

SUPPORTING STATEMENT - PART A

OLDCC Economic Adjustment Data System – 0704-EADS

1. Need for the Information Collection

The Office of Local Defense Community Cooperation (OLDCC), in coordination with the other Federal Agencies, delivers a program of technical and financial assistance to enable states and communities to:

- Plan and carry out civilian responses to workforce, business, and community needs arising from Defense actions;
- Cooperate with their military installations and leverage public and private capabilities to deliver public infrastructure and services to enhance the military mission, achieve facility and infrastructure savings as well as reduced operating costs; and,
- Increase military, civilian, and industrial readiness and resiliency, and support military families

Title 10, United States Code, Section 2391, *Military Base Reuse Studies and Community Planning Assistance*, authorizes the Secretary of Defense to, make grants, conclude cooperative agreements, and supplement funds available under Federal programs administered by agencies other than the Department of Defense, in order to assist State and local governments in planning community adjustments and economic diversification required (A) by the proposed or actual establishment, realignment, or closure of a military installation, (B) by the cancellation or termination of a Department of Defense contract or the failure to proceed with an approved major weapon system program, (C) by a publicly announced planned major reduction in Department of Defense spending that would directly and adversely affect a community, (D) by the encroachment of a civilian community on a military installation, (E) by threats to military installation resiliency, or (F) by the closure or the significantly reduced operations of a defense facility as the result of the merger, acquisition, or consolidation of the defense contractor operating the defense facility, if the Secretary determines that an action described in clause (A), (B), (C), or (F) is likely to have a direct and significantly adverse consequence on the affected community or, in the case of an action described in clause (D) or (E), if the Secretary determines that either the encroachment of the civilian community or threats to military installation resiliency is likely to impair the continued operational utility of the military installation.

2. Use of the Information

Respondents will be States, United States Territories, counties, municipalities, other political subdivisions of a state, special purpose units of a state or local government, other instrumentalities of a state or local government, and tribal nations supporting a military installation or the defense industrial base.

Respondents will be submitting information requesting OLDCC assistance for one of the following core programs of assistance:

- Military Installation Sustainability

- Industry Resilience
- BRAC & Downsizing
- Community Investment

This submission for EADS will also cover the following OLDCC programs with regard to grant application and grant performance reporting. These programs will have their own OMB Control Numbers to cover their unique information collection requirements.

- Public Schools on Military Installations (0790-0006 expired 2015, in process of reinstatement)
- Defense Community Infrastructure Program (0704-0607)
- Defense Manufacturing Support Communities Program (0704-0606)
- Community Noise Mitigation (OMB pending)

The first step in the grant application process is the OLDCC Project Manager validation of requirements and the OLDCC Director determination and finding that OLDCC assistance is authorized. The first collection instrument for the core programs of assistance will be submission of a grant application package. Respondents will receive a system-generated e-mail from OLDCC with a link to the web-based Economic Adjustment Data System (EADS) that will allow them to create a log-in and initiate the grant application process. The EADS system consists of a series of Tabs which lead respondents through the grant application process.

- Tab 1 is the SF-424, Application for Federal Assistance consisting of 15 blocks of information and the ability to upload (electronically) all supporting information specified by OLDCC.
- Tab 2 is the Application Narrative. Respondents input information to describe the proposed project and justify the need for financial assistance. The Application Narrative includes the following sections: Application Abstract; Introduction/Background; Need for Assistance; Project Goals and Objectives Related to OLDCC Mission; Results or Benefits Expected; Approach & Timeline; and Deliverables/Products. Each section is limited to 1,000 words. Supporting information such as Appendices, charts, maps and other illustrative materials may be uploaded to further describe the proposal.
- Tab 3 is the Budget Narrative. Respondents input grant budget information based upon the following object class categories: (1) Salary and Fringe; (2) Travel; (3) Equipment; (4) Supplies; (5) Other Costs; (6) Contractual; (7) Indirect Costs. Respondents also have capability provide a brief explanation of costs and methodology in a text box for each object class category. Respondents will also complete the SF-424A, Budget Information for Non-Construction Programs, or the SF-424C, Budget Information for Construction Programs.
- Tab 4 is the Assurances and Certifications Tab. Respondents will complete the SF-4244B, Assurances for Non-Construction Programs, or the SF-424D, Assurances for Construction Programs, as appropriate. Respondents will also complete the SF-LLL, Disclosure of Lobbying Activities.

Once the application has been submitted, the assigned OLDCC Project Manager will review and consult with the respondent to address any questions or issues with the grant application package. Depending upon the specific issue or concern, this engagement will be either by telephone, e-mail, or both. Once the application has been reviewed by the OLDCC Program Director and OLDCC Grants Management Specialist, the Project Manager briefs the OLDCC Technical Review Committee chaired by the OLDCC Director (Grants Officer) for approval. The Technical Review Committee consists of OLDCC Staff such as Deputy Directors, Program Directors, Project Managers and Grants Management Specialists. Any Technical Review Committee-directed changes needed to the application package will be transmitted electronically inside EADS to the respondent. Once the respondent completes those changes, they will sign the application electronically and return to OLDCC via EADS. The Project Manager will review to confirm all changes have been made and will then process the Notice of Award electronically inside EADS for Director (Grants Officer) signature. Once the OLDCC Director signs as the Grants Officer, the grant is considered awarded.

Once the grant is awarded, respondents will be required to provide information by three collection instruments. The first collection instrument is recurring Performance Reports submitted via EADS. Grant awardees are required to submit performance reports quarterly or semi-annually in addition to a final report at the close of the grant. The second collection instrument is the SF-425, Federal Financial Report annually via EADS. The third collection instrument is the submission of electronic payment requests (at their discretion) through the U.S. Department of Health and Human Services' Payment Management System. This action consists of loading 11 data elements into the web-based system. This action is not considered an information collection under the PRA. Additionally, DoD FMR requires respondents to submit to OLDCC either SF-270, Request for Advance or Reimbursement, or SF-271, Outlay Report and Request for Reimbursement for Construction Programs. Respondents complete the electronic pdf form and submits to OLDCC via e-mail.

DoD will submit Requests for Common Form (RCFs) to account for the use of the following forms that were mentioned above:

- SF-424 – OMB Control Number 4040-0004
- SF-424A – OMB Control Number 4040-0006
- SF-424B – OMB Control Number 4040-0007
- SF-424C – OMB Control Number 4040-0008
- SF-424D – OMB Control Number 4040-0009
- SF-LLL – OMB Control Number 4040-0013
- SF-425 – OMB Control Number 4040-0014

3. Use of Information Technology

100% of responses (grant applications and performance reports) will be submitted electronically via Economic Adjustment Data System (EADS).

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

The collection of grant applications for OLDCC programs is driven by annual Congressional appropriations processes. Performance reports must be collected quarterly or semi-annually at the discretion of OLDCC to track the progress of grant projects.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

This information collection is being processed on an emergency basis. An emergency 15-Day Federal Register Notice (FRN) for the collection published on Friday, November 26, 2021. The 15-Day FRN citation is 86 FR 67452.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

BRAC records are handled in accordance to the OSD General Record Schedule (GRS) under file number 1208-01 "Economic Impact Minimize Files." This file number includes studies, reports, correspondence, and evaluations of the economic impact of proposed or suggested

base closures or reduction programs, which are the subject of Congressional or widespread public interest. The current disposition instructions are as follows:

Permanent. Cut off annually and transfer to the National Archives and Records Administration (NARA) 25 years after cutoff.

At this time OLDCC is working on a submission to update the organization's assigned records category (1208) within the OSD GRS. As part of this update, we are proposing the disposition associated with the 1208-01 file number be updated to the following :

- (a) Funded projects and supporting documents are permanent. Cut off after the closeout of the project and the end of federal interest. Retire to NARA after 30 years.
- (b) Non-funded project documents are temporary. Cut off after the project is no longer being considered for funding. Destroy after 25 years.

The current disposition instructions that cover BRAC records will remain in effect until NARA approves the suggested updates. Whether the update is approved or disapproved, these records will keep the designation of permanent records and will be handled as such.

At this time, there are no file numbers within the OSD General Records Schedule (GRS) or the National Archives and Records Administration (NARA) GRS that account for records through the execution of the Industry Resilience or Community Investment Programs of Assistance. OLDCC is working on a submission to update the organization's assigned records category (1208) within the OSD GRS. We are proposing that these documents have the following retention schedule:

- (a) Funded projects and supporting documents are permanent. Cut off after the closeout of the project. Retire to NARA after 25 years.
- (b) Non-funded project documents are temporary. Cut off after the project is no longer being considered for funding. Destroy after 20 years.

Until the approval or disapproval of the for mentioned submission, Military Installation Sustainability, Industry Resilience or Community Investment program execution records will be treated as 'Unscheduled' as defined in 36 CFR 1220.18. This means the records will be handled as permanent records until the final disposition is approved by NARA.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instruments
EADS Grant Application

- a) Number of Respondents: 62

- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 62
- d) Response Time: 7 hours
- e) Respondent Burden Hours: 434 hours

EADS Performance Reporting

- a) Number of Respondents: 62
- b) Number of Responses Per Respondent: 5
- c) Number of Total Annual Responses: 310
- d) Response Time: 2 hours
- e) Respondent Burden Hours: 620 hours

2) Total Submission Burden

- a) Total Number of Respondents: 62
- b) Total Number of Annual Responses: 372
- c) Total Respondent Burden Hours: 1,054 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

EADS Grant Application

- a) Number of Total Annual Responses: 62
- b) Response Time: 7 hours
- c) Respondent Hourly Wage: \$46.91
- d) Labor Burden per Response: \$328.37
- e) Total Labor Burden: \$20,358.94

EADS Performance Reporting

- a) Number of Total Annual Responses: 310
- b) Response Time: 2 hours
- c) Respondent Hourly Wage: \$46.91
- d) Labor Burden per Response: \$93.82
- e) Total Labor Burden: \$29,084.20

2) Overall Labor Burden

- a) Total Number of Annual Responses: 372
- b) Total Labor Burden: \$49,443.14

The Respondent hourly wage was determined by using the Department of Labor Wage Website (https://www.bls.gov/oes/current/oes_nat.htm): 17-0000 Architecture and Engineer Occupations, and 13-1111 Management Analysts

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instruments

EADS Grant Application

- a) Number of Total Annual Responses: 62
- b) Processing Time per Response: 12 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$60.87 (GS-14/6)
- d) Cost to Process Each Response: \$730.44
- e) Total Cost to Process Responses: \$45,287.28

EADS Performance Reporting

- a) Number of Total Annual Responses: 310
- b) Processing Time per Response: 1 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$60.87 (GS-14/6)
- d) Cost to Process Each Response: \$60.87
- e) Total Cost to Process Responses: \$18,869.70

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 372
- b) Total Labor Burden: \$64,156.98

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$0
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$250,000
- f) Other: \$500,000 (contract support)

2) Total Operational and Maintenance Cost: \$750,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$64,156.98

2) Total Operational and Maintenance Costs: \$750,000

3) Total Cost to the Federal Government: \$814,156.98

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.