

## THE SUPPORTING STATEMENT

### **1. Circumstances Making the Collection of Information Necessary**

This request is for a renewal of, and revision to, the current information collection (Uniform Project Description (UPD), 0970-0139) that will add statutorily mandated programs and content to the UPD. The complete list of programs is available as Attachment A.

The Administration for Children and Families (ACF) is requesting a renewal of the Uniform Project Description (UPD) (OMB Control number 0970-0139). The UPD is available for use by program offices to solicit the project description and project budget information for project grants and cooperative agreements. This approach consists of a menu of narratives from which the program office can select the communicate the application requirements for a specific project grant or cooperative agreement funding opportunity announcement (FOA), as required by Appendix I to 45 C.F.R. § 75.203, excerpted in Attachment C.

Text options selected for use in a given FOA define the required project description and budget justification portion to the grant applicant. The ability to select standard language that is appropriate for a given FOA reduces the burden associated with application preparation by eliminating irrelevant portions of the application for a given announcement. In addition, it provides consistency in the application objective review process required by 45 C.F.R. § 75.204.

The full UPD is available as Attachment B.

The information required in applications for project grants and cooperative agreements is required by HHS regulation implemented at Appendix I to 45 CFR Part 75. (Attachment C)

### **2. Purpose and Use of the Information Collection**

Administration for Children and Families (ACF) Program Offices, grants management officials, and expert non-Federal and Federal panel reviewers use the collected information provided through grant applications to select and award discretionary grants and cooperative agreements. Program Offices use the information to ensure that Congress's intent of authorizing legislation will be implemented through any funded grant project and that applicant entities are eligible to receive grant funds.

Expert non-Federal and Federal objective review panelists score the information provided in applications as they evaluate applications in the context of the FOAs' published criteria to ensure that the best-proposed projects are funded.

Grants management officials use the information collected to ensure appropriate Federal stewardship of Federal grant funds. This includes review of compliance audits, information provided by OMB-designated websites, and, when available, CPA certifications that appropriate financial systems are in place and that proposed budgeted project costs are allowable, allocable and reasonable.

### **3. Use of Improved Information Technology and Burden Reduction**

In October 2011 (FY 2012), ACF published a notice in the *Federal Register* (76 Fed. Reg. 6671) requiring electronic submission of grant applications to discretionary FOAs through [Grants.gov](http://Grants.gov), an OMB-designated website. Subsequent to the HHS's implementation of 2 CFR Part 200 at 45 CFR Part 75, where electronic application through Grants.gov is required at § 75.206, electronic application submission has risen from 80 percent (in 2011) to 95 percent (in 2015) of all applications. The electronic grant application submission process reduces the time and financial burden to the applicant, making the application process more efficient by eliminating delays and costs inherent in a paper-based manual process.

The electronic grant application process involves four functions. First, an interested party would use the *Search Grants* function at Grants.gov to identify a particular

public assistance funding opportunity. Second, the application package would be downloaded over the Internet under *Application Package* at Grants.gov. Next, the applicant prepares the application package off-line, or using the Grants.gov *Workspace*, and submits the application package electronically. Last, Grants.gov allows for the applicant to track the status of the submitted application using *Track My Application*.

Once an Authorized Organizational Representative (AOR) registers with Grants.gov as an AOR, the organization's registered E-Biz Point of Contact receives a notification and can authorize the AOR to submit grant applications through Grants.gov on behalf of the organization.

The UPD is installed as an element of an electronic FOA template that is part of a consolidated Announcement Module (AM) System in which ACF's FOAs are drafted, reviewed and approved, and published. The AM system keeps the content of the UPD fixed so that it does not vary from its approved format. The AM System also interfaces with the HHS Grants Forecast website at <http://www.acf.hhs.gov/hhsgrantsforecast/> so that the public has prior notification of all planned ACF FOAs.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

This is not applicable. Competitive applications are time and applicant specific. The UPD provides a common way in which this information is collected to avoid duplicative efforts.

#### **5. Impact on Small Businesses or Other Small Entities**

The information requested is selected from the available text options in the UPD and assures the minimum amount needed to comply with program requirements. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate the unique program criteria.

## **6. Consequences of Collecting the Information Less Frequently**

If this information is not collected, adequate data will not be available to evaluate the proposed projects and select the appropriate grantees. Reduced frequency is not possible as the annual frequency to solicit applications and make grant awards coincides with the annual appropriation of funds by Congress. Furthermore, not collecting applications for competitive projects would be inconsistent with Departmental policy and other authorities.

The consequence of requiring OMB review of individual program announcements would be to place additional stress on an already constrained annual grant cycle. The effect would be a delay in publishing FOAs, creating a need to shorten the time applicants have to prepare applications. Time for competitive review would also need to be compressed to allow for the award of grants by mid-September of each calendar year. With the addition of new programs, these consequences become more pronounced.

Applications are required for project grants and cooperative agreements as prescribed by HHS regulations 45 CFR § 75.203.

The UPD is fundamental to ACF's competitive award process. It ensures the provision of adequate information to support award decisions.

## **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

Proprietary trade secrets or other confidential information are addressed at element 10 with excerpts from the HHS Grants Policy Statement.

There are no special circumstances.

## **8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

A notice was placed in the *Federal Register* on February 27, 2015, (Volume 80, Number 31) page number 8324, soliciting comments to the ACF. No comments were received.

The active pool of ACF discretionary grantees includes approximately 3,000 educational and private non-profit institutions; and State, Local or Tribal Governments. Through routine inquiry, pre- and post-award, and grant closeout phases of grant administration, and through routine dialogue between ACF and applicants and grantees, the substance and detail of the information collected is the focus of attention since it is the basis for award.

Because the grant establishes a relationship between ACF and applicants and grantees, consultation with the community is a necessary and ongoing process.

#### **9. Explanation of Any Payment or Gift to Respondents**

There are no payments or gifts to applicants. The only remuneration is the grant payment dispersed to those entities awarded a grant or cooperative agreement.

#### **10. Assurance of Confidentiality Provided to Respondents**

Assurances of confidentiality necessary to inform the applicant of project grants and cooperative agreements are located in three specific places, Grants.gov, GrantSolutions.gov (grants management system), and in HHS policy, which is incorporated in the HHS Grants Policy Statement (GPS). The following are excerpts from the relevant portions of these sources:

### **Grants.gov**

<http://www.grants.gov/web/grants/privacy.html>

## **“PRIVACY POLICY**

### **Please Review our Privacy Policy for Your Protection**

Thank you for visiting Grants.gov and reviewing our privacy and security policy. The Grants.gov privacy policy protects the rights of individual users under section 552a of title 5, United States Code (commonly referred to as the "Privacy Act"), and other laws relevant to the protection of the privacy of an individual. All information is gathered, stored, and used in accordance with the above-mentioned Privacy Act.

NOTE: Our privacy and security policy is clear: *We will collect no personal information about you when you visit our website unless you choose to provide that information to us.*

### **Information Collected and Stored Automatically**

Grants.gov does not require a user to submit information to browse the Grants.gov site. The only users who are required to submit contact information are those users who wish to be authorized submitters on behalf of their organization, or users who wish to receive information directly from Grants.gov.

Grants.gov collects personal information about you (e.g., name, email address, phone number, title, username) only if you specifically and knowingly give it to us. If you consent to provide us with personal information (by providing feedback or by asking a question), we use that information to respond to your message and to help us get you the information you have requested. We only share the information you give us with other government agencies if your inquiry relates to that agency, or as otherwise required by law. Moreover, we do not create individual profiles with the information you provide or give it to any private organizations. We do not collect information for commercial marketing.

Grants.gov collects information to allow access for two types of users:

- Agency Users

- Authorized Organization Representatives

NOTE: All information collected and stored in compliance with the [Paperwork Reduction Act](#). Any information submitted to Grants.gov through the application process will be stored in the Grants.gov system for a period of six months. Additionally, no one from Grants.gov will ever ask you for personal information, such as your Social Security number, banking, or credit card information.

When you browse, read pages or download information on Grants.gov, we automatically gather and store certain technical information about your visit. This information never identifies who you are. The information we collect and store about your visit is listed below:

- The Internet domain (e.g., "xcompany.com" if you use a private Internet access account, or "yourschool.edu" if you connect from a university's domain) and IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you access our website;
- The type of browser (e.g., Firefox, Internet Explorer) and operating system (e.g., Windows, OS X) used to access our website;
- The date and time you access our website;
- The pages you visit; and,
- If you clicked on a link to the Grants.gov website from another website, the address of the website.

This information is only used to help us make the site more useful for you. With this data we learn about the number of visitors to our site and the types of technology our visitors use. We never track or record information about individuals and their visits. ..."

## **GrantSolutions.gov**

All electronically-submitted applications are transmitted from Grants.gov directly into the GrantSolutions.gov, a comprehensive grants management system provided by the Grants Center of Excellence.

Through this system, grantees may see their grant files as well as submit and track requests for changes and

continuations to projects. Currently, along with HHS, the Department of Transportation and State Department are also utilizing GrantSolutions.

In obtaining a grantee user account, GrantSolutions.gov requires submission of a formal request form that includes a US Government Data Access Request/Security Compliance Statement and HHS's Rule of Behavior for Personal Use of Information Technology Resources  
<http://www.hhs.gov/ocio/policy/2006-0001.html>. ..."

NOTE: Upon receiving paper-format applications, ACF scans the documents into .PDF format and attaches them to the appropriate Grantsolutions.gov file, after which the original copies are destroyed.

## **HHS Grants Policy Statement**

ACF displays a link to the [HHS Grants Policy Statement](#) (GPS), the consolidated terms and conditions for all HHS awards, on the ACF / Grants & Funding / Post-Award Requirements/ Discretionary Post-Award Requirements /Terms and Conditions web page Excerpts from the GPS that address proprietary and confidential information are as follows:

### **"Use of Application Information**

Applicants are discouraged from submitting information considered proprietary unless it is deemed essential for proper evaluation of the application. However, if the application contains information that the applicant organization considers to be trade secrets, information that is commercial or financial, or information that is privileged or confidential, the pages containing that information should be identified as specified in the funding opportunity announcement or application instructions.

When non-Federal reviewers are used, the funding opportunity announcement or application instructions will specify that applicants have the option of omitting specific salary rates or amounts for individuals specified in the application budget and, if required by the OPDIV, Social Security numbers for individuals. For hard-copy applications, this can be accomplished by including the information in the original, but omitting it from the application copies. The copies may include summary salary information. For



electronic applications, the information must be supplied to the OPDIV as part of the submission. The funding opportunity announcement will specify if the applicant should indicate, in the application or in a separate form, whether it wants to use that option. If the detailed information is an integral part of the application, the OPDIV will ensure that the information is not shared with reviewers.

The OPDIV will protect the information contained in an application from unauthorized disclosure, consistent with the need for objective review of the application and the requirements of the Freedom of Information Act and the Privacy Act. However, if a grant is awarded as a result of or in connection with an application, the Federal government has the right to use or disclose the information to the extent authorized by law. Post-award considerations concerning release of information and access to research data are addressed in Part II of this policy statement.

### **Privacy Act**

The Privacy Act of 1974, 5 U.S.C. 552a, and its implementing regulations (45 CFR part 5b) provide certain safeguards for information about individuals maintained in a system of records (i.e., information may be retrieved by the individual's name or other identifying information). These safeguards include the rights of individuals to determine what information about them is maintained in Federal agencies' files (hard copy or electronic) and how it is used; to have access to such records; and to correct, amend, or request deletion of information in their records that is inaccurate, irrelevant, or outdated.

Records maintained by HHS Operating Divisions (OPDIVs) with respect to grant applications, grant awards, and the administration of grants may be subject to the provisions of the Privacy Act. For example, OPDIVs that maintain or access any such records by name of an individual, such as by the name of the PI/PD, are subject to the Privacy Act.

Parties other than PIs/PDs may request the release of Privacy Act records. Such requests are processed in the same manner as FOIA requests. For example, information requested by co-investigators in grant applications is released to them only when required under FOIA because they have no right of access under the Privacy Act. When releasing information about an individual to a party other than that

individual, OPDIVs will balance the individual's right to privacy with the public's right to know as provided by the FOIA."

## 11. Justification for Sensitive Questions

Questions of a sensitive nature are not asked. Please refer to the UPD narratives in Attachment B.

## 12. Estimates of Annualized Burden Hours and Costs

This request is for authorization to use the UPD for 45 statutorily mandated ACF programs for project grants and cooperative agreements.

Based on reports for years 2012, 2013, and 2014, ACF estimates an average of 4,633, applications will be submitted annually. On average the burden hours per response is 60 hours. Frequency is once when the applications are solicited through the FOA and annually for the award of noncompetitive continuation grants for up to a 5-year project period. Therefore, the total hourly burden annually is expected to be 277,980 hours. Hourly burden for the SF 424 series of forms is covered under a separate OMB information collection clearance.

Total annualized dollar cost based on hourly burden, based on an average \$50 per hour is \$13,899,000 ( $\$50 \times 277,980$  hours).

| Instrument | Number or Respondents | Number of Responses per Respondent | Average Burden Hours Per Response | Total Burden Hours |
|------------|-----------------------|------------------------------------|-----------------------------------|--------------------|
| UPD        | 4,633                 | 1                                  | 60                                | 277,980            |

A list of programs with their associated burden is available as Attachment A.

The monetary value of this time is 277,980 hours times \$50 per hour or \$13,899,000.

**13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

Not applicable. Generally, applicants for project grants and cooperative agreements develop applications use current employees who have an in-depth knowledge of the organization's capabilities and finances. This applies to total capital and start-up, total operation and maintenance, and purchase of services costs. In summary, there are no direct (incremental) monetary costs to respondents other than their time to prepare the applications. Though it is not a requirement, applicants may choose to contract with a professional grants writer as a consultant for the purpose of application preparation. Information on the monetization of these costs is provided above under A.12.

**14. Annualized Cost to the Federal Government**

It is estimated that, on average, there are 20 hours of labor on the part of government employees to develop the request package (FOA). The average annual number of applications is 4,633, which equates to 92,660 hours of staff time. Based on an average of \$50 per hour, in monetary terms this equates to \$4,633,000. Therefore, approval of this request represents a savings to the Federal Government.

The competitive objective review is performed by non-federal reviewers and/or federal reviewers, which incurs costs to the Federal Government with, or without, the UPD.

**15. Explanation for Program Changes or Adjustments**

Program changes are caused by variance in actual numbers of applications received in each of the years that were used in developing the burden estimates. Differences occur between years as each program is not re-competed in each year of the surveyed years. In addition, new programs, and their estimated burden, were added during the prior approval period. In some cases, these burden estimates, based on the actual numbers of the surveyed years, was lower than expected. Revisions to these estimates are reflected in Attachment A.

The net difference in responses is 5,519 in the prior renewal and 4,633 in the current request for a decrease of 886 responses. For burden hours, the current approval is 331,140 hours and the current request is for 277,980 hours for a decrease of 53,160 burden hours. There is no cost burden on respondents.

We have based the current number of responses and burden hour estimates on the review of the actual numbers of received applications during Federal Fiscal Years (FYs) 2012, 2013, and 2014. In the course of this review, we found programs and their associated CFDA Numbers that had not been included in the prior renewals though they do not represent new programs. In addition, ACF is adding a few new programs. In total, ACF is adding the following nine programs for use of the UPD:

| <b>CFDA Number</b> | <b>Program Title</b>   |
|--------------------|--|
| 93.095             | HHS Programs for Disaster Relief Appropriations Act Non Construction           |
| 93.327             | Demonstration Grants for Domestic Victims of Human Trafficking                 |
| 93.340             | Native American Community Research, Demonstration, and Pilot Projects          |
| 93.569             | Community Services Block Grant   |
| 93.575             | Child Care and Development Block Grant   |
| 93.586             | State Court Improvement Program  |
| 93.590             | Community-Based Child Abuse Prevention Grants                                  |
| 93.596             | Child Care Mandatory and Matching Funds of the Child Care and Development Fund |
| 93.872             | Tribal Maternal, Infant, and Early Childhood Home Visiting Program             |

Since the last renewal, the following 11 programs are no longer in use for the UPD and should be deleted:

| <b>CFDA Number</b> | <b>Program Title</b>   |
|--------------------|--|
| 93.009             | Compassion Capital Fund  |
| 93.010             | Community-Based Abstinence Education (CBAE)                                    |
| 93.091             | Social Services and Income Maintenance Benefits Enrollment Coordination Grants |
| 93.320             | Affordable Care Act (ACA) Research and Evaluation of the Maternal, Infant and  |

|        |   |
|--------|---|
|        | Early Childhood Home Visiting Program   |
| 93.508 | Affordable Care Act (ACA) Tribal Maternal, Infant and Early Childhood Home Visiting Program |
| 93.593 | Job Opportunities for Low-Income Individuals  |
| 93.597 | Grants to States for Access and Visitation Programs   |
| 93.616 | Mentoring Children of Prisoners   |
| 93.708 | ARRA-Head Start   |
| 93.709 | ARRA-Early Head Start   |
| 93.711 | ARRA-Strengthening Communities Fund   |

Changes to the UPD guidance are editorial and consist of streamlining the instructions for ACF Drafters. The deleted material has been replaced by internal agency training materials.

Under the Project Description options, the title of the option for "OUTCOMES EXPECTED" is revised to "EXPECTED OUTCOMES."

Also, under the Project Description options, text boxes are added to two options: "PROGRAM PERFORMANCE EVALUATION PLAN" and "FUNDED ACTIVITIES EVALUATION PLAN." The text boxes will allow program office staff to provide detail related to specific program goals and requirements stated in the FOA. This change will assist applicants in focusing their response to the request. Typically, only one of these two options is required under a specific FOA, not both. And, under Guidelines for Preparing a Project Description for an Abbreviated Application, the headings for one type of abbreviated application has been revised to clarify the circumstances under which each application type is used, according to HHS grants policy from "APPLICATIONS FOR SUPPLEMENTAL AWARDS" to "APPLICATIONS FOR EARMARK, SUPPLEMENTAL, SINGLE-SOURCE AND EMERGENCY AWARDS."

## **16. Plans for Tabulation and Publication and Project Time Schedule**

Information in grant applications will not be published. The disclosure of information in grant applications is regulated

by, and subject to, The Freedom of Information Act (FOIA) and The Privacy Act of 1974.

The most significant exemptions from disclosure of grant application information are 4 and 5 in the FOIA. Exemption 4 protects from public disclosure of two types of information: trade secrets and commercial or financial information obtained that is privileged or confidential. Exemption 5 applies to internal government documents and permits the withholding of internal recommendations, advisory opinions, and materials used for evaluation.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate**

There will be no exceptions to the practice of displaying the expiration date. The display of the expiration date for OMB approval on a program narrative will never be considered inappropriate.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions.

**B. Statistical Methods (used for collection of information employing statistical methods)**

Statistical methods are not used since there is no attempt to draw inferences about a population. The applications received are the universe.