



**DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220**

January 24, 2019

TO: Shagufta Ahmed, Office of Information and Regulatory Affairs

FROM: Bridgette Kilkenny, Acting Deputy Assistant Secretary for Privacy, Transparency, and Records *Bridgette Kilkenny*

SUBJECT: Justification for Emergency Processing; Financial Recordkeeping and Reporting for the Social Impact Partnerships to Pay for Results Act (SIPPRa) grants program

Authorized under the Bipartisan Budget Act of 2018, the Social Impact Partnerships to Pay for Results Act (SIPPRa), amends Title XX of the Social Security Act, 42 U.S.C. 1397 et seq., to provide \$100 million in funding to implement "Social Impact Partnership Demonstration Projects" (projects). SIPPRa authorizes the Secretary of the Treasury to enter into award agreements with state or local governments for projects addressing entrenched social problems, and mandates that Treasury, in consultation with the Federal Interagency Council on Social Impact Partners, chaired by the Director of OMB, publish a request in the *Federal Register* seeking project proposals no later than February 9, 2019. 42 U.S.C. 1397n-1(a). Treasury is requesting emergency processing of an Information Collection Request covering applications for SIPPRa grant funding by January 29, 2019 in order to publish a Notice of Funding Availability (NOFA) seeking project applications by no later than this statutory deadline.

The SIPPRa program presents a complex new financing model and has required input from several federal agencies and other stakeholders in order to work out several unique policy considerations—this activity that has taken a substantial amount of time and was requisite before the NOFA could be drafted. For these reasons, normal clearance procedures cannot be followed. The inability to expeditiously collect this information will be in derogation of the statutory mandate to publish a request for proposals in the *Federal Register* on or before February 9, 2019, and will delay the implementation of a program that stakeholders are anxious to see realized.

Treasury has not been able to consult with the public about the burden estimates for this submission; however, Treasury's Office of Economic Policy conducted due diligence on the issue and reported that the per respondent burden estimates under this NOFA are in line with similar funding opportunities. All efforts have been made to minimize burden on eligible applicants. Treasury requests a waiver of the requirement to seek public comment via a *Federal Register* notice during OMB review due to the Federal Government shutdown and the short timeframe for OMB review. Treasury plans to publish request for comments in the *Federal Register* upon the reopening of the Federal government.