

Supporting Statement
Data Collection Form for Application for Federal Assistance
SF-424 Project/Performance Site Location(s) Form

In compliance with section 3507(a)(1)(D) of the Paperwork Reduction Act of 1995, the Electronic Government Office (EGOV), Department of Health and Human Services, has submitted an Information Collection Request (ICR), described below, to the Office of Management and Budget (OMB) for review and approval. The ICR is for reinstatement of a previously-approved information collection assigned OMB control number 4040-0010, which expired on August 31, 2011. The ICR also requests categorizing the form as a common form, meaning HHS will only request approval for its own use of the form rather than aggregating the burden estimate across all Federal Agencies as was done for previous actions on this OMB control number. The SF-424 Project Abstract form and the SF-424 Key Contacts form were previously assigned to OMB control number [4040-0003](#). EGOV seeks to move these two instruments to the OMB control number [4040-0010](#). Comments submitted during the first public review of this ICR will be provided to OMB. OMB will accept further comments from the public on this ICR during the review and approval period.

This new form will be utilized by 26 Federal grant making agencies. HHS requests that 4040-0010 be cleared as a common form. Each agency will be required to report their burden hours to OMB in addition to requesting use of the IC. The 4040-0010 collection expired on August 31, 2011. We are requesting reinstatement of the form with a three-year clearance.

A. Justification

1. Need and Legal Basis

On an annual basis, the Federal government commits nearly twenty percent of the Federal budget, or approximately \$400 billion, to State and Local governments, Tribal organizations, education and research institutions, non-profit organizations, public housing authorities, commercial organizations, and individuals through the awarding of grants and cooperative agreements. There are 26 Federal grant-making agencies and organizations sponsoring and administering over 900 programs. More than half of these Federal agencies and grant-making organizations have discretionary programs authorized by legislation covering a broad range of subject matter. To obtain Federal grant and cooperative agreement awards, applicant organizations must apply to the Federal agency or organization responsible for administering the program.

The Federal Grant and Cooperative Agreement Act of 1977 (31 USC 6301-6308) gives agencies the authority to select the appropriate award instrument within the limits of their program legislation to support or stimulate recipient activity. Public Law (P.L.) 106-107, the Federal Financial Assistance Management Improvement Act of 1999, was enacted to improve the effectiveness and performance of Federal

financial assistance programs, simplify and streamline Federal financial assistance application process and reporting requirements, and improve the delivery of services to the public. The issuance of the President's Management Agenda in 2002 called for "agencies to allow applicants for Federal grants to apply for, and ultimately manage, grant funds online through a common web site, simplifying grants management and eliminating redundancies..."

In its memorandum to agencies, (<http://www.whitehouse.gov/omb/memoranda/fy04/m04-05.html>); OMB established Grants.gov as the Federal government's single, online portal for any person, business, or State, Local and Tribal government to find and apply for Federal grants, regardless of type.

The Federal Funding Accountability and transparency Act (FFATA) was signed into law on September 26, 2006 (P.L. 109-282). The legislation requires the Office of Management and Budget (OMB) to establish a publicly available, online database containing information about entities that are awarded federal grants, loans, and contracts. The changes in the SF-424 (Site Location) form will enable agencies in collecting the FFATA required data elements for the database through the SF-424 applications. Required data elements include the primary location of performance and the DUNS number associated with the organization where the project will be performed.

2. Information Users

The forms comprising 4040-0010 IC will enable Federal grant-making agencies to collect that have not previously been collected within the majority of the SF-424 form collections.

Federal agencies will identify the form as a required form in their grant application instructions. Agencies will incorporate the revised form into their processes for reviewing the applications and awarding grant funds. These processes are reflected in agencies' policies and procedures documents. Agencies will also maintain and store application forms and data in accordance with their policies and practices. The public that will use the form includes: Federal, State, local, or tribal governments, business or other for profit, not for profit institutions, and individuals or households (if required by the grantor agency).

3. Improved Information Technology

The Grants.gov Apply mechanism (<http://www.grants.gov/Apply>), which was deployed in October 2003, allows applicants to electronically find and apply for Federal grants. In its January 7, 2004 memorandum, OMB directed Federal grant-making agencies to use the Grants.gov Apply mechanism (<http://www.whitehouse.gov/omb/memoranda/fy04/m04-05.html>). Information on the SF-424 (Site Location) form will be entered into fillable forms and submitted electronically through the Grants.gov portal. Applicants can complete application forms that they download from Grants.gov and submit them in accordance with agency policies and instructions. Agency policies and instructions include detailed

submission guidance such as due dates, eligibility, information requirements, supporting documentation, etc. Upon receipt of the application, Grants.gov will send an electronic acknowledgement to the applicant that the submission was received with the date and time of receipt. In addition, Grants.gov will deliver the application to the agency.

4. Duplication of Similar Information

The 4040-0010 ICs do not collect all of the FFATA required data elements from applicants. This information collection also implements streamlining and simplification provisions of PL 106-107 and provides support for the President's Management Agenda to allow applicants for Federal grants to apply for grant funds online. A cross-agency work group developed the proposed forms and data set that will serve as a common form for various grant programs.

5. Small Businesses

The form is designed to collect the minimum amount of information necessary to comply with the FFATA requirements and is based on a previously OMB approved form.

6. Less Frequent Collection

The 4040-0010 IC will provide information required by FFATA. Collection frequency will vary each period based on grant applications and proposals each institution submits. If the collection is not conducted or conducted less frequently, Federal grant-making agencies will not be able to collect all of the data elements required for FFATA compliance and make information about entities that receive Federal grants, loans, and contracts available through the publicly available, online database. Additionally, a significant PL 106-107 grants streamlining and simplification opportunity will be missed and progress towards fully achieving the President's Management Agenda to allow applicants for Federal grants to apply for grant funds online would be impeded if the SF-424 (Site Location) were not used.

7. Special Circumstances

The proposed collection of information will be conducted in a manner that complies with relevant legislation authorizing Federal grants programs, OMB policies related to the administration of Federal grants including OMB Circulars A-102, A-110 (relocated to Relocated to 2 CFR 215), A-21 (relocated to 2 CFR 220), A-87 (relocated to 2 CFR 225), and A-122 (relocated to 2 CFR 230), and guidelines of 5 CFR 1320.5(d)(2).

8. Federal Register Notice/Outside Consultation

On March 6, 2013, the Grants.gov Program Management Office, one of the 26 E-Government initiatives, managed by HHS, published the proposed 4040-0010 for public comment in the *Federal Register* (**78 FR 14552**). Interested individuals were invited to send comments regarding any aspect of this collection of information. No comments were received.

9. Payment/Gift to Respondents

Not applicable since there is no payment to respondents, other than remuneration of grantees.

10. Confidentiality

The grant-making agencies will maintain the authoritative copy of all application materials and data. Collection of information will be consistent with OMB policies related to the administration of Federal grants as well as agency policies and practices for access to electronic and paper records. If application forms are submitted through the Grants.gov Apply mechanism, Grants.gov will maintain only transmission records pertaining to the files. Grants.gov will not maintain application materials and data.

11. Sensitive Questions

Not applicable since there are no sensitive questions.

12. Burden Estimate

Section A. Estimated Annualized Burden Hours to Respondents

The estimated Annualized Burden Hours to Respondents reflects utilization of the 4040-0010 IC by The Department of Human Services. All other Federal agencies must request use of this common form from OMB and report their burden hours.

SF-424 4040-0010 Estimated Annualized Burden to Respondents

Agency	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response in Hours	Total Burden Hours
HHS	137,818	1	1	0.5	68,909
TOTAL	137,818		0		68,909

Section B. Burden Cost

SF-424 4040-0010 Estimated Annualized Cost to Respondents

Agency	Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
HHS	Grant Writer	68,909	\$30	
TOTAL		68,909		\$2,067,270

13. Capital Costs

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the 4040-0010 collection. It should be noted that many applicant organizations already have systems in place to respond to OMB's guidance to Federal grant-making agencies to use the Grants.gov "Apply" mechanism, which encourages the electronic submission of grants applications.

14. Cost to the Federal Government

There is no projected incremental increase in the cost burden to the Federal Government with the implementation of the 4040-0010. Each agency currently has existing personnel, systems and processes (or other resources) in place to receive and review their grant applications.

Agency personnel time to review the form is estimated at 15 minutes per form. Based on 68,909 responses per year.

Grants administrative personnel generally are in the GS-9, 11, 12, 13, 14, and 15 range. Based on a step five average of these grades, an average hourly salary is \$42.76 per hour. $(\$42.76/60 \text{ minutes})(15 \text{ minutes})(68,909) = \$736,637$.

15. Program or Burden Changes

This is a request for reinstatement of a previously-approved collection, which expired on March 31, 2012, with a three-year clearance. No program changes or revisions have been implemented with this IC.

16. Publication and Tabulation Dates

There are no publication plans for collected data including summarizing or tabulating by Grants.gov. The federal agencies that use the form may use the data collected to provide information as required to OMB in accordance with the Federal Funding Accountability and Transparency Act.

17. Expiration Date

Three years from OMB approval.

18. Certification Statement

Not applicable since there are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed in this information collection.