Funding Opportunity Announcements Susan Harwood Training Grant Program Supplemental Justification (May 2018)

Supplemental Supporting Statement A: Justification

This request seeks OMB approval under the Paperwork Reduction Act for the unique information collection requirements in the Susan Harwood Training Grant Program Funding Opportunity Announcements (FOA). The Occupational Safety and Health Administration (OSHA), U.S. Department of Labor, will announce the availability of approximately \$10.5 million in grant funds authorized by Section 21 of the Occupational Safety and Health Act of 1970 (the "OSH Act") (29 U.S.C. 670). We expect to fund approximately 80 grants, ranging from \$75,000 to \$165,000 each. Applicants may apply for up to \$165,000 depending on the type of grant.

Three separate solicitations will be made under the Fiscal Year 2018 Susan Harwood Training grant program for: Targeted Topic, Training and Education Materials Development, and Capacity Building Development grants.

The purpose of the Susan Harwood Training Grant program is to offer opportunities for nonprofit organizations to compete for funding so they may develop and conduct training opportunities for small business employers and workers on the recognition, abatement, and prevention of occupational safety and health hazards in the workplace, and to inform workers of their rights and employers of their responsibilities under Section 21 of the Occupational Safety and Health Act (OSH Act).

Applications will include the following information collections:

- 1) Form SF-424 Application for Federal Assistance
- 2) Application Summary
- 3) Program Abstract
- 4) Technical Proposal
- 5) Organizational Chart
- 6) Other Narrative Attachments
- 7) Form SF-424A Budget Information Non-Construction Programs
- 8) Detailed Project Budget
- 9) Indirect Cost Allocation Agreement
- 10) Evidence of Non-Profit Status
- 11) Non-federal Resource Contribution
- 12) Form SF-424B Assurances Non-Construction Programs
- 13) Grants.gov Lobbying Form
- 14) Project/Performance Site Location(s)

Electronic availability:

These grant announcements will be available on the grants.gov Web site. Electronic submission of grant applications is required. Therefore, 100 percent of responses will be submitted electronically.

Small Entities:

This information collection will not have a significant impact on a substantial number of small entities.

Assurances of confidentiality:

These grant announcements do not offer applicants assurances of confidentiality.

Special circumstances:

These FOAs imply no special circumstances.

Burden:

During the last three years, OSHA has received an average of 175 grant applications a year. The Agency estimates that it takes staff members for each applicant organization 56 hours to complete an application, including the narrative and budget components. OSHA divides the 56 hours per application between professional staff and clerical staff as follows:

Average Number of Applications	Professional Staff	Clerical Staff	Combined Totals
2015-2017: 175			
Burden Hours	38	18	56
Wage Rates ¹	\$60.05 ²	\$35.40 ³	
Cost	\$2,282	\$637	
Total Burden Hours (x 175)	6,650	3,150	9,800
Total Cost (Total Cost x 175)	\$399,350	\$111,475	\$510,825

OSHA associates no other burden costs with this information collection. In addition to the application, each grantee will be required to submit quarterly financial and program reports to OSHA. Those information collection requirements will be cleared under a separate control number.

Therefore, the annual burden hours and cost of this paperwork requirement are:

Burden Hours: 9,800 hours **Cost**: \$510,825

¹The Agency is using the same wage rates of certain employees employed under the Federal Government's General Schedule (see footnotes 2 and 3).

²The basis for the hourly wages for professional staff is the 2018 government pay scale for a Chicago area GS-13, step 10 (\$60.05). (See: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/ 2018/CHI h.pdf.) Usually PhDs, certified safety professionals, certified Industrial Hygienists, and other professional staff submit applications.

³The basis for the hourly wages for clerical staff is the 2018 government pay scale for a Chicago area GS-7, step 10 (\$35.40). (See: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/CHI h.pdf.) Clerical elements are performed by secretaries and accounting staff.

Supplemental Supporting Statement B: Statistical Methods

This information collection does not employ statistical methods.