

## SUPPORTING STATEMENT - PART A

OLDCC Economic Adjustment Data System – 0704-0625

### 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
- 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:

- Industry Resiliency (Diversification and Industry Transition)

- Base Realignment and Closure & Downsizing (Realignment)
- Community Investment

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.

- a) 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.
- b) 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.
- c) 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 the capability to 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."
- d) Tab 4 is the Assurances and Certifications Tab. Respondents will complete the SF-LLL, "Disclosure of Lobbying Activities" if required.

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 Activity Lead (formerly Program Director) and OLDCC Grants Management Specialist, the Project Manager briefs the OLDCC Technical Review Committee chaired by the OLDCC Director (also the OLDCC Grants Officer) for approval. The Technical Review Committee consists of OLDCC staff such as Deputy Directors, Program Activity Leads, Project Managers, and Grants Management Specialists. Any Technical Review Committee-directed changes needed for 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," required annually via EADS. The third collection instrument is the submission of electronic payment requests (at the Grantee's 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 Paperwork Reduction Act. Additionally, DoD Financial Management Regulation 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 submit to OLDCC via e-mail.

3. Use of Information Technology

100% of responses (grant applications and performance reports) will be submitted electronically via the OLDCC 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 in accordance with 2 CFR Part 200 regulations as part of grantor monitoring requirements.

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

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, April 12, 2022. The 60-Day FRN citation is 87 FR 8004.

One comment was received during the 60-Day Comment Period. It is included below along with our Agency's response to the comment.

Comment: This proposal creates an undue paperwork burden on entities that entails expending manhours that could be used elsewhere. The information collected is negligible and not utilitarian, while also creating a burden on DOD manpower.

Response: Information collected in the Economic Adjustment Data System supports multiple grant programs and Assistance Listings for over 60 grant awards per year. The information collected from applicants and grantees is limited to what is required to execute appropriated grant funds and oversee federal grants management in compliance with applicable federal grant regulations.

A 30-Day Federal Register Notice (FRN) for the collection published on Tuesday, July 26, 2022. The 30-Day FRN citation is 87 FR 44366.

#### 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.

Records will be handled per the 1208 records category and its associated file numbers found within the Office of the Secretary of Defense Records Disposition Scheduled (last updated in April 2021). Any records collected that are not currently covered under these authorities will be treated as "Unscheduled" as defined in 36 CFR 1220.18. This means these records will be handled as permanent records until the final disposition is approved by the National Archives and Records Administration.

##### 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](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

There has been no change in burden since the last approval.

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.