

Department of the Treasury  
Information Collection Request – Supporting Statement

Application, Reports and Recordkeeping for the Social Impact Partnerships to Pay for Results  
Act (SIPPRA) grants program  
OMB No. 1505-0260

**A. Justification**

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

Authorized under the Bipartisan Budget Act of 2018, the Social Impact Partnerships to Pay for Results Act (SIPPRA or Act), 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) and feasibility studies to assist states and local governments in applying for project funding. SIPPRA authorizes the Secretary of the Treasury (Secretary) to enter into award agreements with state or local governments for projects addressing entrenched social problems. SIPPRA requires the Department of the Treasury (Treasury) to conduct a request for proposals for projects, make award decisions, and enter into project award agreements. Treasury is publishing a Notice of Funding Availability (NOFA) seeking applications for projects, and anticipates that ten or more persons will respond to its notice announcing availability of funding for SIPPRA projects.

Although Treasury is asking applicants to use the SF-424 family of common forms for their applications, in order to effectively and efficiently assess and evaluate applications and ensure that projects comply with statutory requirements, Treasury is also soliciting additional detailed information from applicants. This request only includes the burden for this additional information. The burden for the SF-424 forms is covered under OMB Control Numbers 4040-0004, 4040-0006, 4040-0007, 4040-0008, 4040-0009, 4040-0010 and 4040-0013. The additional information includes the following components:

- Notice of Intent to Apply;
- Project Narrative, to include an Executive Summary;
- Project Narrative Attachments, to include project budget, partnership agreements, partner qualifications, independent evaluator qualifications, evaluation design plan, independent evaluator contract, outcome valuation (for which Treasury’s SIPPRA website will provide a tool to assist applicants), legal compliance, and (optional) additional supporting documentation such as a preexisting feasibility study;
  - The evaluation design plan is discussed further below
- DUNS Number and SAM registration;
- Copy of application proposing privileged or confidential information to be redacted;
- Administrative Reporting, including Annual Performance Report, Evaluation Progress Reports, and Final Evaluation Report;
- Records Retention

### Evaluation Design Plan

The evaluation design plan (EDP) is critical for several reasons and is required by the statute; for example, one of the seven delineated purposes of SIPPPRA is to “incorporate outcomes measurement and [RCT] or other rigorous methodologies for assessing program impact.” 42 U.S.C. § 1397n. It would not be possible to adequately evaluate an applicant’s ability to implement an intervention that can be studied in a rigorous way such that the effect of the intervention is not due to chance or other economic conditions or circumstances, and is only caused by the intervention, without an evaluation design plan. The need is explicit in SIPPPRA at § 1397n-1(c)(19), (20), and (21), all of which have been incorporated into Treasury’s request in its NOFA for an evaluation design plan.

Treasury asks that applicants include 17 discrete pieces of information in their EDP. These components, described in the NOFA, are essential to assessing the quality of the proposed EDP and the potential to generate causal estimates of the intervention (see above). The NOFA also directs applicants to describe their evaluation methodology (RCT or quasi-experimental) and evidence standards as required by statute.

Further, SIPPPRA also requires that the federal government pay a recipient only after an independent evaluator determines a project “has met the requirements specified in the agreement and achieved an outcome as a result of the intervention.” § 1397n-2(c)(2). It also establishes a Federal Interagency Council on Social Impact Partnerships (Interagency Council), chaired by the Director of OMB, with ten members representing ten Federal agencies.<sup>1</sup> Among their responsibilities, the Council must:

prior to approval by the Secretary, certify that each State and local government application for a social impact partnership contains rigorous, independent data and reliable, evidence-based research methodologies to support the conclusion that the project will yield savings to the State or local government or the Federal Government if the project outcomes are achieved;

certify to the Secretary that each State or local government that has entered into an agreement with the Secretary for a social impact partnership project under this division and each evaluator selected by the head of the relevant agency under section 1397n-4 of this title has access to Federal administrative data to assist the State or local government and the evaluator in evaluating the performance and outcomes of the project; and

certify to the Secretary, in the case of each approved social impact partnership that is expected to yield savings to the Federal Government, that the project will yield a projected savings to the Federal Government if the project outcomes are achieved, and coordinate with the relevant Federal agency to produce an after-action accounting once

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<sup>1</sup> The head of each of the following federal agencies shall designate one officer or employee to be a Council member: Department of Labor, Department of Health and Human Services, Social Security Administration, Department of Agriculture, Department of Justice, Department of Housing and Urban Development, Department of Education, Department of Veterans Affairs, Department of the Treasury, Corporation for National and Community Service. § 1397n-5(b).

the project is complete to determine the actual Federal savings realized, and the extent to which actual savings aligned with projected savings<sup>2</sup>

The EDP is essential to ensure that these statutory goals and objectives are achieved and to assist the Interagency Council in making its certification determinations.

### Independent Evaluator Reports

SIPPRA requires the federal government to complete certain project evaluation duties, including the collection from award recipients of periodic project outcome evaluation reports produced by each project's independent evaluator. SIPPRA § 1397n-4(d) and (e).

### OIRA Terms of Clearance

Treasury acknowledges the Terms of Clearance OMB issued on February 12, 2019 related to the SIPPRA program and agrees to take such Terms of Clearance into consideration when issuing a subsequent Notice of Funding Availability, a revision to this Information Collection Request, or a subsequent Information Collection Request in the future.

### USE OF DATA

Treasury published a Notice of Funding Availability on February 21, 2019 under citation 84 FR 5560 soliciting applications for projects under SIPPRA. The information collected under this NOFA: (1) identifies eligible recipients and activities; (2) helps identify which applications sufficiently address all statutory requirements and which proposed projects are the most competitive; (3) determines the appropriate amount of funding; (4) ensures compliance with SIPPRA and Federal laws and policies on grants (*Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR 200, herein OMB Uniform Guidance*); (5) tracks recipients' progress; and (6) collects statutorily mandated reports prepared by recipients' contracted independent evaluators.

The Notice of Intent is optional; it will assist Treasury and the Interagency Council in determining the number of applications it will receive, and thus, enable them conducting intake and evaluation of applications as efficiently and economically as possible.

The application Executive Summary will assist Treasury and the Interagency Council in streamlining the processing of applications and in optimizing the eligibility phase of application review. The application Standard Forms, Project Narrative, and Project Narrative attachment components of the grant application are intended to provide Treasury with the information necessary to properly evaluate and assess applications and to make sure applications include statutorily mandated information. Additionally, certain components of the application, and in particular, the Outcome valuation, will enable the Interagency Council to determine whether to make statutorily mandated certifications regarding the proposed projects.

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<sup>2</sup> § 1397n-5(a).

The DUNS number and the SAM registration are both required under Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR Part 200.

To comply with Uniform Guidance performance and financial monitoring and reporting requirements, 2 CFR 200.327–200.329, Treasury is requiring an annual performance and financial report from grant recipients. SIPPPRA requires that recipients submit progress reports prepared by an independent evaluator on a periodic basis and before the schedule time of outcome payments. SIPPPRA § 1397n-4(d). SIPPPRA also requires that recipients submit a final report prepared by an independent evaluator within six months of a project’s completion. SIPPPRA § 1397n-4(e). Per the statute, Treasury and the Interagency Council will use these reports to determine if outcome payments are warranted.

Treasury is requiring recipients under this NOFA to comply with the Uniform Guidance’s record retention requirement, 2 CFR 200.333, which requires them to maintain records for three years after grant close-out.

### 3. USE OF INFORMATION TECHNOLOGY TO REDUCE BURDEN

Treasury will manage the application submission process with the use of the Sales Force software system as customized for the SIPPPRA program. Eligible recipients complete fillable forms and return the grant application electronically via Grants.gov. Eligible recipients enter progress information on fillable forms and submit the progress reports electronically through Sales Force automated grants system. Data from grant applications and reports are stored electronically.

### 4. EFFORTS TO IDENTIFY DUPLICATION

This information collection is for a new, statutorily mandated grant program. The information is not known to overlap with any other data collected under any other information collections at Treasury.

### 5. IMPACT ON SMALL BUSINESSES AND ENTITIES

This collection of information is not expected to have a significant impact on small entities. The applications are limited to certain states, local governments and tribes named as eligible entity recipients in SIPPPRA. SIPPPRA does not contain any provisions permitting Treasury to modify requirements for local governments that may be considered “small entities.” However, all efforts have been made to minimize burden on small entities therein.

### 6. CONSEQUENCES OF LESS FREQUENT COLLECTION AND OBSTACLES TO REDUCE BURDEN

Collection is at a minimum: Applicants will submit grant applications following requests for project applications; periodic reporting will enable the Federal government to assess progress of the activity under the grant; and, as mandated by SIPPPRA § 1397n-4(d) and (e), periodic project

evaluation reports, prepared by independent evaluators must be submitted by grant recipients. Treasury would not be able to adhere to SIPPRAs requirements with less frequent collections.

7. SPECIAL CIRCUMSTANCES REQUIRING DATA COLLECTION TO BE INCONSISTENT WITH GUIDELINES 5 CFR 1320.5(d)(2).

There are no special circumstances requiring data collection to be inconsistent with Guidelines in 5 CFR 1320.5(d)(2).

8. FEDERAL REGISTER NOTICE/CONSULTATION WITH THE PUBLIC

Treasury published a notice in the Federal Register to solicit comments on February 1, 2019 in 84 FR 1281. Treasury received no comments.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

No payments or gifts are provided to respondents.

10. ASSURANCE OF CONFIDENTIALITY

SIPPRAs establishes a Commission on Social Impact Partnerships (Commission) whose principal obligation is to make recommendations to Treasury regarding the funding of SIPPRAs demonstration project and feasibility studies. SIPPRAs § 1397n-6. The Commission is subject to the provisions of the Federal Advisory Committee Act (FACA), which generally requires that documents made available to the Commission be made available for public inspection and copying. 5 U.S.C. App. 2 10(b). Treasury expects to provide to the Commission all complete applications received under this NOFA from eligible applicants and expects to make these applications available for public inspection and copying. However, FACA also provides that trade secrets and commercial or financial information that is privileged or confidential under the Freedom of Information Act (confidential business information) need not be made publicly available. 5 U.S.C. 552(b)(4). To assist Treasury in complying with FACA's public disclosure requirements while protecting confidential business information in accordance with FACA, Treasury is requesting applicants to propose redactions of confidential business information. An applicant may omit pages for which it does not propose any redactions. Treasury will review the redactions proposed by each applicant. The Department provides no other assurances of confidentiality to respondents.

SIPPRAs requires that certain information related to grants be published on a website, available to the public, to be established and maintained by the Interagency Council. SIPPRAs § 1397n-10. Treasury's SIPPRAs website will link to this website and thus will also include this information.

SIPPRAs requires that the independent evaluators for projects conducted under SIPPRAs grants submit periodic written progress reports and a final written report to the Interagency Council and the head of the relevant agency, which in turn are required to submit the reports to the Secretary of the Treasury and the committee of jurisdiction of the House of Representatives and the Senate.

SIPPRA § 1397n-4. These reports may be made available to the public under the Freedom of Information Act, 5 U.S.C. 552.

#### 11. JUSTIFICATION OF SENSITIVE QUESTIONS

No sensitive questions are asked of respondents. Applicants must provide qualifications of key project personnel and partners. They may voluntarily provide curriculum vitae for key project personnel and partners, but the application does not require that personally identifiable information (PII) is collected.

12. ESTIMATE OF THE HOUR BURDEN OF THE COLLECTION.

Social Impact Partnerships to Pay for Results Act (SIPPRA) Application Materials and Recordkeeping burden.

<b>Reporting</b>	<b># Respondents</b>	<b># Responses Per Respondent</b>	<b>Total annual Responses</b>	<b>Hours per response</b>	<b>Total Burden in Hours</b>	<b>Cost to Respondent (@ \$53.03 per hr.<sup>3</sup>)</b>
Notice of Intent to Apply	50	1	50	1	50	\$2,651
Application: -Project Narrative & Attachments	50	1	50	40	2,000	\$106,060
Intervention Project Activity Milestones Report	5	1	5	2	10	\$530
Intervention Project Activity Status of Performance Report	5	1	5	8	40	\$2,121
<b>Total Reporting</b>	<b>110</b>	<b>4</b>	<b>110</b>	<b>51</b>	<b>2,100</b>	<b>\$111,362</b>
<b>Recordkeeping</b>	<b># Record keepers</b>	<b># Responses Per Respondent</b>	<b>Total annual Responses</b>	<b>Hours per response</b>	<b>Total Burden</b>	<b>Cost to Respondent (@ \$53.03 per hrs.)</b>
Application – Intervention Projects Funded	5	1	5	8	40	\$2,121
Intervention Projects - Implementation	5	1	5	10	50	\$2,651
<b>Total Recordkeeping</b>	<b>10</b>	<b>2</b>	<b>10</b>	<b>18</b>	<b>90</b>	<b>\$4,772</b>
<b>Total Burden</b>	<b>120</b>	<b>6</b>	<b>120</b>	<b>69</b>	<b>2,190</b>	<b>\$116,134</b>

<sup>3</sup> Average Employer Cost per hour for State and Local Government employees, per Bureau of Labor Statistics, *Employer Costs For Employee Compensation – September 2018*, <https://www.bls.gov/news.release/eccec.t03.htm>

13. Estimated total annual cost burden to respondents

There are no annualized capital/startup costs for the eligible recipients to provide the information collection for the NOFA. Receiving grant awards under SIPPPRA specifically does not require grantees to incur startup costs beyond those costs generally associated with receiving federal financial assistance. However, SIPPPRA §1397n-2(d) and (e) require that recipients contract with independent evaluators who are to prepare progress reports and final reports, respectively, to be submitted to the Interagency Council and the head of the relevant agency. The amount of time and cost of these reports will vary depending on factors such as the size and length of the project, the type of intervention, whether a randomized controlled trial or a quasi-experimental method (both methods permitted under SIPPPRA) are selected, and geographic area. As explained in the NOFA, SIPPPRA permits the federal government to pay up to 15% of the overall project award amount to a recipient for the cost of its independent evaluation activity; the aggregate cap on evaluation funds under this NOFA is \$9,145,000.

14. Estimated cost to the federal government.

SIPPPRA permits Treasury to allocate \$2 million annually from the SIPPPRA appropriation for program administrative and operating expenses, which include the software Treasury will use to support the grant application process and application review activities.

15. Reasons for change in burden

The total burden requested for this new Information Collection Request is 2,190 hours. This collection of information is due to a new statutory requirement imposed by SIPPPRA.

The information Treasury is proposing to collect is already set forth in the NOFA published on February 21, 2019 (the First Project NOFA). Treasury does not expect the revision to impose any additional burden. Further, this revision is primarily about collecting the post-award reporting set forth in the First Project NOFA and relates solely to the First Project NOFA. The post-award collection would include assessments of the value of the intervention(s) to the federal government by independent evaluators using the same methodology requested by Treasury in the SIPPPRA applications submitted in response to the First Project NOFA.

The Notice of OMB Action approving a new collection for SIPPPRA on an emergency basis dated February 12, 2019 expires on August 31, 2019. Treasury submitted its revision request to extend the deadline to be able to collect the post-award reporting set forth in the First Project NOFA. The revision request for an extension of the deadline is not a request to authorize the issuance of a subsequent NOFA.

16. Plans for tabulation, statistical analysis and publication

SIPPPRA §1397n-2(d) requires Treasury to publish, within 30 days of making an award, a notice in the Federal Register with certain information about the award. See Appendix B. Additionally, SIPPPRA §1397n-10 requires that the Interagency Council “establish and maintain a public website” that displays information about SIPPPRA projects, listed in Appendix C.



Treasury also anticipates conducting analysis of project data. These analyses will include assessments of eligibility and effectiveness of program activities (e.g. types of activities, amounts funded) as well as compliance checks.

Pursuant to SIPBRA §1397n-2(d) and (e), progress reports and final reports, respectively, prepared by independent evaluators must be submitted to the Interagency Council and the head of the relevant agency, and in turn, to Treasury and each committee of jurisdiction in the House of Representatives and the Senate.

Treasury anticipates that federal oversight bodies, such as GAO and Treasury's OIG, will also review and analyze data within these reports.

17. Display of the expiration date for OMB approval

Upon approval by OMB, Treasury plans to display the expiration date for OMB approval of the information collection on all instruments. Treasury believes that displaying expiration dates on these instruments before OMB approval would be confusing to applicants for and recipients of SIPBRA grants.

18. Exceptions to certification statement

There are no exceptions to the certification statement.

## **Appendix A – Project outcomes**

SIPPRA § 1397 n-1(b) requires that a project must produce one or more measurable, clearly defined outcomes that result in social benefit and Federal, State, or local savings in one of the following ways:

1. Increasing earnings and work by individuals in the United States who are unemployed for more than 6 consecutive months.
2. Increasing employment in earnings of individuals who have attained 16 years of age but not 25 years of age.
3. Increasing employment among individuals receiving Federal disability benefits.
4. Reducing the dependence of low-income families on Federal means-tested benefits.
5. Improving rates of high school graduation.
6. Reducing teen and unplanned pregnancies.
7. Improving birth outcomes and early childhood health and development among low-income families and individuals.
8. Reducing rates of asthma, diabetes, or other preventable diseases among low-income families and individuals to reduce the utilization of emergency and other high-cost care.
9. Increasing the proportion of children living in two-parent families.
10. Reducing incidences and adverse consequences of child abuse and neglect.
11. Reducing the number of youth in foster care by increasing adoptions, permanent guardianship arrangements, reunifications, or placements with a fit and willing relative, or by avoiding placing children in foster care by ensuring they can be cared for safely in their own homes.
12. Reducing the number of children and youth in foster care residing in group homes, child care institutions, agency-operated foster homes, or other non-family foster homes, unless it is determined that it is in the interest of the child's long-term health, safety, or psychological well-being to not be placed in a family foster home.
13. Reducing the number of children returning to foster care.
14. Reducing recidivism among juvenile offenders, individuals released from prison, and other high-risk populations.
15. Reducing the rate of homelessness among our most vulnerable populations.

16. Improving the health and well-being of those with mental, emotional, and behavioral health needs.
17. Improving the educational outcomes of special-needs or low-income children.
18. Improving the employment and well-being of returning United States military members.
19. Increasing the financial stability of low-income families.
20. Increasing the independence and employee ability of individuals who are physically or mentally disabled.
21. Other measurable outcomes defined by the state or local government that result in positive social outcomes and Federal savings.

42 U.S.C. § 1397n-1(b).

### **Appendix B –Publication of Award in Federal Register**

SIPPRA provides that not later than 30 days after entering into an agreement for an award, Treasury must publish a notice in the *Federal Register* that includes the following information about the award:

1. The outcome goals of the project.
2. The target population that will be served by the project.
3. A description of each intervention in the project.
4. The expected social benefits to participants who receive the intervention and others who may be impacted.
5. The detailed roles, responsibilities, and purposes of each federal, State, or local government entity, intermediary, service provider, independent evaluator, investor, or other stakeholder.
6. The payment terms, the methodology used to calculate outcome payments, the payment schedule, and performance thresholds.
7. The project budget.
8. The project timeline.

9. The project eligibility criteria.
10. The evaluation design.
11. The metrics that will be used in the evaluation to determine whether the outcomes have been achieved as a result of each intervention and how these metrics will be measured.
12. The estimate of the savings to the federal, State, and local government, on a program-by-program basis and in the aggregate, if the agreement is entered into and implemented and the outcomes are achieved as a result of each intervention.

42 U.S.C. § 1397n-2(d).

### **Appendix C –SIPRA Website**

The Federal Interagency Council on Social Impact Partnerships shall establish and maintain a public website that shall display the following:

- (1) A copy of, or method of accessing, each notice published regarding a social impact partnership project pursuant to this division.
- (2) A copy of each feasibility study funded under this division.
- (3) For each State or local government that has entered into an agreement with the Secretary for a social impact partnership project, the website shall contain the following information:
  - (A) The outcome goals of the project.
  - (B) A description of each intervention in the project.
  - (C) The target population that will be served by the project.
  - (D) The expected social benefits to participants who receive the intervention and others who may be impacted.
  - (E) The detailed roles, responsibilities, and purposes of each Federal, State, or local government entity, intermediary, service provider, independent evaluator, investor, or other stakeholder.
  - (F) The payment terms, methodology used to calculate outcome payments, the payment schedule, and performance thresholds.
  - (G) The project budget.
  - (H) The project timeline.
  - (I) The project eligibility criteria.
  - (J) The evaluation design.
  - (K) The metrics used to determine whether the proposed outcomes have been achieved and how these metrics are measured.
- (4) A copy of the progress reports and the final reports relating to each social impact partnership project.

(5) An estimate of the savings to the Federal, State, and local government, on a program-by-program basis and in the aggregate, resulting from the successful completion of the social impact partnership project.

42 U.S.C. § 1397n-10.