# SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

## A. Justification

### A1. Need for Information Collection

The Corporation for National and Community Service (CNCS) awards grants to states, institutions of higher education, non-profit organizations, Indian tribes, and U.S. Territories to operate AmeriCorps State, AmeriCorps National, AmeriCorps NCCC, AmeriCorps VISTA, and Senior Corps programs. This information collection allows CNCS to meet its fiduciary responsibilities under the Uniform Administrative Requirements for Federal Grants to ensure grantees have effective systems in place to account for and manage Federal grant funds.

### A2. Indicate how, by whom, and for what purpose the information is to be used.

Organizations that have never received a grant before from CNCS must complete the form before receiving a CNCS grant. CNCS uses the information to determine if grantees have proper accounting policies, procedures and systems in place to manage Federal grant funds and to identify any training and technical assistance the grantee may need to ensure they account for funds as required by Federal statutes, OMB Circulars and regulations. CNCS has used the information to design Federal Financial Management training for grantees and to provide technical assistance to grantees.

### A3. Minimize Burden: Use of Improved Technology to Reduce Burden

CNCS accepts electronic submission of the information and, if grantees are unable to report on-line, allows them to submit the attached form in hard copy.

### A4. Non-Duplication

There are no other sources of information by which CNCS can meet the purposes described in A2 (above).

#### A5. Minimizing the economic burden for small businesses or other small entities.

This collection of information does not impact small businesses because they are not eligible to apply for CNCS' grants subject to the information collection. There is no economic burden to any other small entities beyond the cost of staff time to collect and report the data. This is minimized to the degree possible by only asking for the information absolutely necessary to assess the organization's financial management capabilities.

# A6. Consequences of the collection if not conducted, conducted less frequently, as well as any technical or legal obstacles to reducing burden.

CNCS will be unable to determine if grantee financial systems are adequately designed and implemented to protect Federal resources. Federal funds could be used for unallowable purposes, have records that are inadequate for federal oversight and audit.

A7. Special circumstances that would cause information collection to be collected in a manner requiring respondents to report more often than quarterly; report in fewer than 30 days after receipt of the request; submit more than an original and two copies; retain records for more than three years; and other ways specified in the Instructions focused on statistical methods, confidentially, and proprietary trade secrets.

There are no special circumstances that would require the collection of information in any other ways specified.

A8. Provide copy and identify the date and page number of publication in the Federal Register of the Agency's notice. Summarize comments received and actions taken in response to comments. Specifically address comments received on cost and hour burden.

The 60 day *Notice* soliciting comments was published on April 16, 2014, at pages 21446-21447. No comments have been received.

### **A9.** Payment to Respondents

There are no payments or gifts to respondents.

# A10. Assurance of Confidentiality and its basis in statute, regulation, or agency policy.

Information provided by this collection may be shared with external parties in furtherance of CNCS's mission. This could include, but is not limited to, sharing the information with Congress and other federal, state, local, or tribal governments.

If the collection is covered under the Privacy Act: the following Privacy Act Notice will be included on this information collection request: The information requested is collected pursuant to 42 U.S.C. 12592 and 12615 of the National and Community Service Act of 1990 as amended, 42 U.S.C. 4953 of the Domestic Volunteer Service Act of 1973 as amended, and 42 U.S.C. 12639. Purposes and Uses - The information requested is collected for the purposes of reviewing grant applications and granting funding requests. Routine Uses - Routine uses may include disclosure of the information to federal, state, or local agencies pursuant to lawfully authorized requests. In some programs, the information may also be provided to federal, state, and local law enforcement agencies to determine the existence of any prior criminal convictions. The information may also be provided to appropriate federal agencies and Department contractors that have a need to know the information for the purpose of assisting the Department's efforts to respond to a suspected or confirmed breach of the security or confidentiality of information maintained in this system of records. The information will not otherwise be disclosed to entities outside of CNCS without prior written permission. Effects of Nondisclosure - The information requested is mandatory in order to receive benefits.

### A11. Sensitive Questions

The information collection does not include questions of a sensitive nature.

### A12. Hour burden of the collection

An organization that has been approved for a CNCS grant must complete the information collection only once. We expect about 20 respondents will have to complete the form each year on average, and the frequency is only once. The time to complete the form and gather other required documents should not exceed 1.75 hours of effort per respondent. There is no annualized cost because an organization does not have to submit the form annually.

### A13. Cost burden to the respondent

There is no cost to the respondent.

### A14. Cost to Government

There are no additional costs to the Government.

#### A15. Reasons for program changes or adjustments in burden or cost.

Not applicable.

### A16. Publication of results

Not applicable because the responses to this information collection will not be published.

# A17. Explain the reason for seeking approval to not display the expiration date for OMB approval of the information collection.

Not applicable.

#### A18. Exceptions to the certification statement

There are no exceptions to the certification statement in the submitted ROCIS form.