

Appraisal Subcommittee of the Federal Financial Institutions Examination Council
Supporting Statement A
ICR – Standardized Instructions and Format to be Used
For Interim and Final Progress Report

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary

The Appraisal Subcommittee (ASC) is authorized under Title XI of the Financial Institutions Reform, Recovery and Enforcement Act (Title XI) to award grants to States, the Appraisal Foundation and non-profit and for-profit organizations. These grants provide State appraiser regulatory agencies support for training, oversight and management of the appraisal community in their States. The ASC must collect progress report information to meet its responsibilities under 2 CFR 200.300 to “ensure that Federal funding is expended, and associated programs are implemented, in full accordance with U.S. statutory and public policy requirements....”

2. Use and sharing of collected information

Data from these progress report forms will be used for grant monitoring, feedback to grantees, technical assistance and long-term planning.

The ASC has developed the progress report to collect qualitative data on program activities such as staffing, training, communication and other activities conducted under the grant. These reports also collect qualitative data on the status of grantee progress, problems encountered, best practices and the grantees’ assessments on how they used funds effectively.

3. Use of information technology in information collection

The Report will be collected in conjunction with the Federal Financial Report (SF 425) through the on-line Payment Management System operated by the U.S. Department of Health and Human Services.

4. Efforts to identify duplication

The ASC grantees are not required to provide this report to any other entity or in any other report or process of the ASC.

5. Impacts on small businesses

This information collection does not impact small businesses or other small entities. The ASC has made efforts to limit the information requested and burden on all participants. The information sought is limited to information necessary to monitor ASC grantee federally grant-funded activities.

6. Consequences to the Federal program if the collection were conducted less frequently

If the ASC does not collect this information, it will be unable to perform oversight of its grants program in a suitable manner.

7. Special circumstances necessitating collection inconsistent with OMB guidelines

There are no special circumstances applicable to this information collection.

8. Efforts to consult with persons outside the agency

As required by 5 CFR 1320.8(d), a Notice soliciting public comments was published in the *Federal Register* on November 20, 2020, at 85 FR 74342. No comments were received.

9. Payments or gifts to respondents

No payments or gifts of any kind are provided to respondents.

10. Any assurance of confidentiality

The ASC is intending to collect financial reporting on a semiannual basis. Providing the information will be mandatory. Public Law 93-573 (Privacy Act of 1974) requires that respondents be informed of the purpose and uses to be made of the information collected. The information will be used to oversee grant progress.

11. Justification for questions of a sensitive nature

There are no questions of a sensitive nature. No personally identifiable information is collected.

12. Estimates of hour burden to respondents

The estimated response burden is based on the similarly structured progress reports administered by other federal agencies. Using the fillable form, we estimate that the average burden for the complete report is 1 hour.

The table below summarizes the burden estimate for this ICR.

Grant	Instrument	Total number of respondents	Total number of responses per year	Average burden hours per response	Annual burden hours
State Support Grants	Progress Report	54	2	1	108
Technical Assistance Grants	Progress Report	1	2	1	2
TOTAL					110

The estimated annual cost of this burden to grantees is: \$5,823.

The cost is based on an hourly rate of \$52.94 which is the sum of \$32.74 for the hourly wage and \$20.20 for benefits. The hourly rate of \$32.74 is 61.8 percent of total compensation and total benefits is 38.2 percent according to U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation, December 2020, Table 3, State and local government workers in the Management, professional and related occupation group: <https://www.bls.gov/news.release/ecec.t03.htm>.

The cost is estimated by multiplying \$52.94 x 110 for a total of \$5,823.40.

13. Estimates of other total annual cost burden to respondents or record keepers

There are no capital or start-up costs associated with this information collection.

14. Estimates of annualized cost to the Federal Government

The estimated annual cost to the Federal Government is \$18,609.

The cost covers the time for ASC personnel to review each report for data quality and compliance, provide technical assistance to complete the report, clarification on submissions as needed, and revision review as applicable. This is based on one GS-13 level and one GS-15 salaried employee. The average wage rate for a mid-level salaried GS-13 employee in an unspecified pay locality area as of January 1, 2021, is \$104,429 (GS-13, step 5). This represents 68.6 percent of total compensation according to U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation, December 2020, Table 1, percentage of wages and salaries for all civilian, management, professional and related employees: <https://www.bls.gov/nsc>. Adding an additional 31.4 percent for total benefits brings average annual compensation for a mid-level salaried GS-13 employee to

\$137,220 or \$65.98 per hour. For the GS-15 employee, the average wage rate is \$163,345 (GS-15/5) in the Washington, DC metropolitan areas (as of January 1, 2021). This represents 68.6 percent of total compensation and 31.4 percent for total benefits for a total of \$214,635 or \$103.19 per hour.

Assuming that each employee will spend one hour each reviewing 110 reports annually, the GS-13 employee would cost \$7,257.80 (65.98 x 110) and the GS-15 employee would cost \$11,350.90 (103.19 x 110). The total cost would be \$18,608.70.

15. Program changes or adjustments

This is a new information collection and there are no changes or adjustments to report.

16. Plans for tabulation and publication

The ASC does not plan to publish the reports but will use results as needed to inform the work of State appraiser regulatory agencies and share best practices.

17. Display of expiration date

No such approval is being sought.

18. Collection of information employing statistical methods

This collection does not employ statistical methods.