**September 2017**

**SUPPORTING STATEMENT**

**OMB Control Number 2700‑0047**

**Type of Clearance:** Extension of a previously approved information collection

**Title of Information Collection:** Property Inventory Report – Grants with Educational and Nonprofit Entities (formerly titled Property Inventory Report)

A. Justification.

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

This collection is required to ensure proper accounting of Federal property provided under grants and cooperative agreements with instititutions of higher education and other non-profit organizations, and to satisfy external requirements for internal control of property provided by NASA or acquired with NASA funds.

The collection is necessary to comply with OMB Guidance for Grants and Cooperative Agreements, 2 CFR Chapter I and Chapter II.

**2.** **Indicate how, by whom, how frequently, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information is submitted by recipients/grants and cooperative agreement awardees to document inventory of Government-owned property on an annual basis, at the end of the grant/agreement, or upon the occurrence of certain events.

The information is used by NASA to effectively maintain an appropriate internal control system for equipment and property provided or acquired under grants and cooperative agreements with instititutions of higher education and other non-profit organizations, and to comply with statutory requirements (e.g., Chief Financial Officers Act) regarding the accountability 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. Also describe any consideration of using information technology to reduce burden.**

NASA encourages recipients to use the latest computer technology in preparing documentation. Grant and Cooperative Agreement awardees submit annual property reports via an automated NASA Form 1018 by way of the NASA Electronic Submission System (NESS). Approximately 95% of reports are submitted via electronic means.

**4. Describe efforts to identify duplication.**

Property and equipment records are unique for each grant and cooperative agreement. There is no known duplication of information.

**5. If the collection of information impacts small businesses or other small entities (Item five of form OMB 83-I, the Paperwork Reduction Act Submission form), describe any methods used to minimize burden.**

Small entities holding NASA grants or agreements must report Government-owned property in their possession. The burden on small business is the minimum consistent with applicable laws, Executive Orders, regulations, and prudent business practices.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Absence of information provided by grants and agreements would result in an inadequate internal control system, which would diminish accountability for items acquired with public funds.

**7. Explain any special circumstances that would cause an information collection to be conducted in certain manners.**

None.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR § 1320.8 (d), soliciting comments on the information collection before submission to OMB.**

The 60-day notice was published in the *Federal Register* on July 10, 2017 (82 FR 31788). No comments received from the public.

The 30-day notice was published in the Federal Register on September 28, 2017 (82 FR 45321). No comments received from the public.

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

No gifts or payments, other than remuneration, will be provided to respondents.

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

The confidentiality of this data is governed by statues, the Freedom of Information Act, and agreement provisions and special conditions. The information collected relates to Government-owned property and does not require confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

Questions of a sensitive nature will not be asked of respondents.

**12.** **Provide estimates of the hour burden of the collection of information.**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Number of Respondents | Burden to read instruction, complete, and submit reports as well as record keeping | Total Burden Hours (number of respondences x burden divided by 60 minutes) |
| Respondents submitting reportable property reports | 238 | 500 minutes | 1,983 hours |
| Total | 238 | 500 | 1,983 |

NASA estimates that 238 current awardees will have reportable property to report. Negative reports are not required. An average of 8 hours and 20 minutes for each report is estimated.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

The skill required to maintain records and prepare the property report is comparable to the GS-12 level in Government employment. Therefore, the GS-12, step 5 hourly burdened rate of $34.06 (2017) is utilized to arrive at an annual cost burden of $283.83 per recipient ($34.06 x 8 hours and 20 minutes) for property reports. Multiplying the $283.83 rate by 238 property reports results in a burden of $67,552.

**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, and any other expense that would not have been incurred without this collection of information.**

Estimated annual cost to NASA is $96,390. Agency activity includes communication with grantees, receipt and processing of the reports, accounting system entry at NASA Center and Agency levels, input to Agency Financial Statements, problem resolution, grantee training, and policy development. We estimate that NASA employees, in total, spend about 10 hours per report. We estimate that the average employee performing the functions is at the GS-13 level. Therefore, the GS-13 step 5 hourly burden rate (2017) of $40.50 was used to calculate a per report burden of $405.00. Total burden is $405.00 multiplied by the number of reports, 238, for a total of $96,390.

The change in the estimated burden costs, from the 2014 submission, reflects the relocation of this process from Headquarters, resulting in a lower cost per employee to review and process these forms.

**15.** **Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83‑I.**

There are no program changes. The changes in the estimated burden cost, from the 2014 submission, reflect an increase in the pay scale from $32.90/hour to $34.06/hour, a reduction in the number of closeout reports submitted each year, and it corrects a mathematical error in the burden costs for annual reporting. In addition, greater use of information technology has reduced the amount of time needed for recordkeeping as it relates to this collection.

**16. For collections of information intended for publication, outline plans for tabulation and publication.**

Not applicable

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

The information collection expiration date will be displayed within the PRA Statement.

18. Explain each exception to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-1.

N/A

**B. Collections of Information Employing Statistical Methods**

NASA will not employ statistical methods.