

**Supporting Statement
For
Challenge and Competition Solicitations**

The Immediate Office of the Secretary, Office of the Secretary, Department of Health and Human Services (DHHS) requests that the Office of Management and Budget (OMB) approve a request for a generic approval of the information collected for challenge and competition solicitations. The request is being sought to implement the use of Challenge competitions as a means to promote innovative solutions to the problems and needs confronting DHHS. The approval would enable DHHS to collect specific information necessary to evaluate solutions provided by individuals and/or organizations in response to requests by the Federal government.

Under the guidance of the DHHS Innovation Council, the Assistant Secretary for Administration, and the Chief Technology Officer, strategies are being adopted across DHHS to promote the use of challenges and competitions as a means to engage innovative ideas to address critical issues dealing with health and human services. DHHS programs will use an information technology platform known as “challenge.gov” developed by the General Services Administration in most cases. Challenge.gov provides a free, central location for the posting of challenges to the public and serves as a platform for solution providers to submit information about themselves and the information about their solution. In the future, solicitations of interest for challenge competitions may make use a variety of platforms for engaging solution providers.

This request addresses inclusion of structured information that will uniformly be requested of many challenges to be conducted by DHHS.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

On January 21, 2009, the President issued a memorandum calling for the establishment of “a system of transparency, public participation, and collaboration.” The memorandum required an Open Government Directive to be issued by the Director of the Office of Management and Budget (OMB), instructing “executive departments and agencies to take specific actions implementing the principles set forth in this memorandum.” Among the means to engage in Open Government activities advocated was the use of challenges and competitions mechanisms that would engage the public in new ways to participate in government activities.

With regard to specific initiatives on conducting prizes and challenges, OMB issued Memorandum 10-11 in March 2010 entitled “Guidance on the Use of Challenges and Prizes to Promote Open Government.”

http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-11.pdf

Through this policy, agencies were encouraged to develop challenges and competitions that provide opportunities to engage new communities to help with problem-solving consistent with the approach of a more open government. In 2011, agencies were given additional authorities that enable them to use prize authority for challenges and competitions. Section 105(a) of the America Competes Act, adds Section 24 to the Stevenson-Wydler Technology Innovation Act of 1980 (15 U.S.C. 3701 et seq.) that addresses provisions for challenges and competitions with prizes conducted by Federal agencies. Although the Act does not specify requirements under PRA, however, reference is made to the use of a common platform for managing Federal challenges and competitions.

Challenges and competitions enable HHS to tap into the expertise and creativity of the public in new ways. Within HHS, the Innovation Council, an interagency Council charged with promoting innovation across HHS, has taken lead responsibility in coordinating challenges and competitions and implementing policies regarding the use of these tools. HHS has sponsored challenges and competitions in a wide variety of areas such as recruitment efforts, health data applications and other types of data, and communications to increase public participation and solicit new ideas on a wide array of topics important to the agencies mission. This could include measuring national health objectives and making them easily accessible for health officials and community decision makers or determining how effective health promotion can affect healthy weight, physical activity, and nutrition. HHS's goal is to engage a broader number of stakeholders who are inspired to work on some of our most pressing health issues, thus supporting a new ecosystem of scientists, developers, and entrepreneurs who can continue to innovate for public health.

The generic clearance is necessary for HHS to launch several challenges or competitions annually in a short turnaround. The information collected for these challenges and competitions will generally include first name, last name, email, city, state and when applicable other demographic information. This data is necessary to identify contestants as eligible participants, and to collect contact information to follow up if their work is selected as a finalists and/or subsequent winner. Upon entry or during the judging process, applicants under the age of 18 may be asked to confirm parental consent, requiring students under 18 to have a parent signature in writing on a parental consent form provided by the Department in order to qualify for the contest. For certain challenges we may also need to collect data such as types of data sets used in the solution, types of software tools used in the solution, and information regarding uses of proprietary software (i.e., licenses or use agreements). Eligibility will be outlined in the specific criteria of each contest and will only apply to U.S. citizens.

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 will be collected on challenge.gov or a similar platform for the operation of a challenge competition. The information will be used by agency program managers, and administration officials to evaluate and judge elements of the challenge competitions.

Information obtained from the solutions provider will be used by the program managers (challenge manager), other agency officials (such as general counsel representatives) and in some cases the technical reviewers acting on behalf of the program manager (challenge manager). The information collected will be for the following purposes: verify data sources, understand whether the solution provider has met the technical requirements for the challenge, has completed the challenge to the specifications of the challenge parameters, to assist in technical review and judging of the solutions that are provided. In addition, the information can be used to determine if valid methodology, appropriate approvals for use of data sources, and other resources used in the solution development are valid.

To obtain approval for a collection under this generic, HHS will provide a copy of the Federal Register notice used for the challenge, a standardized form that includes an estimate of the burden, and the instrument (e.g., a questionnaire) to OMB.

As described in the “Guidance for Federal Register Notice Required Under the America COMPETES Act of 2010 for the Requirements and Registration of Challenges and Competitions” (submitted with this request), a program manager will be required to publish a Federal Register notice announcing each challenge. In the notice, the program manager will be required to provide answers to the following questions:

- 1) What action is being taken?
- 2) Why is this action necessary?
- 3) What is the objective of the challenge?
- 4) What is the intended effect of this action?

They will also be required to fully describe the subject of the challenge, the eligibility requirements, the amount of the prize, and the method of payment. (We have included a copy of HHS guidance on the Federal Register notice as part of this request.)

It is this notice that will be provided to OMB (prior to publication) with information about the burden, a brief description of the questions or other information that will be requested from the entrant, and any screenshots that contain the information. [Note: The submission will focus on the information collected as part of the challenge entry that is subject to the Paperwork Reduction Act.]

The Agency has established a managing entity to ensure compliance with the terms of this clearance.

We are requesting that OMB allow for automatic approval , unless OMB identifies an issue, within 5 business days after submission.

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

The challenge.gov is an open source, web-based technology to support the challenge competitions. This minimizes the time and burden to solutions providers and reviewers.

4. Efforts to Identify Duplication and Use of Similar Information

As these are challenges that request information to help identify individual submissions, there are no previously existing methods to obtain the same information as requested.

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.

The information collected here supports challenges and competitions that represent substantial opportunity for small businesses. Many facets of the challenges are aimed at entrepreneurs and small businesses; therefore the challenge.gov or related interactive technology platform is an easily accessible resource for small businesses to compete for awards.

6. Describe the consequences 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.

Each challenge or competition cannot be completed without a collection of data and each will require a one-time collection.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;

The participants will be required to submit their information one time only in order to participate in the corresponding challenge or competition.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The respondents will be required to respond as directed in the respective challenge or competition guidelines.

- requiring respondents to submit more than an original and two copies of any document;

Respondent will only submit one original copy for a given challenge or competition.

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

No records will be retained.

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

N/A

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

N/A

- that includes a pledge of confidentiality that is not supported by authority established in statute or 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; or

N/A

- 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.

This collection is consistent with 5 CFR 1320.5.

8. Federal Register Notice/Outside Consultation

The 60-day *Federal Register* notice was published on August 1, 2011. There were no comments received. In addition, HHS remains in close contact with the challenge community to obtain their views on the submission of information to the challenge.gov platform.

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

For many challenges, prizes in the forms of cash or material goods are offered as a means for rewarding the best solution(s). The payment or gift is only made upon competing and being selected as a winner in the challenge. There will be no direct inducement to participate in a challenge. Only those who submit and win a challenge competition will receive the award.

10. Confidentiality

Participation in a challenge competition is entirely voluntary. The challenge.gov website provides clear parameters for the respondents regarding the type of information that is requested to participate in a challenge. The information collected about a submission is used only for the purposes of conducting the challenge competition and is not used for any other purpose.

We will not provide an assurance of confidentiality.

11. Sensitive Questions

No sensitive information is requested

12. Burden Estimate (Total Hours & Wages)

The Department anticipates receiving approximately 500 respondents for each challenge or competition under this generic clearance. Each participant will create an entry (e.g., video, essay). The time it takes to create an entry will vary, but the Department estimates that these challenges would, on average, take xxx hours (or minutes) to create.

A. Estimated Annualized Burden Table

| Type of Respondent | Number of Respondents | Number of Responses per Respondent | Average Burden (in hours) per Response | Total Burden Hours |
|---|-----------------------|------------------------------------|--|--------------------|
| Individuals or Households | 500 | 1 | 1/6 | 83.3 |
| Organizations | 500 | 1 | 1/6 | 83.3 |
| Businesses | 500 | 1 | 1/6 | 83.3 |
| State, territory, tribal or local governments | 30 | 1 | 1/6 | 5 |
| Total | 1530 | | | 250.9 |

B. Estimated Annualized Burden Costs

| Type of Respondent | Total Burden Hours | Hourly Wage Rate | Total Respondent Costs |
|---|--------------------|------------------|------------------------|
| Individuals or Households | 83.3 | \$5.25 | \$437.33 |
| Organizations | 83.3 | \$5.25 | \$437.33 |
| Businesses | 83.3 | \$5.25 | \$437.33 |
| State, territory, tribal or local governments | 5 | \$5.25 | \$26.25 |
| Total | | | \$900.91 |

13. Capital Costs (Maintenance of Capital Costs)

None. Since the platform that is used to conduct challenges is operated free of charge by the General Services Administration, HHS incurs no additional charges.

14. Costs to Federal Government

We estimate the burden to the government for the management of the information related to the additional requests for the challenge.gov site will result in approximately 1/10th of an FTE used continuously during the 3 year period. The time required will be to associate the data collection with the submission to the challenges that are received. Estimated costs are \$13,850 per year.

15. Program Change or Adjustment

This is a new data collection.

16. Publication and Tabulation of Data

The information collected through this request is for internal HHS review and will not be published.

17. Expiration Date

The approval number and expiration date will be placed at the front of the challenge.gov site or related technology sites that host challenge competitions pending GSA approval or will be included in each of the HHS challenges that request this information.

18. Certification Statement

No exceptions are taken to the certification statement