U.S. Department of Commerce
National Telecommunications and Information Administration
State Broadband Data and Development Grant Program Progress Report
OMB CONTROL No. 0660-0034

JUSTIFICATION

This request is to revise the currently approved information collection format for quarterly performance information provided by grant recipients. The revised format will help reduce reporting burden on recipients and improve NTIA monitoring efforts by: 1) clarifying and adding several minor questions to assist in ensuring better and more accurate responses from recipients; 2) reducing the frequency with which some information is reported (e.g., data-related questions); and 3) removing questions that are not necessary for performance monitoring.

1. **Explain the circumstances that make the collection of information necessary**.

Background:

Section 6001(l) of the American Recovery and Reinvestment Act of 2009 (Recovery Act), Pub. L. No. 111-5 (2009), requires the Assistant Secretary of Commerce for Communications and Information (Assistant Secretary) to develop and maintain a comprehensive, interactive, and searchable nationwide inventory map of existing broadband service capability and availability in the United States that depicts the geographic extent to which broadband service capability is deployed and available from a commercial or public provider throughout each state.[1] The statute further provides that the Assistant Secretary will make the national broadband map accessible by the public on the NTIA web site no later than February 17, 2011.[2] The Recovery Act authorizes NTIA to expend up to $350 million pursuant to the Broadband Data Improvement Act (BDIA), Title I of Public Law No. 110-385, 122 Stat. 4096 (Oct. 10, 2008), and for the purposes of developing and maintaining a broadband inventory map.[3]

On July 8, 2009, NTIA issued the Notice of Funds Availability (NOFA) and Solicitation of Applications for the State Broadband Data and Development (SBDD) Grant Program setting forth the requirements for this competitive grant program (74 FR 32545; July 8, 2009). NTIA issued subsequent clarifications on August 12, 2009 (74 FR 40569) and September 10, 2009 (74 FR 46573). The NOFA requires awardees to submit regular reports to NTIA. Specifically, it states:

> All awardees under this Program will provide quarterly reports on:

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[1] Recovery Act § 6001(l), 123 Stat. at 516. See Section IV for the definition of "state" and other relevant definitions.
[2] *Id.*
[3] Recovery Act at Div. A, 123 Stat. at 14.

(a) achievement of project goals, objectives, and milestones (e.g., collection of a "substantially complete data set"; completion of data review or quality control process) as set forth by the applicant in their application timeline;

      i. expenditure of grant funds and how much of the award remains;

      ii. amount of non-federal cash or in-kind investment that is being added to complete the project; and

      iii. whether the awardee is on schedule to provide broadband-related data in accordance with the mapping project timeline. See 74 FR 32556 (July, 8, 2009).

Based upon this guidance, NTIA has developed a form, Performance Progress Report (PPR), which will better allow the SBDD Grant Program to evaluate the progress of awardees. To date, NTIA had utilized the OMB-approved quarterly PPRs to capture quarterly information related to each project. Each report provides updates on project milestones and key performance indicators that allow NTIA to measure a project's progress and ensure proper monitoring and compliance with program rules.

Proposed Action (Revision):

After reviewing recent PPRs, NTIA identified a need to revise its existing PPRs by making changes to existing questions to improve clarity, adding questions, reducing the frequency with which some information is reported, and deleting certain items that are not necessary for performance monitoring. The revisions will improve recipients' responses and enable NTIA to better monitor and assess how the recipients are meeting program goals and milestones. The revisions fall into four categories:

- Clarifications: NTIA intends to clarify or make minor changes, none of which increase the combination of data elements originally approved.

- New Questions: NTIA intends to add four questions, all of which are designed to elicit better data for the Program Office as it monitors awards. NTIA will also begin collecting individual budgets. This is needed because when the original PPR was created there were only two projects, Data Collection and Planning. Since the original award, NTIA awarded additional funds to support sub-projects, such as Capacity Building and Technical Assistance. Accordingly, to ensure awardees stay within the budget approved at the time of the award, NTIA is requesting budgets and expenditures for each project.

- Deletions: NTIA intends to delete several data elements that are no longer useful or are collected elsewhere (e.g., ARRA and FFR report duplication).

- Reporting Reductions: NTIA intends to reduce reporting for certain data elements from quarterly to semi-annual. Specifically, these data elements are aligned with the semi-annual broadband data reporting that is currently submitted by recipients under OMB Control No. 0660-0032.

A chart of the proposed changes to the quarterly form is in ROCIS as Documents for IC.

2. Explain how, by whom, the frequency, and the purpose for which the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

NTIA's SBDD Grant Program Office will continue to collect performance reports from grantees quarterly. This information will be used so that the Program Office may effectively monitor awardees' performance and take timely action to ensure successful completion of each project and efficient use of Recovery Act funding.

NTIA will continue to make the quarterly PPRs available to the public through the NTIA website, pursuant to the Recovery Act. NTIA has taken special steps to ensure maximum utility, accuracy, integrity, and objectivity of the information to be collected in accordance with NTIA's published Information Quality Guidelines.[4] Federal Program Officers will verify the accuracy of performance reporting information submitted by recipients through monitoring activities (e.g., frequent communications with recipients, desk reviews, and site visits).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Recipients will continue to submit their quarterly PPRs through the existing Post-Award Monitoring (PAM) System. It is important to note that all recipients subject to this inquiry are already familiar with the system and are successfully utilizing it to meet current grant performance reporting requirements.

The PAM System also interfaces with National Institute of Standards and Technology (NIST) grant management systems. Using data from NIST, the system automatically populates relevant sections of the grant recipient reports so that recipients are not required to re-enter information that exists elsewhere.

If any recipients are unable to submit their reports online, NTIA will work with them to find alternative methods of submission.

4. Describe efforts to identify duplication.

The information is unique to each project and is not available elsewhere.
The recipients will continue to provide some of the same information that is also requested in the Recovery Act report, which is due several weeks earlier than the quarterly report. However, it

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[4] *See* Section 515 Standards: Guidelines for Ensuring and Maximizing Quality, Objective, Utility, and Integrity of Information Disseminated by the National Telecommunications and Information Administration, *available at* www.ntia.doc.gov/ntiahome/occ/ntiaiqguidelines_09252002.htm (Sept. 25, 2002).

would be more burdensome to attempt to combine the data from the two reports than it will be for recipients to copy and paste the same answer into both reports. Additionally, the revisions proposed here delete some of the Recovery Act report information that was previously required in the PPR.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize the burden.

NTIA has constructed this quarterly report to include only the minimum amount of information that the Program Office requires in order to effectively monitor these awards. Additionally, each recipient has received federal funds to implement their awards, and all awardees have included funds to ensure proper program management, including timely reporting to NTIA.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Without proper oversight of recipients' activities, NTIA will be unable to properly manage this program and will lack the tools necessary to ensure effective use of Recovery Act funding.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

This information collection will be conducted in a manner consistent with OMB guidelines.

8. Provide a copy of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A Federal Register Notice soliciting public comments was published on April 17, 2012 (Volume 77, pg. 22762). No comments were received in response to this notice.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not Applicable.

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

NTIA has not made any assurances of confidentiality to recipients with regard to the information submitted in the quarterly progress reports.

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 information collection does not contain any questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Number of Respondents: 56
Frequency of Response: Quarterly
Total Number of Responses Annually: 224
Estimated Number of Hours Per Response: 4
Estimated Total Annual Burden Hours: **896**

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

 Not Applicable.

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

The estimated annual cost to the government includes a small portion of the salaries and overhead of staff assigned to the program. Total staff time is not expected to exceed 224 hours per year, less than four percent of the time of each Program Staff member.

Estimation: 224 hrs X $45 per hour (based on GS-12 as an average NTIA staffer) = **$10,800**.

15. <u>Explain the reasons for any program changes or adjustments</u>.

NTIA has determined that the changes will not alter the estimated response time on the respondents thus no change in the burden hours.

16. <u>For collections whose results will be published, outline the plans for tabulation and publication</u>.

NTIA plans to post the final quarterly reports from each recipient on the NTIA website.

17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate</u>.

Not Applicable.

18. <u>Explain each exception to the certification statement</u>.

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.