

Supporting Statement
Data Collection Form for Application for Federal Assistance
SF-424(R&R)

The SF-424 Research and Related form (R&R) is an OMB approved collection (4040-0001). We propose revising the collection to include changes adopted by the cross-agency R&R working group. This working group established the original proposed collection of 4040-0001 in 2004. The form instructions will also be revised.

This collection will be utilized by up to 26 Federal grant making agencies. The 4040-0001 collection expires on June 30, 2011. We are requesting a three-year clearance of this collection. The 4040-0001 proposed collection encompasses the following forms:

SF 424 (R&R) Application for Federal Assistance (Cover)
R&R Personal Data
R&R Senior/Key Person Profile
R&R Senior/Key Person Profile (Expanded)
R&R Other Project Information
SBIR/STTR Information
R&R Budget (up to 5 years)
R&R Budget (up to 10 years)
R&R Federal/Non-Federal Budget (up to 5 years)
R&R Federal/Non-Federal Budget (up to 10 years)
R&R Subaward Budget Attachment(s) Form (up to 10 attachments)
5 Year R&R Subaward Budget Attachment(s) Form (up to 30 attachments)
10 Year R&R Subaward Budget Attachment(s) Form (up to 10 attachments)
10 Year R&R Subaward Budget Attachment(s) Form (up to 30 attachments)

There are four requested changes to the SF 424 (R&R) Application for Federal Assistance (Cover): 1) Addition of a new field numbered 4.C and titled "Previous Grants.gov Tracking Number"; 2) Modification of an existing section "Person to be contacted on matters involving this application" to include the following fields (* to indicate Mandatory fields): Position/Title, Street1*, Street2, City*, County/Parish, State*, Province, Country*, ZIP/Postal Code*; 3) Update current field label for Item 18 from "SF LLL or other Explanatory Documentation" to "SF LLL (Disclosure of Lobbying Activities) or Other Explanatory Documentation"; 4) Addition of a new optional field numbered 21 entitled "Cover Letter Attachment".

There are four requested changes to the R&R Other Project Information form: 1) Addition of yes/no question "1.b Is this a Clinical Trial?"; 2) Addition of a new field titled "3.a Areas of Research"; 3) Change existing field label for 4.a from "Does this project have an actual or potential impact on the environment?" to "Does this Project Have an Actual or Potential Impact - positive or negative- on the

environment?"; 4) Change existing field label for 4.b from "If yes, please explain" to "If yes, please explain – Enter an explanation for the actual or potential impact (whether positive or negative) on the environment."

These changes to the instructions will increase data quality and clarity for the collection. Agencies will not be required to collect all of the information in the proposed data set. The agency will identify the data that must be provided by applicants through instructions that will accompany the application forms.

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. A variety of these Federal agencies have research-related grant programs authorized by legislation covering a broad range of diverse research subject matter. To obtain Federal grants 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 R&R collection assists agencies with research grants 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.

2. Information Users

The R&R consolidates research and related grants application data and forms used by Federal grant-making agencies with a research mission or conducting

research-related activities. The R&R is the common Federal (standard) form for research-related grant applications. It has replaced numerous agency-specific 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 information collection 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. Federal agencies will not be required to collect all of the information included on the proposed form. The agency will identify the specific sections with the R&R that must be completed by applicants through instructions that will accompany the forms. Agencies will 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>). Information on the R&R will be entered into fillable forms and 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 R&R collection was an effort to reduce duplication of similar or identical forms and data sets across Federal agencies. This information collection 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 R&R collection that will serve as a common application form for research-related grant programs.

5. Small Businesses

The R&R collection 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. Only applicants that are interested in pursuing a

Federal research grant opportunity will use the R&R collection. The burden to all applicants, including small businesses and other small entities is reduced through use of the R&R. Applicants will use this form and data set to apply for research-related grants in any of the Federal grant-making agencies rather than using each agency's research-related grants application forms.

6. Less Frequent Collection

The R&R collection replaced other application forms and data sets used by a variety of agency research grant programs. If the R&R collection is not used, a variety of existing forms and data will be used to assist program and grants officials in assessing 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 R&R 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

The requested changes to the SF-424 R&R family of forms will be posted to the Federal Register for a 60-day comment period. Comments will be collected, addressed, and released for a 30-day comment period.

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 documented in their Paperwork Reduction Act Change Worksheets (OMB 83-C), an estimate of the total burden of the information collection was developed. The agencies who plan to use the forms are the Department of Homeland Security, Department of Commerce, Department of Defense, Department of Energy, Department of the Interior, Department of Transportation, Department of Education, Department of Health and Human Services, National Archives and Records Administration, National Aeronautics and Space Administration, National Science Foundation, US Agency for International Development, and United States Department of Agriculture. Collectively, these agencies receive approximately 97,581 applications annually and estimate that it takes applicants approximately 60 hours on average to complete each application. Cumulatively, these organizations report that the total burden to applicants to be approximately 5,854,860 hours.

Section A. Estimated Annualized Burden Hours to Respondents

SF-424 (R&R) Form Estimated Annualized Burden to Respondents

AGENCY	Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden on Respondent per Response in Hours	Total Burden Hours
DHS	173	1	173	60	10380
DOC	165	1	165	60	9900
DOD	17943	1	17943	60	1076580
DOE	7292	1	7292	60	437520
DOI	41	1	41	60	2460
DOT	370	1	370	60	22200
ED	2000	1	2000	60	120000
HHS	62133	1	62133	60	3727980
NARA	1	1	1	60	60
NASA	102	1	102	60	6120
NRC	2	1	2	60	120
NSF	1001	1	1001	60	60060
USAID	9	1	9	60	540
USDA	6,349	1	6349	60	380940
TOTAL	97,581		97,581		5,854,860

Section B. Burden Cost

SF-424 (R&R) Form Estimated Annualized Cost to Respondents

AGENCY	Type of Respondent	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
DOC	Grant Writer	\$30.00	10380	\$311,400.00
DHS	Grant Writer	\$30.00	9900	\$297,000.00
DOD	Grant Writer	\$30.00	1076580	\$32,297,400.00
DOE	Grant Writer	\$30.00	437520	\$13,125,600.00
DOI	Grant Writer	\$30.00	2460	\$73,800.00
DOT	Grant Writer	\$30.00	22200	\$666,000.00
ED	Grant Writer	\$30.00	120000	\$3,600,000.00
HHS	Grant Writer	\$30.00	3727980	\$111,839,400.00
NARA	Grant Writer	\$30.00	60	\$1,800.00
NASA	Grant Writer	\$30.00	6,120	\$183,600.00
NRC	Grant Writer	\$30.00	120	\$3,600.00
NSF	Grant Writer	\$30.00	60060	\$1,801,800.00
USAID	Grant Writer	\$30.00	540	\$16,200.00
USDA	Grant Writer	\$30.00	380,940	\$11,428,200.00
TOTAL			5,854,860	\$175,645,800.00

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 \$175,645,800.

13. Capital Costs

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the R&R collection. 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 collection is based on revisions to the R&R collection currently in use. There is no projected incremental increase in the cost burden to the Federal Government with the implementation of the revised R&R collection. Each agency currently has existing personnel, systems and processes (or other resources) in place to receive and review their grant applications.

Agency personnel time to review the form is estimated at 1.3 hours per form. Based on 97,581 responses per year the total Burden Hours on Agency Personnel is (97,581 x 1.3 hours) 126,855 hours.

Grants administrative personnel generally are in the GS-9 through GS-15 range. Based on a step one average of these grades, an average hourly salary is \$39 per hour.

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
97,581	1.3	126,855	\$39	\$4,947,356.70

Therefore, 97,581 annual applications = \$4,947,356 of estimated annual cost to the federal government to review the form.

15. Program or Burden Change

None.

16. Publication and Tabulation Dates

Not applicable.

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.