

September 25, 2017

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0025

Title: Non-Disaster (ND) Grants System

Form Number(s): FEMA Form 080-0-0-15

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

Title 2 CFR, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, establishes uniform administrative requirements, cost principles, and audit requirements for FEMA. In order to minimize the administrative burden for State and local partners to manage grants, it is necessary to standardize FEMA’s grant administration processes.

With ND Grants, FEMA seeks to meet the intent of the E-Government initiative, authorized by Public Law 106–107 passed on November 20, 1999 that requires that all

government agencies both streamline grant application processes and provide a mechanism to electronically create, review, and submit a grant application via the Internet.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

The information collected represents the administrative information from grant recipients pertaining to grant and cooperative agreement awards issued by FEMA. This includes grantee organization, award, and performance monitoring information. The information, submitted by grant recipients, enables FEMA to evaluate applications and make award decisions, monitor ongoing performance and manage the flow of federal funds.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Currently the processes rely on multiple separate grants management systems and manual processes to perform its grants management functions.

Because DHS/FEMA currently rely on separate systems, which are neither integrated, nor capable of supporting the full lifecycle of DHS/FEMA non-disaster grants (announcement through close-out), DHS/FEMA must separately collect and collate program, financial, and performance data from the two systems as well as external sources, to inform policy makers and assist decision-making at all levels. By fully integrating and automating these systems through ND Grants (<https://portal.fema.gov>), DHS/FEMA will obtain more efficient and effective operations that better serve the needs of both internal and external stakeholders.

With ND Grants, DHS/FEMA will implement a single, integrated, web-based, grants data collection and management system, combining all existing grant management functions of both grants systems, manual processes, and incorporate any additional functionality required by DHS. This will result in the capability to manage all activities associated with non-disaster grants processes within a single full lifecycle grants management system. This system will ease the burden on grantees, providing them the functionality to manage their organization, more easily submit their applications online, and report on their performance toward completing their objectives. The new system will interface with

Grants.gov. Applicants will be notified via email to enter the system and review their applications. Grantees will then attach the detailed budget worksheet and the investment justifications.

FEMA will continue to post their grant solicitations on Grants.gov. Application will be electronically submitted to FEMA through Grants.gov and uploaded into ND Grants where they will complete the application based on the data requirements for that program. ND Grants will ease the grantees' application process as data will be pre-populated when possible. The system is designed to be user friendly and easily navigable. Grantees can access the system at any time to reference their application and provide performance data per their reporting requirements (which differ depending on the grant program).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Currently within FEMA, grantees have to leverage multiple systems to provide their application and reporting information as well as reenter information into disparate systems. ND Grants represents FEMA's resolution to reduce duplication and streamline the grants management lifecycle process for grantees.

ND Grants' application module electronically records the data entered, and eliminates the need for re-entry of the same data for grantees that apply more than once or in subsequent years. This reduces potential duplicated efforts of grantees when applying for funding. Additionally, the system will pull forward relevant information for later performance reports that the grantee is required to submit per program guidance.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Without this collection activity, FEMA will not be able to implement its grant programs and will be unable to collect applications from grantees or quarterly/semiannual reports in a uniform format. As a result, FEMA will be unable to effectively expend its annual appropriations of approximately \$4.6 billion for these programs. If FEMA could not request and obtain this information, FEMA could not exercise comprehensive programmatic and financial management, ensuring the efficient and effective use of Federal funds.

Without the approved web-based ND Grants for its non-disaster grant programs, FEMA will also reduce its ability to support information sharing, data collection, records management and financial management, and will be inhibited in its ability to accurately report the status of its programs to Congress or DHS. In addition, FEMA would not be able to provide appropriate oversight to the Grantees; ensure that awarded funds are being used appropriately; ensure that funded activities are proceeding in accordance with the conditions of the grant awards; and demonstrate that the grant programs are effective in achieving their goals.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: The special circumstances contained in item 7(b), (c), (e), (f), (g), and (h) of the supporting statement are not applicable to this information collection.

(a) Requiring respondents to report information to the agency more often than quarterly.

FEMA standards for quarterly financial and program reporting could require the agency to request more frequent reporting from recipients, with a consistent pattern of non-compliance with grant administration practices, for a defined period of time. Notice is given to the recipient prior to requesting more frequent reporting as permitted in the applicable Uniform Administrative Requirements for grant awards at 2 C.F.R. Part 200, 44 C.F.R. Part 13, or 2 C.F.R. Part 215. Historical data shows that less than one percent of grant recipients require more frequent reporting over the life of the grant.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

There are no requirements for respondents to prepare a written response to this collection of information in fewer than 30 days after receipt of it.

(c) Requiring respondents to submit more than an original and two copies of any document.

There are no requirements for a respondent to submit more than an original and two copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

Records must be retained for a period of time pursuant to the requirements of 2 C.F.R. 200.333. Generally, records must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed

quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Exceptions to this general rule pursuant to 2 C.F.R. 200.333 include:

(a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

(b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.

(c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

There is no statistical survey involved with this data collection.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

There is no use for statistical data classification in this data collection.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no requirements for respondents to submit proprietary trade secret, or other confidential information for this data collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on May 11, 2017, 82 FR 22013. No comments were received from the public. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on August 8, 2017, 82 FR 37106. No comments were received. See attached copy of the published notice included in this package.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

FEMA consults on a regular basis with its State counterparts on a variety of issues. During the grant consolidation process of the past years, FEMA met and consulted directly with State grant recipients on a number of occasions to discuss the whole range of grant administration matters, including reporting requirements. Additionally, FEMA has solicited participation from grantees for prototype review and system testing participation. FEMA will continue to reach out as the system capabilities expand.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FEMA consults with State partners on a regular basis. In particular, on matters related to this information collection submission, FEMA has been meeting with both the national association that represents State emergency management entities, as well as individual States. These consultations involve discussions as to what is the nature of the information needed by FEMA to manage the grant programs. State partners offer comments and suggestions about their reporting. The most common area of concern is the performance reporting, as most States are very familiar and comfortable with the grant administrative and financial reporting data elements that FEMA uses.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on March 18, 2015 and is still validate.

The Privacy Impact Assessment, PIA coverage is covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on February 19, 2015. The System of Records Notice, SORN coverage is DHS/FEMA-004 Non-Disaster Grant Management Information Files (March 13, 2015; 80 FR 13404).

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

For some of the grant programs, there are 56 States and territories that receive FEMA grants and cooperative agreements. According to the particular grant program, all States

may or may not receive any particular grant. The following are existing grant programs that use the forms outlined in this collection. FEMA has continued to closed-out some grant programs, therefore the burden estimates are amended to incorporate a decrease in burden hours. See the tables in 12(c) below for the details of the individual grant programs. Program information for each grant is approved for use in separate collections.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.46 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	Non-Disaster (ND) Grants System / FEMA Form 080-0-0-15	2,380	22.1	52,598	0.5 (30 minutes)	26,299	\$37.57	\$988,053.43
Total		2,380		52,598		26,299		\$988,053.43

Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics Web site (www.bls.gov) the May 2015 National Occupational Employment and Wage Estimate average hourly wage for State Government (North American Industry Classification System (NAICS) 999200), all occupations (Standard Occupational Classification 00-0000), is estimated to be \$25.73 per hour (https://www.bls.gov/oes/2015/may/naics4_999200.htm). In addition, a 1.46 multiplier for benefits has been included, resulting in a total wage rate of \$37.57 for completing and submitting the FEMA grant information to FEMA for review and approval. A 1.46 load multiplier is calculated based on Bureau of Labor Statistics, Employer Costs for

Employee Compensation, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, June 2014

(https://www.bls.gov/news.release/archives/ecec_09102014.htm) by dividing total compensation for all workers of (\$31.96) by wages and salaries for all workers of (\$21.95). The resulting estimated annual cost is \$988,053.43.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Item	Cost (\$)
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Contract Costs There are two contracts that support this effort and the costs are:	\$7,652,000.00
Operations and Maintenance \$3,346,000.00 This supports infrastructure, operations, and security costs to maintain ND Grants.	
System Development \$4,306,000.00 This contract is with IBM in support of the continued development of ND Grants.	
Total: \$7,652,000.00	
Staff Salaries [4 GS-13 FTEs, averaged at a step 5, 2017 OPM Salary Table (Washington DC Locality Pay), at 75% time annually, with a 1.46 benefits multiplier. 2 GS-14 FTEs, averaged at a step 5, 2017 OPM Salary Table (Washington DC Locality Pay), at 33% time annually with a 1.46 benefits multiplier.]	\$592,902.03
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$8,244,902.03

Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 112-0-2				16770	0	-16770
FEMA Form 112-0-3 A, B, C				6074	0	-6074
FEMA Form 112-0-4				74304	0	-74304
FEMA Form 112-0-5				12260	0	-12260
FEMA Form 112-0-6				233	0	-233
FEMA Form 112-0-7				5741	0	-5741
FEMA Form 112-0-8				66251	0	-66251
FEMA Form 112-0-9				152	0	-152
FEMA Form 112-0-10				2690	0	-2690
Non-Disaster (ND) Grants System / FEMA Form 080-0-0-15				207	26,999	26792
Total(s)				184,682	26,999	-157,683

Explain:

There has been a decrease in the annual hour burden previously reported due to the FEMA Form 112 series of forms are no longer being used and has been removed from the collection. However, FEMA utilizes Standard Forms (SF) in the ND Grants System, below are the estimated burden hours for each form used.

Standard Forms	Annual Responses	Hours Per Response	Estimated Burden Hours
SF-424	1443	0.5	721.5
SF-424A	1187	1.5	1780.5
SF-424B	1187	0.5	593.5
SF-424C	1187	1.5	1780.5
SF-424D	1187	0.25	296.75
SF-LLL	1187	0.1	118.7
Total	7,378		5,291.45

A new form number has been added to the collection which is FEMA Form 080-0-0-15. This form number has been assigned to the ND Grants web-based grants management system.

Itemized Changes in Annual Burden Cost						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 112-0-2				\$46,712.00		-\$46,712.00
FEMA Form 112-0-3 A, B, C				\$171,182.43		- \$171,182.43
FEMA Form 112-0-4				\$206,971.20		-\$206,971.20
FEMA Form 112-0-5				\$139,849.29		-\$139,849.29
FEMA Form 112-0-6				\$139,561.83		-\$139,561.83
FEMA Form 112-0-7				\$229,201.44		-\$229,201.44
FEMA Form 112-0-8				\$327,225.30		-\$327,225.30
FEMA Form 112-0-9				\$29,129.28		-\$29,129.28
FEMA Form 112-0-10				\$171,853.17		-\$171,853.17
Non-Disaster (ND) Grants System / FEMA Form 080-0-0-15				\$59,312.58	\$988,053.43	\$928,740.85
Total(s)				\$1,289,832.77	\$988,053.43	\$301,779.34

Explain:

The FEMA Form 112 series of forms are no longer being used for information collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

FEMA will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.