

SUPPORTING STATEMENT
OMB Control Number 2700-0092

INFORMATION COLLECTION TITLE: Financial Assistance Awards/Grants and Cooperative Agreements

INFORMATION COLLECTION TYPE: Revision of a currently approved information collection

A. JUSTIFICATION.

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

This collection is required to ensure proper accounting of Federal funds and property awarded under financial assistance awards (grants and cooperative agreements). Reporting and recordkeeping are prescribed at 2 CFR 200 and 2 CFR 1800 for awards issued to non-profits, institutions of higher education, government, and commercial firms when cost sharing is not required and 14 CFR Part 1274 for awards issued to commercial firms when cost sharing is required.

2. Indicate how, by whom, how frequently, and for what purpose the information will be used.

Information collected will be used by the NASA Office of the Chief Financial Officer (CFO) and the NASA Shared Services Center (NSSC). Absence of the information provided by grant recipients by means of the following proposals, reports, and recordkeeping would result in NASA's inability to carry out its mission and to comply with statutory requirements e.g., the Chief Financial Officers (CFO) Act, on the accountability of public funds and maintenance of an appropriate internal control system.

The following table depicts projected information collection frequency and its intended use:

INFORMATION/ REPORTS	FREQUENCY	USE
Proposals	Occasionally	Select qualified recipients
Invoices	Milestones	Report expenditures
Property Reports	Annually	Report to Congress
Patent & New Technology Reports	Annually	Protect rights of Government & recipients
Performance/Progress Reports	Annually	Assess progress
Changes to grant award including budget reallocations and foreign national updates	Occasionally	Determine recipient control of funds and property and protect U.S. property interests
Recordkeeping	Continuous	Ensure proper accounting of 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.

Proposals are submitted through the NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES) or Grants.gov. The use of these systems reduces the need for proposers to submit multiple copies to the agency. It allows proposers to submit multiple proposals to different funding announcements without registering each time. Electronic funds transfer is used for payment under Treasury guidance, for commercial firms and through the HHS Payment Management System (PMS) for other recipients. In addition, NASA encourages the use of computer technology and is participating in government-wide efforts to extend the use of information technology to more agency grant-related processes.

4. Describe efforts to identify duplication.

Each financial assistance award is a unique project, therefore there is no known duplication of information.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

The burden on small business has been minimized by decreasing the frequency of reporting 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 collection or reductions in the frequency of collections could jeopardize the proper accountability of public funds and property.

7. Explain any special circumstances that would cause an information collection to be conducted in certain manners as listed on the 83-I form.

No circumstances apply.

8. 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.

60-day FRN: Published on April 15, 2019, Number 19-016, Vol. 84, No. 72, pages 15234-15235. No comments were received from the public.

30-day FRN: Published on August 14, 2019, Number 19-045, Vol. 84, No. 157, page 40438-40439. No comments were 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 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 information in this collection is not subject to the Privacy Act. An Initial Privacy Threshold Analysis (IPTA) was completed and the analysis determined that due to the nature of the collection, a Privacy Impact Assessment (PIA) is not required at this time. When a substantial change is made, the IPTA will be updated and a reassessment will be conducted.

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.

No questions of a sensitive nature are involved.

12. Provide estimates of the burden hour associated with the collection of information.

The annual burden estimate of 912,641 hours, associated with the collection of information, is calculated as follows:

INFO and REPORTS	No. of Respondents	No. of Responses	Hours per Report	TOTAL HOURS	Hourly Rate	Cost
Proposals	11,000	11,000	50	550,000	\$35.02	\$19,261,000.00
Request for Payment	120	480	8	3,840	\$35.02	\$134,476.80
Financial Reports SF 425	6,500	26,000	9	234,000	\$35.02	\$8,194,680.00
Property Reports	120	120	1	120	\$35.02	\$4,202.40
Patent/New Technology Reports	6,175	6,175	.167	1,031.225	\$35.02	\$36,113.50
Patent/New Technology Reports	425	425	8	3,400	\$35.02	\$119,068.00
Performance Reports	6,500	6,500	8	52,000	\$35.02	\$1,821,040.00
Changes, including	1,625	1,625	2	3,250	\$35.02	\$113,815.00

subcontracts and foreign nationals						
Recordkeeping	6,500	6,500	10	65,000	\$35.02	\$2,276,300.00
TOTALS	38,965	58,825	10.685	912,641.225	35.02	\$31,960,695.70

There are approximately 6,500 financial assistance awards open at any one time. It is estimated that out of the approximately 11,000 proposals received each year, NASA awards approximately 1,400 new awards. The period of performance for these financial assistance awards is usually three to five years. NASA had approximately 120 awards with commercial firms. Commercial firms submit quarterly payment requests, directly to NASA, while other recipients submit Federal Financial Reports (SF 425) each quarter to the HHS Payment Management System (PMS). Performance, Property, and Patent Reports are filed annually. Historical records indicate that on average 1,625 changes are submitted annually.

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

Total annual cost burden is estimated to be \$31,960,695.70. This figure is derived by applying a burdened labor rate of \$35.02 to the total number of 912,641 hours. This rate of \$35.02 is for a GS-12, step 5 (2019) as this is the comparable skill level that would be required to perform these duties.

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.

	TOTAL RESPONSES/YEAR	HOURS PER REPORT	TOTAL HOURS	HOURLY PAY RATE	TOTAL COST/YEAR
Proposals	11,000	50	550,000	\$49.21	\$27,065,500.00
Request for payment	480	0.5	240	\$35.02	\$8,404.80
Property reports	120	1	120	\$117.00	\$14,040.00
New tech reports	6,175	0.167	1,031.225	\$35.02	\$36,113.50
Performance reports	6,500	4	26,000	\$49.21	\$1,279,460.00
Modifications	1,625	5	8,125	\$41.64	\$338,325.00
Recordkeeping	6,500	10	65,000	\$41.64	\$2,706,600.00
Financial	26,000	0.167	4,342	\$35.02	\$152,056.84

reports					
New tech reports	425	1	425	\$49.21	\$20,914.25
TOTAL	58,825	7.98	655,283.225	50.33	\$31,621,414.39

A burdened labor rate varies depending on task. Labor costs ranges from \$117/hour charged to review and process property reports to \$35.02/hour, equivalent to a GS 12 step 5. The government employee rate used is considered an appropriate skill level for the tasks to be performed.

Estimated annual cost to the Government is **\$31,621,414.39**.

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

There have been no program changes. Reported adjustments correspond to changes in occupational pay scales as reported by the Office of Personnel Management (OPM) and an adjustment to the number of respondents submitting proposals.

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

There are no collections of information intended for publication to report on for this information collection.

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.

NASA is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain all exceptions to the “Certification for Paperwork Reduction Act Submissions.”

The NASA OCFO Policy Division sponsors this information collection. NASA does not take exception to the content of 5 CFR1320.9 and the related provisions of 5 CFR 1320.8(b)(3).

Lakisa Carter, NASA HQ OCFO – Policy Division

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.