

DOL Generic Solution for Funding Opportunity Announcements
OMB Control Number 1225-0086
Expiration Date: July 31, 2022

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS
U.S. DEPARTMENT OF LABOR GENERIC SOLUTION FOR FUNDING
OPPORTUNITY ANNOUNCEMENTS
CONTROL NUMBER 1225-0086**

Part A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Describe the practical utility of the collection, including proposed and actual use. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Periodically the Department of Labor (DOL or the Department) solicits applications for grants through issuing a “Funding Opportunity Announcement” (FOA). To ensure grants are awarded to the applicant(s) best suited to perform the functions of the grant, applicants are generally required to submit a two-part application. The first part of DOL’s grant applications consists of submitting the Standard Form 424 (SF-424), “Application for Federal Assistance,” for which approval is obtained under Control Number 4040-0004. The second part of a grant application usually requires a technical proposal demonstrating the applicant’s capabilities in accordance with a statement of work and/or selection criteria.

Under OMB Circular A-102, Section C, heads of Executive departments are instructed to obtain Office of Management and Budget (OMB) approval under the Paperwork Reduction Act (codified at 44 U.S.C. § 3501, et seq., with regulations at 5 C.F.R. Part 1320) before collecting information associated with grants that is “different or additional” to the information collected on approved standard forms (e.g., SF-424, etc.). Further, OMB Circular A-110, Subpart B instructs Federal agencies to comply with the requirements of 5 C.F.R. Part 1320, “Controlling Paperwork Burdens on the Public,” with regard to all forms used by the Federal awarding agency in place of or as a supplement to the SF-424 series.

The DOL is requesting approval to continue a generic FOA ICR for information collection requirements extending beyond what is collected on currently approved standard forms. OMB approval of this generic ICR assists the DOL to carry out its responsibilities under the Paperwork Reduction Act by accurately accounting for the public burden associated with grant applications through promoting a common structure for reporting the information collection requirements contained in DOL’s FOAs.

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- 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 information collected in response to solicitations for grant applications has been and will be used by the Department of Labor for issuing grants to the applicants most suited for fulfilling the mission of the grant.

- 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 burdens.**

The DOL receives grant applications via the government-wide e-grants initiative (“Grants.gov”) located on the Internet at <http://www.grants.gov>.

- 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.**

The information collected in DOL FOAs and in the associated reporting requirements is unique to each grant; therefore, it is not duplicated in any other source. As applicable, the Department utilizes currently approved standard forms and will not duplicate information collected on these forms.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. Describe how the collection reduces, to the extent practicable and appropriate, the burden on all persons, including small entities, providing information.**

This information collection request does not have a significant economic impact on a substantial number of small entities. To limit the burden imposed on respondents, the Department requires the minimum information needed to award grants.

- 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 the burden.**

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DOL activities regarding grants would be significantly hindered if it were not able to collect the information required to evaluate potential grant recipients.

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 secret, 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.**

The Department will ensure that all collections of information contained in its FOAs comply with 5 C.F.R. § 1320.5.

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 C.F.R. § 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

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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.**

The DOL published a 60-day notice requesting comments on January 20, 2022 (87 FR 3126). The Department received 1 comment.

The Department received a comment from a grant writer for the Iowa Workforce Development, State of Iowa, indicating that the Department is underestimating the number of hours it takes to complete a grant application in response to a FOA. The commenter estimates the time in aggregate man-hours to research, work across SME's, write, edit, and submit at 140+ hours; even many of the smaller, less complex FOA responses still require 50-70 hours.

The Department has considered the comment and has increased the hour burden for each grant application to 50 hours. The burden is broken out as follows:

- 1) Reviewing and executing FOA instructions (i.e., Administrative and Eligibility requirements) – 5 hours
- 2) Collecting and reporting performance data (i.e., WIOA Indicators/TEGL 23-19) – 10 hours
- 3) Researching existing data sources (i.e., Labor Market/U.S. Census Bureau data) – 15 hours
- 4) Gathering and maintaining needed data (i.e., Past Performance/Project metrics) – 15 hours
- 5) Gathering and completing required documentation (i.e., FSRA/MOUs/LOCs). – 5 hours

The DOL associates no other burden costs with this information collection. With all submissions through Grants.gov, the burden costs associated with postage/mailing do not apply. The burden

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costs associated with staff time and associated benefits highlighted in the comment fall under the “Monetized Value of the Time Burden” which is accounted for in Question 12 below.

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

The Department does not provide any payment or gift to respondents in connection with this ICR.

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

The Department makes no assurance of confidentiality to those responding to FOAs; however, as a practical matter disclosures are only made in compliance with the Freedom of Information Act (FOIA) and DOL regulations implementing that statute.

The OMB has issued a waiver to DOL from Uniform Grant Guidance and Regulations so that the DOL could apply open government principles to the grant award process. This waiver allows DOL to require grant applicants to agree to allow DOL to publish on a public Web site abstracts of grant applications and the contents of all grant applications selected for award, with any proprietary, confidential commercial/business, and personally identifiable information redacted before publication. The specific grant application contents that posted may vary between solicitations, e.g., the narrative summary or technical proposal. In order to ensure that confidential information is properly protected from disclosure when the DOL posts winning technical proposals, applicants whose technical proposals will be posted will be asked to submit a second redacted version of their technical proposal, with proprietary, confidential commercial/business, and personally identifiable information redacted. All non-public information about the applicant’s staff should be removed as well. These provisions comport with FOIA requirements.

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.

Application and reporting requirements in FOAs do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

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- **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 in Item 13.**

Based on historical experience, the DOL projects an average of 20 FOAs per fiscal year. Additionally, the Department projects that it will receive approximately 6,000 FOA applications over a three-year period. Since the burden for a Generic ICR cannot exceed the amount requested for the 3-year approval, to ensure that the Department has sufficient burden in the “bucket”, the Department is basing its estimates on a total of 7,500 responses.

After considering the comment received (see the discussion in Q8 above) the Department assumes it takes an average of 50 working hours to prepare and submit an application in response to a FOA. For purposes of this information collection request, the DOL has used the average hourly earnings of a person in business and professional services (\$38.51 per hour¹) to monetize the value of respondent time. For monetization purposes, the DOL has increased this rate by 40 percent, to account for fringe benefits. The total hourly rate is \$53.91. $\$38.51 * 140\% = \53.91 . Therefore, the burden for these reporting activities is as follows using average response times:

$$7,500 \text{ responses} * 50 \text{ hours} = 375,000 \text{ hours.}$$

$$375,000 \text{ hours} * \$53.91 = \$20,216,250$$

Activity	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
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1 See [The Employment Situation—April 2022](#) at pg. 34, DOL, Bureau of Labor Statistics (May 6, 2022).

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Grant Application Preparation	7,500	50 hours	375,000	\$53.91	\$20,216,250
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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **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 collection 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 costs other than monetization of hourly burden as captured above in Item 12.

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

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information. Agencies also may aggregate cost estimates from Items 17, 18, and 19 in a single table.

The Department incurs no unique start-up or operational and maintenance costs as a result of the collections of information contained in its FOAs.

15. Explain the reasons for any program changes or adjustments reporting in Items 12 or 13.

This ICR reflects an increased burden estimate of 1,500 responses (from 6,000 to 7,500) and 225,000 hours (from 150,000 to 375,000) based on an increase in the estimated time it takes a respondent to complete a grant application (50 hours).

16. For collections of information in which 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 Department has no plans to publish the information collected in associated with FOAs; however, winning technical proposals are posted on the Internet.

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.

DOL will include the OMB control number and expiration date on all FOAs.

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

The Department is not seeking an exception to the certification statement.

Part B. Statistical Methods

This information collection does not employ statistical methods.