**Supporting Statement**

**Data Collection Form for**

**Assurances – Non-Construction Programs
SF-424B**

The SF-424B Assurances – Non-Construction Programs (SF-424B) form is an OMB approved collection (4040-0007). We are seeking approval by OMB for reinstatement as a Common form. This form will be utilized by 26 Federal agencies and additional grant-making entities. We are requesting a 3-year clearance of this form.

**A. Justification**

**1. Need and Legal Basis**

The Office of Federal Financial Management (OFFM) leads efforts at government-wide grants management to assure that Federal grants to non‑Federal entities are managed properly and spent in accordance with laws and regulations. Working cooperatively with Federal grant‑making agencies and non‑Federal entities, OFFM establishes policies and guidelines through OMB's Uniform Administrative Requirements. Grants.gov serves as a repository for Federal grant-related forms on behalf of OMB OFFM.

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, establish the reporting requirements fulfilled by this form.

**2. Information Users**

The form is used by non-Federal entities to apply for grants, and by Federal grants management staff to evaluate applicants for Federal financial assistance.

**3. Improved Information Technology**

Federal awarding agencies have the option of allowing recipients to use electronic submission of alternate forms. Although agencies can allow recipients to submit electronically, or via other forms, they are only approved to collect the information approved under this information collection

**4. Duplication of Similar Information**

There is no other source for the information reported on this form.

**5. Small Businesses**

The information requirements do not pertain to small business or other small entities.

**6. Less Frequent Collection**

No less frequent collection is feasible.

**7. Special Circumstances**

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards establish the requirements fulfilled by this form.

**8. Federal Register Notice/Outside Consultation**

The Grants.gov Program Management Office published the current SF-424 B collection for 90-day public comment in the *Federal Register* November 11, 2014 (79 FR 65966) and 60-day public comment February 11, 2015 (80 FR 7596). Interested individuals were invited to send comments regarding any aspect of this collection of information. No public 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.  The 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**

As this is a Common Form, burden is reported only for HHS. By aggregating the agency’s estimates as reported from the Grants.gov data call, an estimate of the total burden of the information collection was developed.

HHS received approximately 40,000applications annually and estimates that it takes applicants approximately 30 minutes to complete each application. Cumulatively, HHS reports the total burden to applicants to be approximately 20,000 hours.

**Section A. Estimated Annualized Burden Hours to Respondents**

**SF-424B Form Estimated Annualized**

**Burden to Respondents**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **AGENCY** | **SF-424 B Number of Annual Respondents** | **Number of Responses per Respondent** | **Total Annual Responses** | **Average Burden on Respondent per Response in Hours** | **Total Burden Hours** |
| **HHS** | 40,000 | 1 | 40,000 | 30/60 | 20,000 |
| **TOTAL** | **40,000** |   | **40,000** |   | **20,000** |

**Section B. Burden Cost**

**SF-424B Form Estimated Annualized**

**Cost to Respondents**

|  |
| --- |
| **Cost To Respondents** |
| **AGENCY** | **Type of Respondent** | **Hourly Wage Rate** | **Total Burden Hours** | **Total Respondent Cost** |
| **HHS** | Grant Writer |  $ 30.00  | 20,000 |  $ 600,000.00  |
| **TOTAL** | **20,000** |  **$ 600,000.00**  |

The Estimated Annualized Cost to Respondents assumes that the Hourly Wage Rate for a grant writer is $30. The Total Burden Hours times the Hourly Wage Rate produces the Total Respondent Cost which is $600,000.

**13. Capital Costs**

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the SF-424B form.

**14. Cost to the Federal Government**

The proposed SF-424B form is based on an OMB-approved from currently in use. There is no projected incremental increase in the cost burden to the Federal Government with the implementation of the renewed SF-424B form.  Each agency currently has existing personnel, systems and processes (or other resources) in place to receive and review their grant applications.  Any additional cost for agency system development, maintenance and enhancements should not be attributed to use of the SF-424B, and therefore its use is not expected to alter annualized Federal costs.

|  |
| --- |
| **Cost to Government** |
| **Total Annual Responses** | **Agency Personnel Time to Review (Hours)** | **Total Burden Hours on Agency Personnel** | **Average Grants Administrative Hourly Salary** | **Estimated Annual Cost to Federal Government for Form Review** |
| 40,000 | 20/60 | 13,333 | $39 | **$519,999** |

The organization personnel time to review the form is estimated to average 20 minutes per form. Based on 40,000 responses per year, then 13,333 are estimated personnel hours to review. Grants administrative personnel generally are in the GS9 - 15 range. Based on a step one average of these grades, an average hourly salary is $39 per hour. Therefore, 13,333 hours x $39 = $519,999 of estimated annual cost to the federal government to review the form.

**15. Program or Burden Change**

Not applicable as there were no program nor burden changes.

**16. Publication and Tabulation Dates**

There are no publication plans for collected data including summarizing or tabulating by Grants.gov.

**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.