

OMB Forms Justification Package
Nonprofit Capacity Building Program
Progress Report

PART A: JUSTIFICATION

- A1. 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 purpose of the Nonprofit Capacity Building Program is to increase the capacity of a small number of intermediary grantees to provide specific assistance to improve the sustainability of and expand services provided by small and midsize nonprofits in communities facing resource hardship challenges. The Progress Report is completed semi-annually by Nonprofit Capacity Building Program Grantees to summarize project accomplishments, challenges, resources generated, and progress toward achieving project goals and objectives. Authorized by and subject to the National and Community Service Act of 1990, as amended by the Serve America Act (the “NCSA”), codified as 42 U.S.C. 12501 et seq. Awardees must comply with the requirements of the Act and its implementing regulations.

- A2. Indicate how, by whom, and for what purposes 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 Progress Report is completed semi-annually by Nonprofit Capacity Building Program Grantees to summarize project accomplishments, challenges, resources generated, and progress toward achieving project goals and objectives. The Progress Report consists of two parts: a Progress Report Narrative and a Performance Measurement Reporting Workbook. The Corporation will also use the information to evaluate progress toward achieving project goals and objectives and identify areas in which a grant recipient may need training and technical assistance.

- A3. 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.**

The Corporation will use electronic mail system for grantees to submit the Progress Report Documents.

- A4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There are no other sources of information by which the Corporation can meet the purpose described in A2.

- A5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.**

This collection of information does not impact small businesses since they are not eligible to apply for the grant. Economic burden to other small entities is limited to the cost of staff time to develop and submit the progress report. This is minimized to the degree possible by asking only for the information absolutely necessary to make responsible decisions on progress toward achieving project goals and objectives and identify areas in which a grant recipient may need training and technical assistance.

- A6. 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 obstacle to reducing burden.**

The Corporation would not be able to effectively monitoring the progress toward goals and objectives of the Nonprofit Capacity Building grantees.

- A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that (a) required respondents to report information to the agency more often than quarterly; (b) requires respondents to prepare written response to a collection of information in fewer than 30 days after receipt of it; (c) requires respondents to submit more than an original and two copies of any document; (d) requires respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax record for more than three years; (e) in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study; (f) requires the use of a statistical data classification that has not been reviewed and approved by OMB; (g) 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 (h) requires respondents to submit proprietary trade secret, 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.**

There are no special circumstances that will require information to be collected in a manner that is not consistent with the requirements outlined above.

- A8. 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 the notice and describe actions taken by the agency in response to the comments.**

The 60 day Federal Register *Notice* soliciting comments was published on Thursday, October 20, 2011 on page 65184. Public comments were received from two Corporation grantees for this Notice. The general consensus of comments related to the challenge of tracking the output measures of the general recipients by focus areas and a need to include information on organizational support of the program. The Corporation gave full consideration to those comments and incorporated their suggested changes into the Progress Report.

- A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There will be no payments or gifts to respondents.

- A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Information provided by this collection may be shared with federal, state, and local agencies for law enforcement purposes. Information provided by respondents is subject to the Privacy Act and includes a Privacy Act Notice.

- A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other behaviors that are commonly considered private.**

The proposed data collection does not include any questions of a sensitive nature.

- A12. Provide estimates of the hour burden of the collection of information. The statement should: (a) indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of expected hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. (b) if this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in line 13 of OMB Form 83-1. (c) provide estimates of annualized costs to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out**

or paying outside parties for information collection activities should not be included here. Instead this cost should be included in item 14.

The total hour burden is estimated at 150 hours. The Progress Report is completed semi-annually by 15 Nonprofit Capacity Building Grantees. The frequency of response is twice per year and should average 10 hours of effort per respondent for each submission. There is no estimated annual hour burden outside of the customary and usual business practices.

A13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burdens shown in Items 12 and 14.

There is no actual annual cost burden to respondents resulting from this information collection activity.

A14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

There are no additional costs to the Government.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

Not Applicable.

A16. 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.

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

A17. 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 Corporation is not seeking this approval. The expiration date will be displayed on the application instructions.

A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-1.

There are no exceptions to the certification statement in Item 19.