

Supporting Statement
Grant Recipient's Accounting System and Financial Capability Questionnaire
NA Form 17003
OMB Control No. 3095-0072

1. **Circumstances Making the Collection of Information Necessary.** Pursuant to the updated Title 2, Code of Federal Regulations, Office and Management Guidance for Grants and Agreements grant recipients are required to maintain adequate accounting controls and systems in managing and administering Federal funds. Changes in the revised Title 2 from December 26, 2014 that increased the amount of grant funds given to a single institution the trigger a single federal audits require us to update this form. Some of the recipients of grants from the National Historical Publications and Records Commission (NHPRC) have proven to have limited experience with managing Federal funds. This questionnaire is designed to identify those potential recipients and provide appropriate training or additional safeguards for Federal funds. Additionally, the questionnaire serves as a pre-audit function in identifying potential deficiencies and minimizing the risk of fraud, waste, abuse, or mismanagement, which we use in lieu of a more costly and time consuming formal pre-award audit.

In February 2015, NARA submitted a Change Worksheet for the actual form, revising Federal Audit data numbers, allowing URL for respondents for a couple of data fields, and updating Time and Effort Reporting data fields.

2. **Purpose and Use of the Information.** NARA's Office of the Inspector General conducted an audit of the NHPRC and recommended the addition of this questionnaire as a method to improve its financial monitoring of grantees. This questionnaire will assist in determining those applicants requiring special attention in matters relating to the accountability of Federal funds. This is a one-time questionnaire and assists the NHPRC in pre-screening applicants to avoid high-risk situations and protect Federal funds.

3. **Use of Information Technology and Burden Reduction.** Once members of the Commission recommend an application for funding, the questionnaire can be emailed or faxed to NHPRC staff.

4. **Efforts to Identify Duplication and Use of Similar Information.** There is no duplication.

5. **Impact on Small Business or Other Small Entities.** The information does not impact small businesses and other entities.

6. **Consequences of Collecting the Information Less Frequently.** Once the form is approved, the information will be collected once from each successful grant applicant to the NHPRC. If the information was not collected, the government could risk funding applicants with inadequate accounting and financial management systems.

7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** The collection will be conducted in a manner consistent with the guidelines in 5 CFR 1320.

8. **Comments in Response to the Federal Register Notice and Efforts to Consult outside Agency.** NARA provided the public an opportunity to comment on the information collection

in a Federal Register published on February 18, 2015 (80 FR 8700). One comment was received from Mr. Rafael E. Roman. He stated, "However, during our review we noted that the word "qualified" (used twice on the bottom of page 1) was used to describe an auditor's opinion. The term "qualified" was replaced with the word "modified" a couple of years ago during the accounting professions update of standards." NARA agreed with his comment and made the change to NA Form 17003. During our internal review to confirm his comment, a NARA staff member suggested we change the title of the form from "National Archives" Accounting System and Financial Capability Questionnaire to "Grant Recipient's Accounting System and Financial Capability Questionnaire. Title change was made as well.

9. **Explanation of Any Payment or Gift to Respondents.** No gifts or payments are made to respondents for completing this questionnaire.
10. **Assurance of Confidentiality Provided to Respondents.** The collection of information, which would require privacy or confidentiality, is not planned.
11. **Justification for Sensitive Questions.** There are no questions of a sensitive nature contained in the questionnaire.
12. **Estimate of Hour Burden Including Annualized Hourly Costs.** Estimated burden hours: 75 respondents per year, @4 hours per respondent for a total annual burden of 300 hours. These respondents are requested to submit the questionnaire only once when the Commission has recommended a grant to an organization but before it is awarded the official award. Seventy-five respondents based upon a cost of 4 hours staff time @ \$20.00 per hour totals \$6,000. This estimate is based upon respondents providing information on the questionnaire from already established accounting records.
13. **Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** There is no annual cost to respondents apart from that enumerated in Item 12.
14. **Annualized Cost to the Federal Government.** Estimated annualized cost to the Federal government is \$1,500, based on one hour of review time at \$20.00 per hour.
15. **Explanation for Program Changes or Adjustments.** There are fewer grant awards being made hence a reduction in the number of respondents and corresponding burden hours.
16. **Plans for Tabulation and Publication and Project Time Schedule.** The information collected from the questionnaire will not be published.
17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** The expiration date for OMB approval of this information collection will be displayed on the questionnaire.
18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I "Certification for Paperwork Reduction Submissions."