SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.** Congress requires this new data collection for program monitoring for the State Health Insurance Assistance Program (SHIP) under the Bipartisan Budget Act of 2018, SEC. 50207 (b). (https://www.govinfo.gov/content/pkg/BILLS-115hr1892enr/html/BILLS-115hr1892enr.htm)

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

   The purpose of this data collection is to collect sub-award data from grantees, including agency name, address, and annual federal funds received. Collection allows the Administration for Community Living (ACL) and the Center for Innovation and Partnership (CIP) to communicate with Congress and the public on the SHIP network of agencies. This is a new data collection requiring State SHIP grantees to provide the amount of federal funds provided annually to each sub-contractor and sub-grantee that are delivering SHIP services. The data collected will be will be electronically posted on the ACL website to educate the network on who the SHIP state sub-recipients are and how much money they are receiving.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.**

   The data will be collected using a spreadsheet, which is commonly available technology for the SHIP grantees.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2 above.**

   All of the necessary data is not currently collected.

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

Not applicable, this IC does not affect small businesses or other small entities.

6. **Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

   The collection of the data is required by statute. If the data was not collected then the agency would not be able to report to Congress and the public on the full network of SHIP agencies.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   - **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

   Not applicable.

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

   A notice published in the *Federal Register* on July 19, 2020 in FR 85 No. 148 pages 46123-46124. There were no public comments received during the 60-day FRN comment period.

A 30-day notice published in the *Federal Register* on October 23, 2020 in FR 85 No. 206 pages 67548-67549.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

Not applicable.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Administration for Community Living makes no assurance of confidentiality.

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. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Not applicable.

12. **Provide estimates of the hour burden of the collection of information.**

The information below shows the estimated annualized burden hours and costs for grantees to enter their data. There are 54 unique respondents.

Burden hours based on the number of grantees (54 grantees for the current funding cycle) at an estimated average time of 1 hour per year submitted annually for a total of 54 hours.

Respondent/Data Collection Activity	Number of Respondents	Responses Per Respondent	Hours Per Response	Annual Burden Hours
	54	1	1	54
Total:	54	1	1	54

Estimated cost to respondent retrieved from the Bureau of Labor Statistics, for a Social and Community Service Managers at an hourly rate of $35.05 adding overhead and benefits at $70.01 an hour. With 54 annual, burden hours for a total cost of $3785.40

Estimated Cost to Respondents

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Social and Community Service Managers	54	$70.01	$3785.40

https://www.bls.gov/oes/current/naics4_551100.htm#13-0000

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Questions 12 and 14.)**

    Total Annualized Capital/Startup Cost: $0

    Total Annual Costs (O&M): $0

    Total Annualized Costs Requested: $0

    There are no annualized capital or startup costs.

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 (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Questions 12, 13, and 14 in a single table.**

    Calculations for the estimate of annualized cost to the Federal government retrieved from the 2020 OPM salary and wage table.

    Burden hours for one staff spent reviewing and analyzing the program data estimated to be 10 hours annually at an average salary rate of a GS-13 $55.75 per hour for a total of $557.50. Accounting for 100% benefits and overhead the annual cost to the Federal government totals $1,115.

    https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx

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

    This a new information collection, there is a program change increase of 54 annual burden hours.

16. **For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used**.

The spreadsheets will be aggregated and displayed on the ACL website as required by legislation.

17. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The reports will be due May 31 annually starting in 2021. The data is available on the ACL website by end of the calendar year annually.

18. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable.