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Supporting Statement for Portfolio Analysis and Management System (PAMS) Information Collection Extension

# Part A: Justification

**OMB No. 1910-5178**

*Insert Collection Instruments*

*PAMS*

September 2022

U.S. Department of Energy

Washington, DC 20585

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## **Introduction**

**Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.**

This collection is based on the Health Resources and Services Administration (HRSA) Electronic Handbooks software. Discretionary financial assistance proposals continue to be collected using Grants.gov but are imported into PAMS for use by the program offices. Under the existing information collection, an external interface in PAMS allows two other types of proposal submission: DOE National Laboratories are able to submit proposals for technical work authorizations directly into PAMS, while other Federal Agencies will be able to submit Proposals for interagency awards directly into PAMS. External users from all institution types are able to submit Solicitation Letters of Intent and Pre-proposals directly into PAMS. All applicants, whether they submitted through Grants.gov or PAMS, are able to register with PAMS to view the proposals that were submitted. They also are able to maintain a minimal amount of information in their personal profile. The existing collection automates and streamlines the submission, tracking, and correspondence portions of financial award pre-review processes.

The information collected is used by DOE to select applicants and projects for financial awards. The DOE has submitted notice of its intent to continue use of this information collection using 60-Day notice to the Federal Register. The notice was published Tuesday, June 7, 2022, Volume 87, Number 109 and page 34677.

## **A.1. Legal Justification**

**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 information collection.**

Section 641 of the Department of Energy Organization Act, codified at 42 U.S.C. § 7251, authorizes the DOE to collect, use, and retain information that is mandatory for the financial awards process. Here, financial award refers to financial assistance awards, interagency contract awards, and DOE national laboratory contract work authorization research awards made by the DOE Office of Science (SC).

The SC mission is to deliver the scientific discoveries and major scientific tools that transform our understanding of nature and advance the energy, economic, and national security of the United States. The SC is the lead Federal agency supporting fundamental scientific research for energy and the nation’s largest Federal sponsor of basic research in the physical sciences. The SC supports about 25,000 investigators at about 300 U.S. academic institutions and at all 17 of the DOE national laboratories. Financial awards are provided in the program areas of Advanced Scientific Computing Research (ASCR); Biological and Environmental Research (BER); Basic Energy Sciences (BES), Fusion Energy Sciences (FES); High Energy Physics (HEP), Nuclear Physics (NP); and Workforce Development for Teachers and Scientists (WDTS).

The SC makes all funding decisions based on peer review of proposals submitted to the government by universities, non-profit organizations, large and small businesses, other Federal agencies, State and local governments, individuals, and DOE national laboratories seeking Federal financial support for research projects, training, and related activities. The information collected through PAMS will be used for future funding decisions. The SC executes peer review for at least 3,000 financial assistance and several hundred DOE national laboratory funding proposals each year. In some circumstances, letters of intent or pre-proposals are solicited prior to proposal submission to allow advance planning of the peer review and to help ensure the responsiveness of those proposals that are eventually submitted. While Grants.gov is used for collecting financial assistance proposals, a method is needed for collecting letters of intent, pre-proposals, and contract proposals (such as those for interagency or DOE national laboratory awards) which is the intended use of PAMS.

## **A.2. Needs and Uses of Data**

**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**

This information will be used by DOE to select applicants and projects for financial awards. The receipt, review, and disposition of letter of intent, pre-proposal, lab proposal, and interagency proposal submissions will be monitored by DOE federal employees and authorized contractors. DOE employees may also use the database to identify peer reviewers. A record from this system may be disclosed as a routine use to peer reviewers selected by the DOE SC for their expertise in specific research areas to evaluate the proposal in accordance with established evaluation criteria. A record also may be disclosed as a routine use to a principal investigator (PI), sponsored programs office, business office, or similar element for the purpose of checking the status of proposals that have been submitted to DOE for support.

The SC participates in and is coordinating with the STAR Metrics (Science and Technology for America's Reinvestment: Measuring the Effect of Research on Innovation, Competitiveness and Science) project and the Federal Researcher Profile (SciENCV) Workgroup. Having a modern information collection system facilitates this participation.

The PAMS information collection automates and streamlines the submission, tracking, and correspondence portions of financial award pre-review processes. Specifically, certain pre-award information is collected through PAMS. External users, once registered with PAMS, are able to submit letters of intent and pre-proposals in response to solicitations, interagency contract proposals and DOE national laboratory contract work authorization proposals. Financial assistance applications will continue to be submitted via Grants.gov, and then received by PAMS for processing as Grants.gov does not have the business logic for processing these proposals. All information in this collection comes from externally established user accounts and various submissions provided to the DOE by authorized external users (i.e., scientists and research administrators). PAMS automates routine correspondence, making submitted documents available to the submitters for tracking, and allows the DOE SC to automatically track submissions internally. By establishing user accounts, applicants enter contact information and institution information once, alleviating the need to retype it each time they have a submission. Submitting institutions also have access for tracking purposes in one central location to all documents submitted.

## **A.3. Use of Technology**

**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.**

The DOE SC leveraged Government Off-the-Shelf (GOTS) software capabilities to implement a consolidated system called Portfolio Analysis and Management System (PAMS), which is based on the Health Resources and Services Administration (HRSA) Electronic Handbooks software.

The DOE SC collects information from the population of respondents targeted by this information collection via pre-proposals, letters of intent, and proposals submitted to DOE (e.g., Grants.gov, email, fax, or Postal Service). All of the information is collected electronically.

## **A.4. Efforts to Identify Duplication**

**Describe efforts to identify duplication.**

Existing contact and institution information data, to the extent possible, was migrated into PAMS from retiring information systems. PAMS allows institutions and individuals outside DOE to establish and maintain their own profiles. Self-maintenance of profiles ensures information is current and accurate, allows users to enter information only once instead of at the time of each submission, and helps to minimize duplicate entries in the database. Requiring user registration prior to submission of documents allows the DOE SC to electronically link related submissions.

Since each funding opportunity requires unique letters of intent, pre-proposals, interagency proposals, and/or lab proposals that are responsive to the scientific aims of the solicitation, fresh submissions must be generated and entered for each solicitation. Discretionary financial assistance proposals continue to be collected using Grants.gov but are imported into PAMS for use by the program offices. The existing information collection has an external interface in PAMS to allow two other types of proposal submission: DOE national laboratories are able to submit proposals for technical work authorizations directly into PAMS, while other Federal Agencies are able to submit proposals for interagency awards directly into PAMS. External users from all institution types are currently able to submit letters of intent and pre-proposals directly into PAMS. All applicants, whether they submit proposals through Grants.gov or letters of intent, pre-proposals or laboratory proposals through PAMS, are able to register with PAMS to view the proposals that were submitted. They are also able to maintain a minimal amount of information in their user profile.

## **A.5. Provisions for Reducing Burden on Small Businesses**

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

The SC manages the Small Business Innovative Research/Small Business Technology Transfer Research (SBIR/STTR) program for the entire DOE. Small businesses will thus register with PAMS and use it to submit letters of intent or pre-proposals and to view proposals they have previously submitted into Grants.gov that have been imported into PAMS. Small businesses have a similar burden to any other business to provide submissions and responses however the electronic submission is a faster process than the amount of time to complete the same form by hand. Additionally, the electronic submission improves the quality of information collected which contributes to a more timely response to submissions.

## **A.6. Consequences of Less-Frequent Reporting**

**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.**

Without this information, the DOE SC will not be able to identify the best applicants and projects to select for financial awards. DOE federal employees will not be able to monitor the receipt, review, and disposition of proposal submissions. Without continuing to use the existing collection methods, the SC would not be able to achieve its mission. It would be unable to track the high volume of submissions.

Information collections about grant applications are entirely driven by the frequency with which applicants seek to propose their scientific concepts to the DOE SC for financial support. If applications were received with less frequency, there would be a corresponding reduction in the overall amount of cutting-edge scientific research being conducted and supported. Failing to collect information about grant applications would render the DOE SC incapable of meeting its statutory obligation (Department of Energy Office of Science Policy Act, Section 303) that “The Office of Science shall carry out an awards program to conduct fundamental and use-inspired energy research to accelerate scientific breakthroughs.”

## **A.7. Compliance with 5 CFR 1320.5**

**Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:**

**(a) requiring respondents to report information to the agency more often than quarterly;**

**(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

**(c) requiring respondents to submit more than an original and two copies of any document;**

**(d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**

**(e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;**

**(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;**

**(g) that includes a pledge of confidentially that is not supported by authority established in stature of 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**

**(h) 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.**

The data collection is conducted in a manner consistent with OMB guidelines, so there are no special circumstances.

## **A.8. Summary of Consultations Outside of the Agency**

**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 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE 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 report.**

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 7, 2022, Volume 87, Number 109, and page number 34677.  The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

The detailed records are shared by each SC subprogram or program every three years with a committee of visitors (COV), a subcommittee of a federal advisory committee comprised of external scientific experts charged by the SC Director to assess (1) the efficacy and quality of the processes used to solicit, review, recommend, monitor, and document funding actions, and (2) the quality of the resulting portfolio. The SC uses COV input as an impetus to continually change and improve its business processes and to evaluate progress at regular intervals. Almost every COV report issued since COVs began in 2002 has recommended improvements to the SC data management and tracking systems. All COV reports and the program responses to them are posted on the SC website in a public archive. (https://science.energy.gov/sc-2/committees-of-visitors /)

## **A.9. Payments or Gifts to Respondents**

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

No payment or gift to respondents is being proposed under this information collection.

## **A.10. Provisions for Protection of Information**

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

PAMS contains personal information protected under the provisions of the Privacy Act of 1974; Compilation of Privacy Act System of Records; Notice (Vol. 74 No. 6/ Friday, January 9, 2009). **DOE – 82 SYSTEM NAME:** Grant and Contract Records for Research Projects, Science Education, and Related Activities (pp. 1082-1083).

Reports about people, institutions, awards, and proposals can be produced for internal DOE use, e.g., evaluating and selecting applicants, determining funding for projects, and tracking awards and proposals. Only DOE employees and contractors who have a need to know based on their job responsibilities have access to these reports. Persons who are providing information in PAMS are subject to the same statutory criteria applicable to DOE employees under the Privacy Act and other laws.

## **A.11. Justification for Sensitive Questions**

**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 DOE 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.**

PAMS registrants will be asked to provide, on a voluntary basis, demographic data (gender, ethnicity, race, citizenship, disability, degree type and year). Collection will be made according to the OMB standards for data on race and ethnicity:

* Gender (Female, Male, Do Not Wish to Provide)
* Disability (select one or more) Hearing Impairment, Visual Impairment, Mobility/Orthopedic Impairment, Other (Enter Description), None, Do Not Wish to Provide
* Ethnicity (choose one) Hispanic or Latino, Not Hispanic or Latino, Do Not Wish to Provide
* Race (select one or more) American Indian or Alaskan Native, Asian, Black or African American, Native American or Pacific Islander, White, Do Not Wish to Provide
* Citizenship (choose one) U.S. Citizen, Permanent Resident, Other Non-U.S. Citizen, Do Not Wish to Provide
* Degree Type and Year

Committees of Visitors have frequently suggested that the SC collect demographic data to track the evolution of its portfolio. National Academies reports (e.g. National Research Council. Beyond Bias and Barriers: Fulfilling the Potential of Women in Academic Science and Engineering. Washington, DC: The National Academies Press, 2007) and numerous reports from workshops on gender, racial, and ethnic equities cosponsored by the DOE SC, the National Science Foundation, and the National Institutes of Health have articulated the need for such data.

The following explanation is provided to the community from whom the voluntary information is being collected: “Collection of demographic data allows the DOE SC to gauge whether its programs and opportunities are fairly reaching and benefiting everyone regardless of demographic category. Knowledge of the demographic distributions within a portfolio, particularly those collected over many years, allows assessments of trends and demonstrates responses to actions taken on the part of agencies, e.g., establishment of programs for early-career researchers or for underrepresented populations. To gather the information needed, we ask that system users provide the requested demographic information about themselves. Submission of the requested information is voluntary and is not a precondition of award.”

## **A.12A. Estimate of Respondent Burden Hours**

**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, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.**

The following numbers are calculated using the average of the number of submissions received in fiscal year 2018 through fiscal year 2021. The averages are rounded and presented as whole numbers.

There were 7,294 new PAMS registrants, who are to include 589 submitters of lab proposals/interagency proposals, 3,141 pre-proposals, 3,946 Letters of Intent (LOI) (assuming one person per estimated submission) and 20,395 reviewers of proposals submitted through Grants.gov.

Please note that a new registrant can submit more than one proposal and be selected to serve as a reviewer for multiple reviews.

**Annual Estimated Number of Total Responses:** The Office of Science receives about 589 DOE national laboratory and interagency proposals per year, based on a three-year average of submission numbers (fiscal year 2018 through fiscal year 2021), about 3,141 pre-proposals and 3,946 letters of intent per year, based on an average of the data collected between fiscal year 2018 and fiscal year 2021. There are also approximately 20,395 reviews conducted per year during the same fiscal year parameters.

**Annual Estimated Number of Burden Hours:** The time it takes to complete a form depends upon the type of form being completed. External users will need to register with PAMS in order to access the system. It takes approximately 20 minutes for external users to complete the forms required to become a registered PAMS user. Both LOI and pre-proposal forms take 15 minutes each, whereas completing a lab/interagency proposal will take about 2.5 hours. The reviewers require about 2 hours of analysis, per submission. Based on the annual estimated number of responses, broken down by DOE national laboratory, letter of intent and pre-proposal, the annual estimated time required for reviewers to complete analysis or responses and the time required for external users to register with PAMS, the estimated annual number of burden hours is 46,440.

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| **Table A1. Estimated Respondent Hour Burden** |  |
| **Form Number/Title (and/or other Collection Instrument name)** | **Number of Respondents** | **Annual Number of Responses** | **Burden Hours Per Response** | **Annual Burden Hours** | **Annual Reporting Frequency** |
| One-time Registration | 7,294 | 7,294 | .33 | 2,407 | 1 |
| Letter of Intent | 3,946 | 3,946 | .25 | 986 | 1 |
| Pre-Proposal | 3,141 | 3,141 | .25 | 785 | 1 |
| Lab/Interagency Proposal | 589 | 589 | 2.5 | 1,473 | 1 |
| Review | 20,395 | 20,395 | 2 | 40,790 | 1 |
| **TOTAL** | **35,365** | **35,365** |  | **46,441** |  |

## **A.12B. Estimate of Annual Cost to Respondent for Burden Hours**

**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’.**

The following numbers are calculated using the average labor costs by type of respondent using a random subset of data for 10 of each item collected in PAMS for the primary respondent. The labor rate is then multiplied by 1.4 to account for the cost of wage plus benefits. This number is then multiplied by the average annual burden hours.

|  |  |
| --- | --- |
| **Table A2. Estimated Respondent Cost Burden** |  |
| **Form Number/Title (and/or other Collection Instrument name)** | **Total Annual Burden Hours** | **Hourly Wage Rate** | **Total Respondent Costs** |
| One-time Registration | 2,407 | 126.46 \*1.4= 177.04 | 426,145 |
| Letter of Intent | 986 |  72.78 \* 1.4= 101.89 | 100,466 |
| Pre-Proposal | 785 |  72.78 \*1.4= 101.89 | 79,985 |
| Lab/Interagency Proposal | 1473 |  140.19\*1.4 = 196.27 | 289,002 |
| Review | 40,790 |  72.78\*1.4 = 101.89 | 4,156,175 |
| **TOTAL** | **46,441** |  | **5,051,773** |

## **A.13. Other Estimated Annual Cost to Respondents**

**Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

There are no other estimated annual costs to respondents.

## **A.14. Annual Cost to the Federal Government**

**Provide estimates of annualized cost to the Federal government.**

The PAMS Help desk supports the system users. The annual Help Desk costs $436,491. Note: there is an annual escalation included in the current contract. We estimate that 1/3 of the cost is related to the collection. The associated contract is fixed price, therefore, the annual cost of the associated operations and maintenance for the collection is $145,497.

It is difficult to quantify the associated equipment costs. The equipment used is a shared resource supporting more than 50 systems. When considering the relative percentage of the system the collection represents the percentage of cost associated is less than 1%.

The cost of federal support to maintain the collection is also nominal. There are several federal employees who are responsible for the day-to day support of the PAMS system. They include program and task monitoring employees. Using 1 full time equivalent (FTE) salary for a GS14/5 at $143,064, and benefits at $57,224 and the percentage of time required to maintain the collection as 5% annually the estimated federal program employee for FTE 1 cost is $10,014. Using 5 full time equivalent (FTE) salary for a GS15 /5 at $168,282 and benefits at $67,312.80 per Task Monitor FTE and the percentage of time required to maintain the collection as 2% annually the estimated federal employee for each Task Monitor FTE multiplied by the number of FTE (5) cost is $23,560.

The total estimated annualized cost to the federal government = $179,071.

## **A.15. Reasons for Changes in Burden**

**Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.**

Adjustments were made in the calculation to reflect the significant increase in number of responses as evidenced by the data collected in the most recent three-year fiscal period. The increase in the cost burden reflects a newly calculated cost per collection element by hourly rate of primary person that provides the information. The previous amount request was 0.

|  |
| --- |
| **Table A3. ICR Summary of Burden** |
|  | **Requested** | **Program Change Due to Agency Discretion** | **Change Due to Adjustment in Agency Estimate** | **Previously Approved** |
| Total Number of Responses | 35,365 |   | +14,765 |  20,600 |
| Total Time Burden (Hr) | 46,441 |   | +16,291 |  30,150 |
| Total Cost Burden | 5,051,773 |  | +5,051,773 | 0 |

## **A.16. Collection, Tabulation, and Publication Plans**

**For collections whose results will be published, outline the plans for tabulation and publication.**

The results of this collection will not be published.

## **A.17. OMB Number and Expiration Date**

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

The OMB Control Number and expiration date will be displayed on the collection instrument.

## **A.18. Certification Statement**

**Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

There are no exceptions to OMB Form 83-I.