

Supporting Statement for Paperwork Reduction Act

“Section 1512 Data Elements – Federal Financial Assistance” for Reports under Section 1512 of the American Recovery and Reinvestment Act of 2009, Public Law 111-5

A. Justification.

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

Section 1512 of the American Recovery and Reinvestment Act of 2009 (“Recovery Act”) requires recipients of Recovery Act funds to report on the use of funds. These reports are to be submitted to FederalReporting.gov, and certain information from these reports is later posted publically.

Information related to the use of federal financial assistance described in Section 1512 of the Recovery Act is captured in the “Section 1512 Data Elements – Federal Financial Assistance.” Additional information captured in “Section 1512 Data Elements – Federal Financial Assistance” is not specifically described in Section 1512, but is set forth in OMB Guidance dated June 22, 2009, and December 18, 2009, and is needed to identify the award, the recipient of the award, and/or the activity being funded.

This collection pertains only to recipients of federal financial assistance.

2. Purpose and Use of the Information Collection

The Recovery Act requires recipients of Recovery funds to report on the use of those funds. Under the Recovery Act, the data collected is to be transparent and therefore made available to the public. Additional information regarding purpose and use of the information collected is reflected in the current applicable Privacy Act System of Record Notice. The most recent version is published in the Federal Register at 76 Fed. Reg. 27103.

3. Use of Improved Information Technology and Burden Reduction

Automated collection of the Section 1512 data and information makes it easier for the collection, synthesizing, and reporting of data to the public. Common elements across forms and programs improves Section 1512 data reporting by providing recipients with a single face across programs and agencies.

Electronic reporting supports the “pre-population” of forms in that much data from the initial collection is copied forward into subsequent required quarterly reports, thereby lessening the reporting burden of recipients.

4. Efforts to Identify Duplication and Use of Similar Information

The “Section 1512 Data Elements – Federal Financial Assistance” provides uniformity in the collection of performance information and results in fewer unique interpretations of the information collection instruments. OMB has cleared hundreds of grant-related performance reporting forms to date, which has resulted in considerable reporting burden on grantees, particularly when grantees receive funding from more than one Federal program. This collection, required by the Recovery Act and OMB guidance, results in a considerably less complex reporting burden on the recipients.

5. Impact on Small Businesses or Other Small Entities

Regarding any impact on small businesses, the standard data set used in this information collection is a streamlined and uniform list of data elements. Use of this data set places a minimal reporting burden on recipients of assistance funds of any size. Section 1512 generally requires the reporting of information on the use of Recovery Act funds, including detailed information on certain subgrant and subcontract awards and limited information on certain vendor payments that are not part of subgrant and subcontract awards. Notably, any impact on subrecipients would be felt only by those that are required by the prime recipients to report the information (prime recipients have the option of reporting the information themselves). Additionally, recipients are allowed to report aggregate award information if the subentity receives an award below \$25,000 (Section 1512(c)(4) of the Recovery Act). Recipients who use this option may reduce the reporting burden on small entities that may be receiving small awards (i.e., under \$25,000).

6. Consequences of Collecting the Information Less Frequently

Since the reporting frequency specified in Sections 1512 of the Recovery Act is quarterly, the consequences of assistance recipients not reporting on performance could range from an agency suspending the current award to an agency terminating the award. Attached is the language of Section 1512, which states requirements for reporting on use of funds. These requirements are to be part of the award terms and conditions, pursuant to 2 CFR Part 176.

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

The “Section 1512 Data Elements – Federal Financial Assistance” under Section 1512 of the American Recovery and Reinvestment Act of 2009, Public Law 111-5 does not require special circumstances.

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

The 60-day notice and request for comments was published in the Federal Register on March 29, 2013, 78 Fed. Reg. 19333, and interested persons were invited to submit comments on or before May 28, 2013. No comments on this proposed information collection activity were received. The 30-day notice was published in the Federal Register on July 5, 2013, 78 Fed. Reg. 40522, and written comments are due to be submitted to OMB by August 5, 2013.

9. Explanation of Any Payment or Gift to Respondents

“Section 1512 Data Elements – Federal Financial Assistance” does not involve a payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

Section 1512 data and information is collected in a secure system environment. However, the Section 1512 data elements reported will be posted for public viewing.

11. Justification for Sensitive Questions

The “Section 1512 Data Elements – Federal Financial Assistance” currently does not include questions of a sensitive nature. Any agency that may desire inclusion of such questions will require a separate request to OMB.

12. Estimates of Annualized Burden Hours and Costs

Estimates are based on an analysis of historical trends spanning 14 quarters of Recovery Act reporting. As reflected below, the Estimated Average Burden Hours per Response has been reduced from 8.50 to 6.58 as a result of data on the frequency of subrecipients reporting in lieu of prime recipients on subrecipient information. This also resulted in a relative increase in the number of Estimated Number of Respondents, although the overall Estimated Number of Respondents has decreased consistent with historical trends. Estimates of average burden

hours per response also incorporate the fact that a copy-forward feature applied to FederalReporting.gov eliminates the need to re-enter most of the Section 1512 data each quarter.

Estimated Number of Annual Responses	Frequency of Response	Estimated Average Burden Hours per Response	Total Annual Burden Hours
24,356	4	6.58	160,263

Using the average hourly cost equivalent figure that was utilized in the Board’s earlier “Section 1512 Data Elements – Federal Financial Assistance” information collection request (approved July 12, 2010), which was \$68.00 per hour, the total cost equivalent of the information collection would equal \$10,897,848.

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

Current reporting requirements are contained in the award terms and conditions of the grant or other assistance agreement, and the “Section 1512 Data Elements – Federal Financial Assistance” does not require additional respondent recordkeeping. Much of the data will be “pre-populated” for the respondent, based on the DUNS number and specific grant award identifier. Further, after a respondent first reports on an award, many of the requisite data elements will be copied forward, pre-populating the form for subsequent reporting periods.

14. Annualized Cost to the Federal Government

The cost associated with “Section 1512 Data Elements – Federal Financial Assistance” is already incorporated into the costs of operating and maintaining the entire FederalReporting.gov system, which is estimated to cost approximately \$1,000,000 per year.

15. Explanation for Program Changes or Adjustments

N/A – Operating costs of FederalReporting.gov system will be reduced due to previously sunk costs and a declining estimated number of respondents, which is also reflected above. Additionally, as described in Section 12 herein, the Estimated Average Burden Hours per Response is being reduced as a result of data on subrecipient reporting frequency; however, there are no substantive program changes or adjustments.

16. For collections of information whose results are planned to 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, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

As set forth in the Recovery Act and OMB guidance, data collected pursuant to Section 1512 will be made available for the public to use and analyze.

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

N/A.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

N/A.