

THE SUPPORTING STATEMENT

1. Circumstances Making the Collection of Information Necessary

This request is for a renewal of, and revision to, the current information collection (Uniform Project Description (UPD), 0970-0139) that will add statutorily mandated programs and content to the UPD. The complete list of programs is at Attachment A.

The Administration for Children and Families (ACF) is requesting an extension of the Uniform Project Description (UPD) (OMB Control number 0970-0139). The UPD is available for use by program offices to solicit the project description information for project grants and cooperative agreements. This approach consists of a menu of narratives that the program office from which the program office can select, as required, for a specific project or cooperative agreement funding opportunity announcement (FOA). Text options selected for use in a given FOA define the required project description portion to the grant applicant. The ability to pick and choose standard language that is appropriate for any given FOA reduces the burden associated with application preparation by eliminating irrelevant portions of the application for a given announcement. In addition, it provides consistency in the application review process.

Much of the information required in applications for project grants and cooperative agreements is required by HHS Uniform Administrative Requirements for Grants and Cooperative Agreements at the following citations: 45 CFR Part 74, 45 CFR Part 92, and other regulations, promulgated by A-110 and A-102 respectively. Please note that A-110 has now moved to 2 CFR Part 215. However, ACF continues to follow 45 CFR Part 74 until HHS regulations can be moved to 2 CFR. Copies of the relevant OMB Circulars can be found at Attachments D and E, respectively.

2. Purpose and Use of the Information Collection

Administration for Children and Families (ACF) Program Offices, grants management officials, and expert non-Federal and Federal panel reviewers use the collected information provided through grant applications to select and award discretionary grants. Program Offices use the information to ensure that Congress's intent of authorizing legislation will be implemented through any funded grant project and that applicant entities are eligible to receive grant funds.

Expert non-Federal and Federal objective review panelists score the information provided in applications as they evaluate applications in the context of the program announcements' published criteria to ensure that the best proposed projects are funded.

Grants management officials use the information collected to ensure appropriate Federal stewardship of Federal grant funds. This includes review of audits, CPA certifications that appropriate financial systems are in place and that proposed budgeted project costs are allowable, allocable and reasonable.

3. Use of Improved Information Technology and Burden Reduction

As of January 1, 2012, ACF requires electronic submission of grant applications through Grants.gov for all applicants, unless they have received a written exemption allowing them to submit in paper format. The electronic grant application submission process reduces the time and financial burden to the applicant, making the application process more efficient by eliminating delays and costs inherent in a paper-based manual process. At the time of its implementation, electronic submission of applications via Grants.gov was at 80 percent, an increase of 30 percent from the prior approval of the UPD, demonstrating the rapid acceptance and preference by applicants for electronic applications.

The electronic grant application process involves four functions. First, an interested party would use the FIND function at Grants.gov to identify a particular public assistance funding opportunity. Second, the application package would be downloaded over the Internet under APPLY at Grants.gov. Next, the applicant would prepare the application package offline and submit the application package electronically. Last, Grants.gov allows for the applicant to track the status of the submitted application.

Once an Authorized Organizational Representative (AOR) registers with Grants.gov as an AOR, the organization's registered E-Biz Point of Contact receives a notification and can authorize the AOR to submit grant applications through Grants.gov on behalf of the organization.

The UPD is installed as an element of an electronic FOA template that is part of a consolidated Announcement Module (AM) System in which ACF's FOAs are drafted, reviewed and approved, and published. The AM system keeps the content of the UPD fixed so that it does not vary from its approved format.

4. Efforts to Identify Duplication and Use of Similar Information

This is not applicable. Competitive applications are time and applicant specific. The Uniform Project Description provides a common way in which this information is collected to avoid duplicative efforts.

5. Impact on Small Businesses or Other Small Entities

The information requested is selected from the available text options in the UPD and assures the minimum amount needed to comply with program requirements. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate the unique program criteria.

6. Consequences of Collecting the Information Less Frequently

If this information is not collected, adequate data will not be available to evaluate the proposed projects and select the appropriate grantees. Reduced frequency is not possible as the annual frequency to solicit applications and make grant awards coincides with the annual appropriation of funds by Congress. Furthermore, not collecting applications for competitive projects would be inconsistent with Departmental policy and other authorities.

The consequence of requiring OMB review of individual program announcements would be to place additional stress on an already constrained annual grant cycle. The effect would be a delay in publishing FOAs and creating a need to shorten the time applicants have to prepare applications. Time for competitive review would also need to be compressed to allow for the award of grants by September 15 of each year. With the addition of new programs, these consequences will become more pronounced.

Applications are required for project grants and cooperative agreements as prescribed by regulations and other authorities, including OMB Circular A-102.

The UPD is fundamental to ACF's competitive award process. It ensures the provision of adequate information to support award decisions.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Proprietary trade secrets or other confidential information are addressed at element 10 with excerpts from the HHS Grants Policy Statement.

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A notice was placed in the Federal Register on April 11, 2012, (Volume 77, Number 70) page number 21,778, soliciting comments to the ACF. No comments were received; however, a request for the information collection was received and responded to by sending a copy of the UPD to the requester.

The active pool of ACF discretionary grantees includes approximately 3,000 educational and private nonprofit institutions; and State, Local or Tribal Governments. Through routine inquiry, pre-award, post-award and post grant close-out phases of grant administration, dialogue routinely occur between applicants and grantees. The substance and detail of the information collected is the focus of attention since it is the basis for award.

Because the grant establishes a relationship between ACF and the grantee, consultation with the community is a necessary and ongoing process.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts to applicants. The only remuneration is the grant payment dispersed to those entities awarded a grant.

10. Assurance of Confidentiality Provided to Respondents

Assurances of confidentiality necessary to inform the applicant of project grants and cooperative agreements are located in two specific places, Grants.gov and in HHS policy, which is incorporated in the HHS Grants Policy Statement (GPS). The following are excerpts from the relevant portions of those two sources:

Grants.gov

http://www.grants.gov/aboutgrants/privacy_policy.jsp

"Grants.gov privacy policy protects the rights of individual users under ... the 'Privacy Act', and other laws relevant to the protection of the privacy of an individual). All information is gathered, stored, and used in accordance with the above-mentioned Privacy Act.

Our privacy and security policy is clear: *We will collect no personal information about you when you visit our website unless you choose to provide that information to us.*

Here is how we handle information about your visit to our website:

Information Collected and Stored Automatically:

Grants.gov does not require a user to submit information to browse the Grants.gov site. The only users who are required to submit contact information are those users who wish to be authorized submitters on behalf of their organization, or users who wish to receive information directly from Grants.gov.

Grants.gov collects personal information about you (e.g., name, email address, phone number, title, username) only if you specifically and knowingly give it to us. If you consent to provide us with personal information (by providing feedback or by asking a question), we use that information to respond to your message and to help us get you the information you have requested. We only share the information you give us with other government agencies if your inquiry relates to that agency, or as otherwise required by law. Moreover, we do not create individual profiles with the information you provide or give it to any private organizations. We do not collect information for commercial marketing.

Grants.gov collects information to allow access for three types of users:

- Agency Users
- Authorized Organization Representatives
- Grants.gov Newsletter and Communication Notices Subscribers

All information collected and stored is in compliance with

the Paperwork Reduction Act. Any information submitted to Grants.gov through the application process will be stored in the Grants.gov system for a period of six months. Additionally, no one from Grants.gov will ever ask you for personal information, such as your Social Security number, banking, or credit card information.

When you browse, read pages or download information on Grants.gov, we automatically gather and store certain technical information about your visit. This information never identifies who you are. The information we collect and store about your visit is listed below:

- The Internet domain (e.g., "xcompany.com" if you use a private Internet access account, or "yourschool.edu" if you connect from a university's domain) and IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you access our website;
- The type of browser (e.g., Netscape, Internet Explorer) and operating system (e.g., Windows, Unix) used to access our website;
- The date and time you access our website;
- The pages you visit; and
- If you linked to the Grants.gov website from another website, the address of the website.

This information is only used to help us make the site more useful for you. With this data we learn about the number of visitors to our site and the types of technology our visitors use. We never track or record information about individuals and their visits.

HHS Grants Policy Statement

ACF displays a link to the HHS Grants Policy Statement (GPS), the consolidated terms and conditions for all HHS awards, on the ACF / ACF Funding Opportunities / Forms web page. Sections from the GPS appear below that address proprietary and confidential information:

Use of Application Information

Applicants are discouraged from submitting information considered proprietary unless it is deemed essential for proper evaluation of the application. However, if the

application contains information that the applicant organization considers to be trade secrets, information that is commercial or financial, or information that is privileged or confidential, the pages containing that information should be identified as specified in the funding opportunity announcement or application instructions.

When non-Federal reviewers are used, the funding opportunity announcement or application instructions will specify that applicants have the option of omitting specific salary rates or amounts for individuals specified in the application budget and, if required by the OPDIV, Social Security numbers for individuals. For hard-copy applications, this can be accomplished by including the information in the original, but omitting it from the application copies. The copies may include summary salary information. For electronic applications, the information must be supplied to the OPDIV as part of the submission. The funding opportunity announcement will specify if the applicant should indicate, in the application or in a separate form, whether it wants to use that option. If the detailed information is an integral part of the application, the OPDIV will ensure that the information is not shared with reviewers.

The OPDIV will protect the information contained in an application from unauthorized disclosure, consistent with the need for objective review of the application and the requirements of the Freedom of Information Act and the Privacy Act. However, if a grant is awarded as a result of or in connection with an application, the Federal government has the right to use or disclose the information to the extent authorized by law. Post-award considerations concerning release of information and access to research data are addressed in Part II of this policy statement.

Privacy Act

The Privacy Act of 1974, 5 U.S.C. 552a, and its implementing regulations (45 CFR part 5b) provide certain safeguards for information about individuals maintained in a system of records (i.e., information may be retrieved by the individual's name or other identifying information). These safeguards include the rights of individuals to determine what information about them is maintained in Federal agencies' files (hard copy or electronic) and how it is used; to have access to such records; and to correct, amend, or request deletion of information in their records that is

inaccurate, irrelevant, or outdated.

Records maintained by OPDIVs with respect to grant applications, grant awards, and the administration of grants may be subject to the provisions of the Privacy Act. For example, OPDIVs that maintain or access any such records by name of an individual, such as by the name of the PI/PD, are subject to the Privacy Act.

Parties other than PIs/PDs may request the release of Privacy Act records. Such requests are processed in the same manner as FOIA requests. For example, information requested by co-investigators in grant applications is released to them only when required under FOIA because they have no right of access under the Privacy Act. When releasing information about an individual to a party other than that individual, OPDIVs will balance the individual's right to privacy with the public's right to know as provided by the FOIA.

11. Justification for Sensitive Questions

Questions of a sensitive nature are not asked. Please refer to the UPD narratives.

12. Estimates of Annualized Burden Hours and Costs

This request is for authorization to use the UPD for 46 statutorily mandated ACF programs for project grants and cooperative agreements.

The ACF estimates 5,519 applications will be submitted annually. On average the burden hours per response is 60 hours. Frequency is once when the applications are solicited through the FOA. Therefore, the total hourly burden annually is expected to be 331,140 hours. Hourly burden for the SF 424 series of forms is covered under a separate OMB information collection clearance.

Total annualized dollar cost based on hourly burden, based on \$35 per hour burdened, is \$11,589,900 ($\$35 \times 331,140$ hours).

Instrument	Number or Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours
UPD	5,519	1	60	331,140

A copy of programs with their associated burden can be found at Attachment A.

The monetary value of this time is 331,140 hours times \$50 per hour or \$16,557,000.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Not applicable. Applicants for project grants and cooperative agreements develop applications using current employees who have an in-depth knowledge of the organization's capabilities and finances. This applies to total capital and start-up, total operation and maintenance, and purchase of services costs. In summary, there are no direct (incremental) monetary costs to respondents other than their time to prepare the applications. Information on the monetization of those costs are provided above under A.12

14. Annualized Cost to the Federal Government

It is estimated that, on average, there are 20 hours of labor on the part of government employees to develop the request package and Federal Register notices. The average annual number of applications is 5,519 which equates to 110,380 hours of staff time. Based on an average of \$50 per hour, in monetary terms this equates to \$5,519,000. Therefore, approval of this request represents a savings to the Federal Government.

The competitive review is performed by outside reviewers, which incurs costs to the Federal Government with, or

without, the UPD.

15. Explanation for Program Changes or Adjustments

Program changes are caused by the elimination of eleven programs and the addition of four new programs.

There is an adjustment due to an average revised estimate of 60 hours per response that replaces the current average estimate of 40 hours per response.

The net difference in responses is 8,266 currently and 5,519 in the current request for a decrease of 2,747 responses. For burden hours, the current approval is 330,640 hours and the current request is for 331,140 hours for an increase of 500 burden hours. There is no cost burden on respondents.

These estimates were affected by an origination change. On April 18, 2012, Secretary Kathleen Sebelius announced a new organization within the Department of Health and Human Services – the “Administration for Community Living” (ACL). The ACL will include the efforts and achievements of the Administration on Developmental Disabilities (ADD), among others, in a single agency with the goal of increasing access to community supports and full participation, while focusing attention and resources on the unique needs of older Americans and people with disabilities. Therefore, CFDA Numbers associated with ADD, now Administration on Intellectual Developmental Disabilities (AIDD), an organizational component ACL, will no longer be counted as part of ACF’s annual burden hours for the UPD.

Four new programs were added in FY 2012:

93.060 Competitive Abstinence Education (CAE);

93.075 Systems Interoperability Health and Human Services;

93.076 TANF Program Integrity Innovation Grants;

93.092 Affordable Care Act (ACA) Personal Responsibility Education Program.

The UPD is undergoing several content revisions:

The text option for OBJECTIVES AND NEEDS FOR ASSISTANCE is clarified and its accompanying text box for program-specific examples is eliminated in lieu of an expanded generic description.

An additional option is provided for EVALUATION so that a distinction is made between the request for a plan for evaluating the funded program's performance, which focuses on a plan for ongoing monitoring, and the request for a plan to assess processes and progress towards achieving the goals and objectives of the funded project. Text boxes are available to allow for examples and details that would be specific to the funding program.

A new option requesting ADDITIONAL INFORMATION ON ELIGIBILITY allows the request of documents that are required, some by statute, to support an applicant's eligibility. These are documents that are in addition to an applicant organization's legal status.

Content previously requested under APPROACH is divided into two options, APPROACH and PROJECT TIMELINE AND MILESTONES. This change accurately reflects the distinction between the technical approach to the project and the project's management plan and timeline.

The content of the option for PROJECT SUSTAINABILITY PLAN is expanded to reflect an increased need for information that assesses an applicant organization ability to sustain programming after the end of Federal funding. Its use is limited to only longer-term projects.

Options are added to ORGANIZATIONAL CAPACITY so that the requested for information is more concise and specific. Requested information under DISSEMINATION PLAN is made more specific to better reflect the treatment of grant product.

A new option for selection is available to request agreements between members of a consortium, collaborative project, or interoperability project is added to THIRD-PARTY AGREEMENTS.

A new option requesting a PLAN FOR OVERSIGHT OF FEDERAL AWARD FUNDS is added, reflecting the need for more specific information on an applicant's capacity for stewardship of Federal funds.

Under the Project Budget and Budget Justification section, a text box is added to allow for reminders to applicants to include some specific costs, i.e. travel and per diem for grantees to attend mandatory meetings in Washington, DC. Other changes to the current options are corrections to grammatical errors and/or an effort to clarify requests to accommodate plain language practices.

16. Plans for Tabulation and Publication and Project Time Schedule

Information in grant applications will not be published. . The disclosure of information in grant applications is regulated by, and subject to, The Freedom of Information Act (FOIA) and The Privacy Act of 1974.

The most significant exemptions from disclosure of grant application information are 4 and 5 in the FOIA. Exemption 4 protects from public disclosure of two types of information: trade secrets and commercial or financial information obtained that is privileged or confidential. Exemption 5 applies to internal government documents and permits the withholding of internal recommendations, advisory opinions, and materials used for evaluation.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

There will be no exceptions to the practice of displaying the expiration date. The display of the expiration date for OMB approval on a program narrative will never be considered inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.

B. Statistical Methods (used for collection of information employing statistical methods)

Statistical methods are not used since there is no attempt to draw inferences about a population. The applications received are the universe.