

**Supporting Statement
Detailed Budget Justification
OMB Number 1910-New**

This supporting statement provides additional information regarding the Golden Field Office request for processing of the emergency proposed information collection, Detailed Budget Justification. The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, "Instructions for Completing OMB Form 83-I."

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Energy Policy Act of 2005 (EPACT 2005; P.L. 109-58), the Energy Independence and Security Act of 2007 (EISA; P.L. 110-140), and the American Reinvestment and Recovery Act of 2009 (ARRA; P.L. 111-5) all generated numerous energy efficiency and renewable energy research (EERE), development, demonstration, and outreach incentive programs. The DOE manages a large number of these EERE incentive programs, including a vast amount of public Financial Assistance Awards in the form of Grants and Cooperative Agreements. Grants and Cooperative Agreements are administered through various EERE technologies, including: Solar, Biomass, Wind, Hydropower, Advanced Manufacturing, Geothermal, Hydrogen, and numerous Energy Efficiency Programs. Awards are made to State and Local Governments, Educational Institutions, National Laboratories, Non-Profit Organizations, and For-Profit Organizations. These entities vary in size, location, and area of expertise. The awards are competitive in nature, where Funding Opportunity Announcements (FOAs) are released to the general public and eligible entities have the ability to propose a project through a formal application process. Applications are then reviewed by technical experts for merit and public interest. Applications for projects with the greatest value to the taxpayer and the EERE mission are then selected for Award.

The 10 CFR 600 implements the Federal Grant and Cooperative Agreement Act, Pub. L. 95-224, as amended by Pub. L. 97-258 (31 U.S.C. 6301-6308), and establishes uniform policies and procedures for the award and administration of DOE grants and cooperative agreements. Subpart A sets forth the general policies and procedures applicable to the award and administration of grants, cooperative agreements, and technology investment agreements. 10 CFR 600.112 states that (b) DOE may request and the recipient shall submit the minimum budgetary information necessary to evaluate the costs of the proposed project; and that (c) DOE may, subsequent to the receipt of an application, request additional information from an applicant when necessary for clarification or to make informed pre-award determinations.

The aforementioned policies and procedures apply to applications, funding opportunity announcements, and new, continuation, and renewal awards. Any new, continuation, or renewal award (and any subsequent subaward) shall comply with any applicable Federal

statute, Federal rule, Office of Management and Budget (OMB) Circular and Government-wide guidance in effect as of the date of such award.

This collection of information is necessary in order for the Golden Field Office to evaluate application budgets and projects that are eligible for Grants and Cooperative Agreements in compliance with uniform policies, procedures, administrative requirements, cost principles, and audit requirements within EERE programs.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collected for the Detailed Budget Justification will be used by DOE officials to evaluate application budgets for cost reasonableness and allowability. The detailed budget justification will also be used to review recipient regulation compliance for DOE Grants and Cooperative Agreements. The information will be used for evaluation of continuation and renewal applications from recipients. The information received on current budget forms does not contain sufficient explanations to justify the budget because only dollar values are on the forms (SF 424A and SF 424 R&R Budget Form). Without explanatory comments to accompany the budgets, it is difficult to evaluate the information consistently during application compliance reviews and when finalizing grant award agreements. Therefore, the use of the Detailed Budget Justification, with explanatory comment sections, is requested to be used.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Funding Opportunity Announcement applications are submitted in electronic format through Grants.gov. In applications, the Detailed Budget Justification would be submitted in an Excel file. During the post-award phase, Recipients will send budget application documentation via email directly to Golden Field Office contacts. The 'Detailed Budget Justification' spreadsheet is in MS Excel format and utilizes budget formulas that provide summarizations and correspond to multiple sheets/tabs. This greatly reduces burden on users by eliminating redundant data entry and external calculation.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The Golden Field Office must evaluate each budget line item in sufficient detail, to ensure that application costs are reasonable and allowable. In order to conduct those

evaluations, justification comments must be submitted to explain the costs. Therefore, the Detailed Budget Justification form was developed to get the explanations with the budget, so that subsequent requests for budget justifications can be avoided. To do so, it is necessary to have a consistent and reliable budget format that can be used to meet the Golden Field Office's evaluation needs. Industry normally develops this budget information for new projects, yet each grant and/or cooperative agreement is very unique in nature. By utilizing the Detailed Budget Justification, users will be able to employ this tool to facilitate the compilation of cost and budget data in a clear and concise manner. The most relevant OMB Approved form, the SF424 R&R Budget Form, is oriented more for educational institutions and does not parallel our budget process in an efficient or effective manner. Reviewers have found it difficult and cumbersome to employ. The SF 424A is another form that summarizes budget information. However, neither of these forms contains sections for comments or explanations for each budget line item.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Grants and Cooperative Agreements out of the Golden Field Office typically have open funding eligibility to all organization sizes and types, including small businesses. The Detailed Budget Justification tool will assist the small organization in adherence to applicable federal regulation by offering a standardized budget compilation tool to convey project cost projections with minimal negotiation and correspondence with the Golden Field Office.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information is not collected, the Golden Field Office will be unable to adequately implement the administrative guidance required by the 10 CFR 600, the Cost Principles by 2 CFR 220, 2 CFR 225, 2 CFR 230, FAR 31.2, and the audit requirements of OMB Circular A-133 and Policy Flash 2011-7. The lack of consistent budget submissions will hinder efficiency and prolong the award process for recipients and federal staff. It also implies an unnecessary cost burden due to forgone savings resulting from streamlining efforts.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

If a specific Grant or Cooperative Agreement Project Period is longer than 3 years, budget, accounting, and payment records would be required for longer than 3 years.

Grants and Cooperative agreements may utilize new or original technologies and engage products or processes not yet on the market. Applicants may be required to submit proprietary budget data to justify the Award costs of a Grant or Cooperative Agreement.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 23, 2011, volume 76, number 99, and page number 29733. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

No payment or gift to respondents is being proposed under this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Patentable ideas, trade secrets, proprietary or confidential commercial or financial information, disclosure of which may harm the applicant, should be included in an application only when such information is necessary to convey an understanding of the proposed project. To protect such data, each line or paragraph on the pages containing such data must be specifically identified and marked. DOE is responsible for the final determination with regard to disclosure or nondisclosure of the information and for treating it accordingly under the DOE Freedom of Information regulations at 10 CFR 1004.11.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Questions of a personally sensitive nature, such as sexual behavior and attitudes, and religious beliefs are not included in this information request. The information collected is of a budgeting nature. Projected budget data that an organization may deem sensitive is reviewed only to assure that it is allowable, allocable, and reasonable and within the applicable Administrative Guidelines and Cost Principles.

12. Provide estimates of the hour burden of the collection of information.

The estimate of hour burden of the information collection is as follows: 3 hours per collection

Total number of unduplicated respondents: 406 per year (projected number of 2011 new Award recipients at the Golden Field Office from projected 2011 FOAs)

Reports filed per person: 1

Total annual responses: 406

Total annual burden hours: 1,218

Average Burden	Per Collection: 3 hours, one response
	Per Applicants: 1,218 hours per year

The public reporting burden for the collection of information is estimated to average 3 (total burden hours/total annual responses) hours per response. The respondents are applicants and recipients of Grants and Cooperative Agreements.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

All respondent costs will be associated with the input of data to into the Detailed Budget Justification form, and any needed revision after DOE review. The recipient will not be required to perform any auxiliary business functions as a requirement in filling out the form.

\$36.49 (Average US DOL Engineer/Cost Estimator Wage) x 3 (hours) = \$109.47

Ongoing cost burden will only occur if the actual project costs greatly vary in correlation to the original budget projections entered into the Detailed Budget Justification and need to be revised. It is estimated that 25% of the forms will require revisions. In these cases, the revision would take an estimated 1 hour, or an additional \$36.49.

14. Provide estimates of annualized costs to the Federal government.

All DOE costs will be associated with the review of data submitted via the Detailed Budget Justification form and instruction given to respondents in implementing corrections. Form directions and purpose of information collection are included on the actual form, but these may require clarification. DOE will review this data for allowability, allocability, and reasonableness. Data may be compared to industry standards and checked for congruency with Federal Administrative Requirements and Cost Principles.

\$29.87 (Average Grants Management Specialist Wage at GFO GS-9/11/12 step 1) x 1 (hour) = \$29.87

Ongoing cost burden will only occur if the Detailed Budget Justification is revised and resubmitted. It is estimated that 25% of the forms will require revisions. In these cases, the revision would take an estimated 20 minutes to review, or an additional \$9.95.

Budget information submissions are currently required by federal guidance, however as we have no approved OMB format, the submissions are inconsistent, irregular, and in varying formats. If we had an approved format it would reduce federal burden and labor costs by streamlining the review and approval process. Grants and Cooperative Agreements could be awarded in a much more efficient and timely manner.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new collection; therefore there are no program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collected is not intended to be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Golden Field Office is not seeking approval to not display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.