

# **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

## ***Iran Program Grants Vetting*** **OMB Number 1405-0176** ***DS-4100***

### **A. JUSTIFICATION**

1. Awarding grants is a key component of the State Department's Iran policy. As a condition of licensing these activities, the Office of Foreign Assets Control (OFAC) has requested the Department of State to follow certain procedures to effectuate the goals of Sections 481(b), 531(a), 571, 582, and 635(b) of the Foreign Assistance Act of 1961 (as amended); 18 U.S.C. §§ 2339A and 2339N; Executive Order 13224; and Homeland Security Presidential Directive 6. These licensing conditions mandate that the Department conduct a vetting of potential Iran programs grantees and sub-grantees for counter-terrorism purposes. To conduct this vetting, the Department envisions collecting information from grantees and sub-grantees regarding the identity and background of their key employees, board of directors, and program participants.
2. As noted above, this information is collected as part of procedures to effectuate the goals of Sections 481(b), 531(a), 571, 582, and 635(b) of the Foreign Assistance Act of 1961 amended; 18 U.S.C. LL 2339A and 2339B; Executive Order 13224; and Homeland Security Presidential Directive 6. The Department's Bureau of Near Eastern Affairs (NEA), Bureau of Democracy, Human Rights and Labor (DRL), and Bureau of Educational and Cultural Affairs (ECA), in conjunction with the Bureau of Intelligence and Research (INR) will primarily collect and use the data. Should individuals pass vetting, grantees and sub-grantees whose data is collected will implement critical programs to promote principles of human rights, democracy, governance, rule of law, and Internet freedom for the Iranian people. Not collecting this information may permit those involved in terrorist financing, or supporting terrorism, to gain access to U.S. Government funds.
3. We send the form to applicants, usually via email. The form may be completed electronically and then printed, or printed and filled out by hand. The applicant may print the form, scan it, and then submit the scan by e-mail or fax; or electronically fill out and submit

the form. Typically, the applicant will complete the form, scan it and forward it by e-mail. Original documents received from the applicant are then processed and locked in our vetting safe.

4. The information collected is not duplicative of other information collections.
5. This collection of information impacts U.S. small businesses or other small entities to the extent that they must provide information to obtain Federal grants.
6. Not collecting this information may permit those involved in terrorist financing, or supporting terrorism, to gain access to U.S. Government funds.
7. There are no special circumstances.
8. A 60-day notice soliciting public comments was published in the Federal Register on March 12, 2012 on pages 15798-15799. No comments were received.
9. The Department does not make any type or form of payment to the respondent for the information other than the awarding of monies to grantees.
10. Information relevant to the vetting of Iran program grantees will be maintained in accordance with Privacy Act provisions, to the extent the Act is applicable. The information will not be made available to the public, unless required by law. Appropriate measures will be taken to assess the credibility of the information obtained. A Privacy Act Statement is incorporated into the reporting document. Data provided will be checked against relevant and appropriate databases. If derogatory information is identified, a review and assessment of its reliability will be conducted by officials in the affected Bureau, who will either: (i) instruct the action officer to take appropriate action with respect to the funding request; or (ii) in those cases where interagency consultation may be useful or desired before the affected Bureau formulates a final decision, request further consultation with appropriate Agencies/Departments before rendering a decision. All records used or generated in this process will be maintained in accordance with an appropriate Privacy Act system of records notice. If determined to be reliable, appropriate action with respect to the funding request will be taken. This in-house screening process provides safeguards to make sure that applicants are screened in such a manner as to prevent a denial of application because of false

or incorrect reporting or screening data. This information collection tool is covered by State-08.

11. The form does not request information of a sensitive nature.
12. The burden estimate below is based upon on information provided by grantees. The burden hours are unique to our program and would not include burden hours for customary and usual business practices. Assuming an applicant makes \$50,000-\$100,000 per year, and it takes him one hour to complete the form, and factoring in overhead by multiplying one hour's worth (\$37.50) of the mean salary of an applicant (\$75,000 per year) by 1.4, the total financial burden on an applicant is \$52.50. There are 200 respondents annually, thus the total hour burden cost is \$52.50 multiplied by 200, which is \$10,500. There is no additional cost to respondents for the collections of this information beyond the hour burden.

The following data was used in the preparation of the hour burden:

- a. Number of Respondents: 200
  - b. Number of Responses: 200
  - c. Frequency of Response: On occasion.
  - d. Estimated form completion time: 1 hour
  - e. Annual hour burden: 200
13. There are no costs to respondents associated with this collection.
  14. The cost to the Federal Government is calculated by determining the number of hours that it takes to process the information collection. Typically, it would take a GS-13 employee approximately one hour to process the form. A GS-13 hourly wage (\$46.33) multiplied by 1.4 for overhead costs multiplied by 200 (number of respondents) yields a total cost to the Federal Government of \$12,972.
  15. There are no program changes associated with this collection.
  16. The information collected will not be published.
  17. All information collections will display the expiration date for OMB approval.
  18. No exceptions to the certification statement are requested

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.