technical Proposal, the DOL will publish the original Technical Proposal in full, after redacting personally identifiable information. (Note that the original, unredacted version of the Technical Proposal will remain part of the complete application package, including an applicant's proprietary and confidential information and any personally identifiable information.)

This process will be expected to add one hour of burden to successful applicants; however, given the ratio between grant applicants and grant awards, the average per respondent burden is expected to remain unchanged.

With respect to the burden ceiling aspect of this request, the current authorization for Control Number 1225-0086 is scheduled to expire 11/30/2012; consequently, we are roughly half-way through the authorization period. The DOL has used approximately 85 percent of the current burden hour allotment. The DOL seeks to increase the estimated number of responses to 7500 (a change of 1750 responses), with a corresponding burden hour increase to 150,000 (a change of 35,000 hours).