

ACF Performance Progress Report - Program Indicators

**OMB Information Collection Request
0970 - 0406**

Supporting Statement Part A - Justification

October 2019

Submitted By:
Office of Grants Management
Administration for Children and Families
U.S. Department of Health and Human Services

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Office of Grants Management (OGM), in the Administration for Children and Families (ACF) is proposing the continued collection of program performance data for ACF's discretionary grantees. In 2016, OGM developed a form to collect this data based on the basic template of the OMB-approved reporting format of the Program Performance Report. OGM now seeks to renew the ACF-OGM-SF-PPR-B for continued use by ACF with no changes to the form.

The requirement for grantees to report on performance is OMB grants policy. Specific citations are contained in: (1) 2 CFR 215 Uniform Administrative Requirements, cost Principles, and Audit Requirements for Federal Awards and (2) 45 CFR 75, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Department of Health and Human Services Awards.

2. Purpose and Use of the Information Collection

OGM will use this data to determine if grantees are proceeding in a satisfactory manner in meeting the approved goals and objectives of the project, and if funding should be continued for another budget period.

3. Use of Improved Information Technology and Burden Reduction

This form will be made available on the ACF Funding Opportunities web page under Forms. Grantees will be able to download the form, fill it out completely, and send it electronically to OGM, along with other necessary information. Electronic submission of this form will be required. Electronic submission will reduce burden and make the process more efficient by eliminating delays inherent in a paper-based manual process.

4. Efforts to Identify Duplication and Use of Similar Information

The proposed form provides specifics on the information needed in order for OGM to make an informed decision on continued funding for grantees. This request proposes a renewal of the form that has been in use by ACF since 2016 to collect grantee performance data. No other Federal agency collects the information required to evaluate these unique program criteria.

5. Impact on Small Businesses or Other Small Entities

The information requested is the minimum amount needed to comply with program requirements. It cannot be reduced for small entities.

6. Consequences of Collecting the Information Less Frequently

If this information is not collected, adequate data will not be available to evaluate current grantee projects and determine if funding should be continued 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 data for competitive projects would be inconsistent with Departmental policy and other authorities.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances that require collection of data to be conducted in any manner referenced in 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice was published on August 12, 2019, Volume 84, Number 155, page 39852, and provided a sixty-day period for public comment. We did not receive comments.

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.

10. Assurance of Confidentiality Provided to Respondents

Not applicable.

11. Justification for Sensitive Questions

Questions of a sensitive nature are not asked.

12. Estimates of Annualized Burden Hours and Costs

The ACF estimates 6,000 grantees will submit the proposed form annually. On average the burden hours per response is 1 hour. Frequency is semi-annually for the budget period. Therefore, the total hourly burden annually is expected to be 12,000 hours.

Total annualized dollar cost based on hourly burden, based on \$70 per hour, is \$840,000 (\$70 X 12,000 hours). Respondents vary in occupation greatly, so we estimated this using the mean wage for Management Occupations within the Social Assistance industry (BLS Industry code: NAICS 624000 - Social Assistance), which

was \$35.24 in 2018. To account for fringe benefits and overhead cost, we multiplied the mean wage by two.

ANNUAL BURDEN ESTIMATES

Instrument	Number or Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Annual Burden Hours
ACF-OGM-PPR-B	6,000	2	1	12,000

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Not applicable.

14. Annualized Cost to the Federal Government

It is estimated that, on average, there are 2 hours of labor on the part of government employees to review grantee Program Indicator reports in order to make an informed decision for continued funding. The average annual number of respondents is 6,000 which equates to 12,000 hours of staff time. Based on an average of \$50 per hour (estimating an average for federal grants management staff at the GS-12 and GS-13 levels), in monetary terms this equates to \$600,000 annually.

15. Explanation for Program Changes or Adjustments

This is a request for an extension of a previously approved form with no program changes.

16. Plans for Tabulation and Publication and Project Time Schedule

Information in the Program Indicators report will not be published.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

There will be no exceptions to the practice of displaying the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.