

**SUPPORTING STATEMENT FOR THE  
INFORMATION COLLECTION REQUIREMENTS OF THE  
IAF GRANTEE CONFLICTS OF INTEREST DISCLOSURE FORM**

The purpose of this Information Collection (ICR) request is required to ensure that the Inter-American Foundation (IAF or the Agency) can effectively identify, evaluate, and take appropriate action concerning IAF grantee conflicts of interest. Using the Grantee Conflicts of Interest Disclosure Form (or “Disclosure Form”), IAF grantees must disclose any actual or perceived personal or organization conflicts of interest or potential conflicts of interest. Also, IAF grantees must have written conflict of interest policies in place within the first six (6) months of their grant periods to (1) ensure all employees, board members, officers, or agents engaged in the award and administration of IAF grants, (2) avoid personal and organizational conflicts of interest, and (3) to prevent the use of positions for one’s own personal gain or the gain of persons or organizations with which one is associated personally.

**A. JUSTIFICATION**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

*The OMB Circular at 2 C.F.R. part 200 (“Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” or “OMB Super Circular”) requires Federal awarding agencies to establish conflicts of interest policies for Federal awards. According to 2 C.F.R. 200.112, non-Federal entities receiving federal awards must disclose in writing any potential conflict of interest to the Federal awarding agency.*

*Also, the IAF Terms and Conditions to each Grant Agreement requires grantees to disclose any actual or potential conflicts.*

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 IAF’s information collection is required to fulfill the requirements of the OMB Super Circular, protect the government’s interests at grant award, and ensure this protection extends throughout the performance of the grant period. The Disclosure Form is solely used by IAF grantees who have conflicts of interest to disclose. The IAF’s Office of the General Counsel*

*(OGC) will use this information to evaluate actual and/or perceived conflicts and to determine the appropriate action necessary to avoid, sufficiently mitigate, or neutralize the disclosed conflict.*

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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

*The Disclosure Form is sent to the grantee electronically as part of their Grant Agreement. The grantee has the option of submitting the form to the agency electronically via email or through regular mail.*

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 Item 2 above.

*Almost all information requested from IAF grantees under this ICR is personal in nature or business confidential and, in most cases, is not available from other sources.*

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

*Clear design of the Disclosure Form and clearly-written instructions reduce the time respondents need to complete the form. Also, because IAF grantees are mostly international organizations, the Grant Agreement which includes the Disclosure Form has been translated into the grantee's respective languages (Spanish, Portuguese, French, or Haitian Creole) for their convenience.*

6. Describe the consequence 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.

*If the IAF did not collect the information required on the Disclosure Form, obtained it less frequently, or only obtained it from some IAF grantees but not others, the Agency would be harmed because the IAF (through its OGC) could not adequately assess and address an IAF grantee's ability to use federal funds in a manner free from any actual and/or perceived conflicts of interest, which in turn, could compromise the nature of the grant..*

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 that 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 which 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.

*It is unlikely that the IAF would cause an ICR to be conducted in such manners as prescribed. If a potential conflict of interest (actual or perceived) is identified, the IAF may ask a grantee to provide OGC with additional information such as a copy of its bylaws and/or any law applicable law or regulation of its jurisdiction, in order to accurately assess (1) whether a conflict of interest is present and (2) determined how best to avoid, sufficiently mitigate or neutralize the conflict.*

8. If applicable, provide a copy and 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 prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

*Pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), the IAF published a notice in the Federal Register on May 7, 2021 (86 FR 24655, Document Number 2021-09619),*

*soliciting comments from the public and other interested parties on the ICR requirements contained in the Grantee Conflicts of Interest Disclosure Form. The notice is part of a preclearance consultation program that provides interested parties with an opportunity to comment on the IAF's request for an PRA approval by the Office of Management and Budget (OMB). The Agency did not receive any public comments regarding this information collection requirement.*

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

*The IAF would not be providing any payment or gift to respondents.*

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

*Assurance of confidentiality is provided under the terms of the Privacy Act of 1974. IAF's OGC reviews the Disclosure Form.*

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. This 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.

*There are no questions of a sensitive nature on the Disclosure Form.*

12. Provide estimates of the hour burden of the collection of information. The statement should: Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Provide estimates of annualized cost to respondents for the hour burdens for collections

of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

<i>Type of Respondent</i>	<i>Number of Respondents per year</i>	<i>Average # of burden hours per form</i>	<i>Total Hours</i>	<i>Average Hourly Wage</i>	<b>TOTALS</b>
<i>IAF Grantee</i>	<i>10</i>	<i>1.5</i>	<i>15</i>	<i>\$15.62</i>	<i>\$234.30</i>

*IAF staff were consulted as to the time respondents spent on this ICR. The average time respondents spent filling out the form was 30 minutes, and the remainder of the time was spent responding to follow-up questions via phone and email. The average hourly wage of \$15.62 was based on the grantees’ budgets submitted to the IAF as part of the Grant Agreement package using the average salary for a project director at \$43,000 and the average salary for an administrative assistant at \$22,000.*

*Follow-up questions from the IAF may include, but are not limited to, any of the following:*

- *What is your current organizational structure?*
- *Please describe the positions with a conflict. Salaried or contracted? Supervised by whom? Supervises who? How much of the salary/contract will be paid for using IAF funds? Who determines the salaries for those positions with a conflict?*
- *Please provide a copy of your by-laws.*
- *Is the current situation legal based on your country's laws?*
- *Do you agree to update the IAF Foundation Representative and the Office of the General Counsel as necessary over the course of the grant period?*
- *Do you agree to mitigate the conflict per IAF recommendations?*

13. Provide an estimate for 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 already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as

purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

*There are no additional costs to the respondents or recordkeepers resulting from this information collection.*

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

<i>Grantee Conflict of Interest Disclosure Form Review</i>	<i>Estimated # of forms presented to OGC each year</i>	<i>Average # of review hours per form</i>	<i>Total Hours</i>	<i>Average Hourly Wage</i>	<b>TOTALS</b>
<b>TOTALS</b>	10	3	30	\$60.00	\$1,800

*In the chart above, the estimated number of hours for staff review of the form is based on staff experience with similar tasks in the past. The Average Hourly Wage is based on the following. The review of each form is projected to average 3 hours each, with this time split as follows: Foundation Representative at 1 hour; Associate General Counsel at 1.5 hours; and General Counsel at .5 hour. We averaged the pay of a GS-15 General Counsel, a GS-13 Associate General Counsel, and a GS-13 Foundation Representative to come up with an average hourly rate of \$60.00. We then multiplied this average hourly rate to the total number of hours spent*

*reviewing disclosure forms per year (9 hours) and determined the annual costs to the Agency to be \$1,800.00*

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

*This is a new ICR and figures are new and do not reflect adjustments to previously reported information.*

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. 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 IAF will not publish any personally identifiable information collected on the Disclosure Form.*

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

*The IAF will display the expiration date for OMB approval in the Grantee Conflicts of Interest Disclosure Form.*

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

*The IAF is not seeking an exception to the certification statement.*

## **B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.**

*This supporting statement does not contain any collection of information requirements that employ statistical methods.*