

THE SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) is requesting a renewal of, and revision to the current Uniform Project Description (UPD) OMB Control number 0970-0139, which will add statutorily mandated programs and content to the UPD. The complete list of programs is available as Attachment A. The full UPD is displayed as Attachment B.

The UPD is available for use by program offices to solicit the project description and project budget information for grants and cooperative agreements. The UPD provides a selection of text options for the program offices to choose from, which are used to communicate the application requirements for a specific grant or cooperative agreement funding opportunity announcement (FOA), as required by 45 C.F.R. § 75.203, and Appendix I to Part 75 – Full Text of Notice of Funding Opportunity, as excerpted in Attachment C.

The ability to select the appropriate standard language for a given FOA reduces the burden of application preparation, by eliminating unnecessary 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, as excerpted in Attachment C.

2. Purpose and Use of the Information Collection

ACF program offices, grants management officials, and expert non-federal and federal panel reviewers use the information provided through grant applications to select and award discretionary grants and cooperative agreements. Program offices use the information to ensure the Congressional intent of the authorizing legislation will be implemented through funded grant projects, 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 for discretionary FOAs through [the OMB-designated website, Grants.gov](http://www.Grants.gov). Subsequent to the HHS implementation of 2 CFR Part 200 at 45 CFR Part 75, where electronic application submission through Grants.gov is required at § 75.206, electronic application submission has risen from 80 percent (in 2011) to 98 percent (in 2018) 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 uses the *Search Grants* function at Grants.gov to identify a particular public assistance funding opportunity. Second, the application package is downloaded under *Applicants* at Grants.gov. Next, the applicant prepares the application package off-line, or using the Grants.gov *Workspace*, and submits the application package electronically. During this step, the applicant follows the instructions found in the UPD, which is found in *Section IV.2. Content and Form of Application Submission, The Project Description* of the FOA. Last, Grants.gov allows the applicant to track the status of the submitted application using *Track Your Application*.

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 published in the *Federal Register* on May 1, 2018, (Volume 83, Number 84) page number 19066, soliciting comments to the proposed UPD. No comments were received.

The active pool of ACF discretionary grantees includes approximately 3,800 State, Local or Tribal Governments, nonprofit and for-profit organizations, and institutions of higher education.

Because the grant establishes a relationship between ACF and applicants and grantees, consultation with the community is a necessary and ongoing process. Through this relationship, feedback from applicants and grantees on the availability of data, frequency of collection, and clarity of instructions and recordkeeping, disclosure, reporting format, and the data elements to recorded, disclosed or reported is routinely obtained. This typically occurs through routine inquiries, pre- and post-award activities, and grant closeout and through continuous dialogue between ACF and applicants and grantees.

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

<https://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.*

GrantSolutions.gov

All electronically-submitted applications are transmitted from Grants.gov directly into the GrantSolutions.gov grants management system. Through this system, grantees may see their grant files as well as submit and track requests for changes and continuations to projects.

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 the HHS Rules of Behavior for Use of HHS Information Resources at:

https://www.hhs.gov/about/agencies/asa/ocio/cybersecurity/rules-of-behavior-for-use-of-hhs-information-resources/index.html#_ftn1

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 -the [HHS Grants Policy Statement \(GPS\)](#), provides the consolidated terms and conditions for HHS discretionary awards, including requirements for submitting applications in response to HHS notices of funding opportunities. 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.

Attachment D

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 done 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 the 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 Principal Investigator/Project Director (PI/PD) 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 46 statutorily mandated ACF programs for project grants and cooperative agreements.

Based on reports of anticipated applications submitted response in to FOAs for fiscal years 2016, 2017, and 2018; ACF estimates an average of 4,170 applications will be submitted annually. On average the burden hours per response is 60 hours. The frequency is once, when the applications are solicited through the FOA. Therefore, the total hourly burden annually is expected to be 250,200 hours. Hourly burden for the SF 424 series of forms is covered under a separate OMB information collection clearance.

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours
UPD	4,170	1	60	250,200

Attachment A displays a list of programs with their associated burden totals.

The estimated annualized cost as to the respondents (other than individuals and households) as a monetary value, for hour burdens associated with collection of information is 250,200 hours times \$50 per hour or \$12,510,000.

For example, the response for Social and Human Services Assistants with 100 hours of burden:

The job code is 21-1093 and wage data from May 2017 is \$17.50 per hours. Therefore to account for fringe benefits and overhead the rate is multiplied by two which is \$34.10. The estimate of annualized cost to respondents for hour burden is \$34.10 times 100 or \$3,410.

<https://www.bls.gov/oes/current/oes211093.htm>

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 using 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 question number 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 4,170, which equates to 83,400 hours of staff time. Based on an average of \$50 per hour, in monetary terms this equates to \$4,170,000. 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

The current number of responses and burden hour estimates are based on a review of the numbers of anticipated applications for Fiscal Years 2016, 2017, and 2018. Differences in burden estimates occur between approval periods because each program may not necessarily re-compete in each year of the three year approval period. In addition, new programs, and their estimated burden, were added during the 2016-2019 approval period. Also, CFDA numbers that were deactivated and archived during the 2016-2019 approval period have been deleted, along with their estimated burden hours. Revisions to these estimates are reflected in Attachment A.

There were 4,633 estimated total responses in the 2016-2019 approval period, and 4,170 estimated total responses for the 2019-2022 requested approval period, which results in a decrease of 463 estimated total responses. The total burden hours for the 2016-2019 approval period is 277,980 hours; and the total burden hours for the 2019-2022 approval request period is 250,200 hours; which is a decrease of 27,780 burden hours. There is no cost burden on respondents.

ACF has added the following four programs for use with the 2019-2022 UPD:

CFDA Number	Program Title
93.356	Head Start Disaster Recovery from Hurricanes Harvey, Irma, and Maria
93.434	Every Student Succeeds Act/Preschool Development Grants
93.475	TANF Policy Academy for Innovative Employment Strategies (PAIES)
93.787	Title V Sexual Risk Avoidance Education Program (Discretionary Grants)

Attachment D

During the 2016-2019 approval period, the following three programs have been deactivated, archived, or are no longer in use for the UPD, and have been deleted from the listing of programs approved for use under the UPD:

CFDA Number	Program Title
93.075	Systems Interoperability Health and Human Services
93.076	TANF Program Integrity Innovation Grants
93.095	HHS Programs for Disaster Relief Appropriations Act – Non Construction

Narrative Changes to the UPD

Changes to the UPD narrative are editorial and consist of streamlining the instructions where needed, and also strengthening instructions where necessary. To improve ease of UPD use and provide clarification in various sections of the UPD, text boxes which allow the PO to insert specific information were added or deleted, text options which were previously optional now prepopulate, text options have been rearranged to flow more logically, and certain text options have been combined to aid readability.

The more significant changes to the UPD narrative are as follows:

- 1). Under Guidance for Use (How the UPD is Used) – re-ordered the list of text options that provide a text box for the PO to insert program specific information. Removed Expected Outcomes from the list as it no longer has a text box for the PO to insert program specific information but standard language may still be selected. Added Logic Model to the list as it now has a text box.
- 2). Other Information Collection in FOAs – streamlined the entire section. Deleted information about why the UPD is not used for mandatory grant programs.
- 3). Project Description Overview – consolidated Purpose, General Expectations and Instructions, and General Instructions for Preparing a Full Project Description into one section titled General Expectations and Instructions. Re-ordered the text options to represent a more logical flow. Added a text option and text box to Legal Status of Entity for small businesses and for-profit entities. Divided Objectives and Need for Assistance into two separate text options. Objectives has a text box to allow the PO to insert program specific information, Need for Assistance does not have a text box. Removed the text box for Expected Outcomes, the PO can select standard language but cannot insert program specific language. Added a text box for Logic Model so the PO can include program specific information. Added a text box to Organizational Capacity and included an optional instruction which allows the PO to request current and pending grant support from applicants, and included instructions for drafting FOAs with multiple funding sources.

4). Budget and Budget Justification – added sub-heading titled The Project Budget and Budget Justification. Under the General sub-heading, text options which were previously optional now prepopulate and appear in all FOAs.

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.

1. Respondent Universe and Sampling Methods
Not applicable.
2. Procedures for the Collection of Information
Not applicable.
3. Methods to Maximize Response Rates and Deal with Nonresponse
Not applicable.
4. Test of Procedures or Methods to be Undertaken
Not applicable.
5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data
Not applicable.