

**SUPPORTING STATEMENT
OMB Control Number 2700-0047**

Type of Clearance: Reinstatement with Change of a Previously Approved Information Collection

Title of Information Collection: Property Inventory Report – Grants with Educational and Nonprofit Entities (formerly titled Property Inventory Report)

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This collection is required to ensure proper accounting of Federal property provided under grants and cooperative agreements with institutions of higher education and other non-profit organizations, and to satisfy external requirements for internal control of property provided by NASA or acquired with NASA funds.

Reporting and recordkeeping are prescribed in 14 CFR.Part 1260.74, Grants and Cooperative Agreements.

The collection is necessary to comply with OMB Guidance for Grants and Cooperative Agreements, 2 CFR Chapter I and Chapter II.

2. Indicate how, by whom, how frequently, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information is submitted by recipients/grants and cooperative agreement awardees to document inventory of Government-owned property on an annual basis, at the end of the grant/agreement, or upon the occurrence of certain events.

The information is used by NASA to effectively maintain an appropriate internal control system for equipment and property provided or acquired under grants and cooperative agreements with institutions of higher education and other non-profit organizations, and to comply with statutory requirements, e.g., Chief Financial Officers Act) on the accountability of Federal funds.

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

forms of information technology. Also describe any consideration of using information technology to reduce burden.

NASA encourages recipients to use the latest computer technology in preparing documentation. Grant and Cooperative Agreement awardees submit annual property reports via an automated NASA form 1018 to the NASA Electronic Submission System (NESS).

4. Describe efforts to identify duplication.

Property and equipment records are unique for each grant and cooperative agreement. There is no known duplication of information.

5. If the collection of information impacts small businesses or other small entities (Item five of form OMB 83-I, the Paperwork Reduction Act Submission form), describe any methods used to minimize burden.

Small entities holding NASA grants or agreements must report Government-owned property in their possession. It is not possible to lessen the burden and still comply with the law.

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

Absence of information provided by grants and agreements would result in an inadequate internal control system, which would diminish accountability for items acquired with public funds.

7. Explain any special circumstances that would cause an information collection to be conducted in certain manners (as listed).

None

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR § 1320.8 (d), soliciting comments on the information collection before submission to OMB.

The 60-day FRN was published on Wednesday, January 29, 2014. Volume 79, Number 19, page 4760. One comment was received by email on February 18, 2014 from Mr. Jeffrey Warner/University of California, seeking clarification regarding the change. NASA responded to the public comment via email on March 6, 2014, as documented below:

From: Teel, Frances C. (HQ-JF000)

Sent: Thursday, March 06, 2014 6:37 PM

To: 'Jeffrey Warner'

Cc: Andrew Boulter; Wendy Streitz

Subject: Federal Register - 2014-01689 (OMB: 2700-0047; Property Inventory Report)

Hello Mr. Warner,

Thank you for your inquiry,

Changes to the information collection include:

-A change to the title to improve the description of the information collection.

-An estimate of the annual cost burden to respondents or record keepers for annual reports, additional close out reports when applicable, and recordkeeping.

Fran Teel

The 30-day FRN was published on Monday, June 16, 2014, volume 79, No 115. No comments were received from the public.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts or payments will be provided to grantees or cooperative agreement holders.

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

The confidentiality of this data is governed by statutes, the Freedom of Information Act, and agreement provisions and special conditions. The information collected relates to Government-owned property and does not require confidentiality.

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.

No sensitive questions are involved.

12. Provide estimates of the hour burden of the collection of information.

	Number of Respondents	Burden to read instruction, complete, and submit reports as well as record keeping	Total Burden Hours (number of respondents x burden divided by 60 minutes)
Respondents submitting annual reportable property reports	188	600 minutes (120 minutes for the report and 480 minutes for recordkeeping)	1,880
Respondents submitting close out reports	67	600 minutes (120 minutes for the report and 480 minutes for recordkeeping)	670
Total	255	600	2550

Total number of grants currently open is 376. We estimate that half of those (188) will have reportable property to report annually. Negative reports are not required. In addition, based upon actual closeouts, we estimate that 67 additional 'grant completion/closeout' reports will be required annually.

An average of 2 hours for each report and an additional 8 hours for record keeping for each respondent is estimated.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

The skill required to maintain records and prepare the annual property report is comparable to the GS-12 level in Government employment. Therefore, the GS-12, step 5 hourly burdened rate of \$32.90 (2013) is utilized to arrive at an annual cost burden of \$392.00 per recipient for annual reports. Multiplying the \$392.00 rate by 188 annual reports results in a burden of \$73,696.00. To that figure, we must add the burden for the additional 67 annual reports submitted for closeout. Burden for these 67 reports is calculated by multiplying the \$32.90 hourly rate by 2 hours because the recordkeeping is already accounted for and only the report submission is needed. Two hours multiplied by the hourly rate equals \$65.80 per report multiplied by 67 instances equals a burden of \$4408.60.

Therefore, the total annual respondent burden is \$73,696.00 plus \$4408.60 or \$78,104.60

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

Estimated annual cost to NASA is \$145,681.50. Agency activity includes communication with grantees, receipt and processing of the reports, accounting system entry at NASA Center and Agency levels, input to Agency Financial Statements, problem resolution, grantee training, and policy development. We estimate that NASA employees, in total, spend about 10 hours per report. We estimate that the average employee performing the functions is at the GS-14 level. The hourly burdened rate for 2013, with DC differential is \$57.13. Consequently, NASA per report burden is \$571.30. Total burden is \$571.30 multiplied by the number of reports, 255, for a total of \$145,681.50.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no program changes. Greater use of information technology has reduced the amount of time needed for recordkeeping as it relates to this collection

16. For collections of information intended for publication, outline plans for tabulation and publication.

Not applicable

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.

The information collection expiration date will be displayed within the PRA Statement.

18. Explain each exception to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-1.

NASA Office of Procurement takes no exception to the certification statement below:

The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;*
- (b) It avoids unnecessary duplication;*
- (c) It reduces burden reduction for small entities;*
- (d) It uses plain, coherent, and unambiguous language that is understandable to respondents;*
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;*
- (f) It indicates the retention periods for recordkeeping requirements;*
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3) about:*
 - (i) Why the information is being collected;*
 - (ii) Use of information;*
 - (iii) Burden estimate;*
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);*
 - (v) Nature and extent of confidentiality; and*
 - (vi) Need to display currently valid OMB control number;*
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of the instructions);*
- (i) If applicable, it uses effective and efficient statistical survey methodology; and*
- (j) It makes appropriate use of information technology.*

B. Collections of Information Employing Statistical Methods

Not Applicable.