SUPPORTING STATEMENT

SEA GRANT PROGRAM APPLICATION REQUIREMENTS FOR GRANTS, FOR SEA GRANT FELLOWSHIPS, AND FOR DESIGNATION AS A SEA GRANT COLLEGE OR SEA GRANT INSTITUTE

OMB CONTROL NO. 0648-0362

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

This request is for revision and extension of a current information collection. The project record form, 90-2, is being revised, based on comments received.

The objectives of the National Sea Grant College Program, according to the Sea Grant legislation (33 USC 1121-1131) are to increase the understanding, assessments, development, utilization, and conservation of the Nation's ocean, coastal, and Great Lakes resources. It accomplishes these objectives by conducting research, education, and outreach programs.

Grant monies are available for funding activities that help attain the objectives of the Sea Grant Program. Both single and multi-project grants are awarded, with the latter representing about 80 percent of the total grant program. In addition to the SF-424 and other standard grant application requirements, three additional forms are required with a grant application. These are the Sea Grant Control Form, used to identify the organizations and personnel who would be involved in the grant; the Project Record Form, which collects summary data on projects; and the Sea Grant Budget, used in place of the SF 424a or 424c. NOAA Form 90-1, Sea Grant Control, NOAA Form 90-2, Project Record Form, and NOAA Form 90-4, the Sea Grant Budget, are approved under OMB Control No. 0648-0362. Each form provides information needed by the program but not supplied by the standard application process. The specific needs are described in Question 2 below.

The Sea Grant legislation (33 USC 1126) provides for the designation of a public or private institution of higher education, institute, laboratory, or State or local agency as a Sea Grant college or Sea Grant institute. Applications are required for designation of Sea Grant Colleges and Sea Grant Institutes. Institutions seeking designation as a Sea Grant college or Sea Grant institute must submit an application in accordance with 15 CFR 918.7. This is a one-time collection required only when a college or institution first requests to join the Sea Grant program, or when an existing program seeks to change the scope of its current designation. No forms are used. The data the collection provides helps the program officers determine the suitability of the applicant for meeting the standards and conditions for being a Sea Grant College as set forth in 33 USC

1126 and <u>15 CFR 918.5</u>. These requirements are currently cleared under OMB Control No. 0648-0362.

Applications are required in order to be awarded a Sea Grant Fellowship, including the Dean John A. Knauss Marine Policy Fellowships. The requirements are set forth annually in announcements published in the Federal Register. These requirements are currently approved under OMB Control No. 0648-0362.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Sea Grant Colleges or Institutes: The application for designation as a Sea Grant college or Sea Grant institute is required only when a college or university requests to be recognized as a Sea Grant program. Existing programs may also use the same application process to request a change in the scope of their current designation. Applications are to provide an outline of the applicant's capabilities and the reasons why it merits designation. The standards to be met are set forth in 15 CFR 918.3. The data the collection provides helps the program officers determine the suitability of the applicant for meeting the standards and qualifications for being a Sea Grant college or institute as set in the authorizing legislation.

Sea Grant Fellowships: Applications for Sea Grant Fellowships, including a Dean John A. Knauss Marine Policy Fellowship, must include a resume or curriculum vitae; a personal education and/or career goal statement; up to three letters of recommendation, including one from the student's major professor or student advisor; and a copy of undergraduate and graduate student transcripts. Depending upon the nature of the Sea Grant Fellowship, additional information may be required including a letter of endorsement from the sponsoring state Sea Grant Director; a brief description of and letter of endorsement from a required partner, if any; a project description if the fellowship is research related; and information about the student's remaining degree requirements. This information is used by program officers to evaluate the applicants and to determine which applicants will be most likely to forward the goals of the Sea Grant Program during and after the fellowship. The program seeks to support not only the best students but ones who intend to pursue related goals in the future.

Sea Grants:

The NOAA Form 90-1, Sea Grant Control, is used primarily to identify the organizations and personnel who would be involved in the proposed grant, and to collect project metrics such as number of graduate students involved. A goal of the Sea Grant program is to maximize the number of graduate students working on research projects. For funded grants, the information is used by the National

Sea Grant Office (NSGO) to collate accurate information on the number of students supported with Sea Grant funds and to summarize the impact of Sea Grants on the academic community. In addition, the form provides information on collaborations between governmental organizations, industry, and the Sea Grant program. The data supplied in this document form the basis for many of our responses to the Administration, the Congress, other agencies, and to the public about the scope of Sea Grant activities. Certain minimal summary financial data are also required to help evaluate whether the resources proposed are sufficient to achieve the goals. Much of this information is similar to biographical and other information contained in OMB Circulars A-102 and A-110, but NOAA has found it more efficient to use a form to gather this and related information.

The NOAA Form 90-2, Project Record Form requires information on the investigators involved, as well as the overall funding, objectives, methodology, and rationale for the project. The information is used by both the NSGO and the state Sea Grant programs to help determine the value of each individual project to the total program, whether matching costs are allowed, the rationale for funding and the methodology used, as well as administrative controls. The summary helps the NSGO evaluate the proposals during its funding decisions. The information is also placed on a database where both Sea Grant personnel, potential grant applicants and the public can see what other projects have been funded. This speeds the review process and reduces the chance of applicants wasting time making proposals that duplicate an existing or past project. It also provides the basic data for the next project summary for an on-going project, so that the data only has to be updated rather than resubmitted. The information required on that form is now produced with and provided to Sea Grant in electronic software format (Excel Spreadsheet) that more efficiently collect the information required to monitor and evaluate the programs. The programs send this information to the NSGO where it is added to project summary information in our database.

The NOAA Form 90-4, Sea Grant Budget, is supplements the budget information in a SF 424A Form. The SF-424 provides only a summary of costs for the entire award. It does not give a detailed breakdown of costs associated with each project in a multi-project award, and such a breakdown is necessary for these applications because the Sea Grant program awards large multi-institution omnibus grants. The Form 90-4 gives the program officer a detailed breakdown of costs for each project funded by Sea Grant and allows the officer to determine whether or not the cost of a project is reasonable based on the level of effort stated in the proposal. Without these breakdowns, it would be impossible for the program officer to efficiently monitor the use of resources or the costs associated with each project funded by the National Sea Grant College Program.

In response to Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554), NOAA has issued guidelines for ensuring and maximizing the quality of information disseminated by the agency. Information submitted to the National Sea Grant Office in grant

applications is regularly subjected to internal NSGO review as part of the grant award process. Of the various types of information collected (described above) some of the information will be disseminated to the public or used to support publicly disseminated information. Sea Grant has administrative mechanisms in place to ensure that a basic level of quality of information products is maintained. These include procedures for competitive peer review of all research grants, and performance-based evaluations of all university Sea Grant programs according to guidelines set by the NSGO.

Sea Grant is a science and education organization. It does not have regulatory responsibilities. In general, the NSGO provides summary information to the public about the grants it awards. Information is publically disseminated through the publication of reports describing Sea Grant's university-based research, education, and outreach activities. These reports are widely distributed in both print and web-based formats. All reports and supporting data are reviewed for objectivity, utility and integrity, as required by the NOAA guidelines, before they are disseminated. Previously disseminated information is reviewed on a regular basis to ensure the information is current and continues to comply with the NOAA guidelines.

3. <u>Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology</u>.

The NOAA Form 90-1, Sea Grant Control, NOAA Form 90-2, Project Summary Form, and NOAA Form 90-4, are available in electronic format. The NSGO maintains a relational database to store, archive, and retrieve information provided on these forms.

The forms are used to respond to solicitations for grant applications. All solicitations are published online at http://grants.gov. The forms, and instructions for using them, are provided in the solicitation documents at http://grants.gov, or available online at http://seagrant.noaa.gov/insideseagrant/Forms-and-Templates.

4. Describe efforts to identify duplication.

There is no similar data available from other sources.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden</u>.

These requirements have no significant impact on small businesses or entities.

6. <u>Describe the consequences to the Federal program or policy activities</u> if the collection is not conducted or is conducted less frequently.

The grant and fellowship application information is required as part of the annual grant application process and cannot be collected less frequently. The requests for Sea Grant College or Sea Grant Institute designation or change in designation is a one-time action at the respondent's discretion.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection is consistent with OMB guidelines.

8. Provide information on the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A <u>Federal Register</u> Notice soliciting comments on this information collection was published on August 25, 2017 (82 FR 40563).

Comments were also requested directly from the Sea Grant Colleges and Institutions (the academic partners of the National Sea Grant College Program, and the predominant users of these forms).

The Sea Grant Colleges and Institutions, and anyone who requested information, were told that in addition to renewing the information collection, we were planning remove a number of questions from the 90-2 form, that we did not require any more, and that we are adding one new question to address a new agency-wide research tracking requirement.

Nine messages containing 26 comments were received in response. All of the comments relating to the changes being proposed in the 90-2 form were favorable or neutral to the changes. Other comments related mainly to requests for the 90-4 form to be made available in different electronic formats, and for additional guidance to be prepared on filling out the forms. We intend to do both of these things in 2018.

A table summarizing the comments and responses is attached to this application. In addition, full text of all comments in their original form are attached to this application as a PDF file.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are made.

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

No confidentiality is promised.

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

No sensitive questions are asked.

12. <u>Provide an estimate in hours of the burden of the collection of information.</u>

The estimated number of hours for each requirement is as follows:

Form 90-1, Sea Grant Control

Estimated Number of respondents - 111 (31 institutions and 80 individuals at those institutions) Estimated Total Responses - 680 (600 for institutions*, 80 for individuals)

Average response time - 30 minutes Total Annual response time - 340 hours

Project Record Form (90-2)

Estimated Number of respondents - 111 Estimated Total Responses - 680 Average response time - 22 minutes Total Annual response time - 249 Hours

Form 90-4, Sea Grant Budget

Estimated Number of respondents - 111 Estimated Total Responses - 680 Average response time - 15 minutes Total Annual response time - 170 hours

Application for Designation as a Sea Grant College or Regional Consortia

Estimated Number of respondents - 1 Estimated Total Responses - 1 Average response time - 20 hours Total Annual response time - 20 hours

Application for Sea Grant Fellowships

Estimated Number of respondents - 50 Estimated Total Responses - 50 Average response time - 2 hours Total Annual response time - 100 hours

Collection Totals: 162 respondents, 2,091 responses, 879 hours.

* Institutions respond to multiple grant solicitations.

These estimates regarding the length of time each form takes to complete were determined from a sample of the Sea Grant Programs who are required to submit these forms.

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

Because 95 per cent of the forms are filled out and submitted electronically, the total annual cost for copying and mailing by respondents resulting from the collection is estimated to be less than \$1,000: for sending via FEDEX or similar services, at \$9.50 for 2-day delivery. The estimated cost is thus $105 \times 9.50 = 997.50 = 998$.

14. Provide estimates of annualized cost to the Federal government.

The total cost burden to the government for conducting the collections and handling the information submitted is estimated at \$95,000. This does not include costs for secondary uses of the information. This estimate is based on staff time per response of 5 minutes for the 90-1 and 15 minutes each for the Project Record Form and Sea Grant Budget. An application for designation takes about 200 man-hours to review. A fellowship application takes about 12 hours to review (4 persons at 2 hours each). A salary cost of \$60/hour was used.

15. Explain the reasons for any program changes or adjustments.

Program changes: Making the 90-2 form easier to use by removing non-required questions, and automating the summation of certain fields in the 90-4 form so the respondent doesn't have to calculate and fill them out, are estimated to save about 600 minutes in reporting burden. Adding one new question to the 90-2 form to meet a NOAA reporting requirement, and requesting semi-quantitative information about project topic areas from a small number of

respondents to better characterize those projects (where before we only asked what topic areas applied), are estimated to add about 1300 minutes of reporting burden. The net result is an increase of 2 minutes for the form, or a total of 22 hours.

16. <u>For collections whose results will be published, outline the plans for tabulation and publication</u>.

The NSGO provides summary information to the public about the grants it awards. Information is summarized and disseminated through the publication of reports describing Sea Grant's university-based research, education, and outreach activities. These reports are widely distributed in both print and webbased formats. In addition, NSGO maintains a project and accomplishment database on its public website at http://seagrant.noaa.gov/Our-Work.

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

N/A.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.