Generic Clearance for Grant Program Monitoring Activities

Supporting Statement

1. Circumstances of Information Collection

The Substance Abuse and Mental Health Services Administration (SAMHSA) is requesting approval from the Office of Management and Budget (OMB) for a new generic information collection entitled Generic Clearance for Grant Program Monitoring Activities allows SAMHSA to collect standardized information from its grant recipients necessary to perform agency program oversight activities such as monitoring progress on recipient activities, and determining and responding to recipient's training and technical assistance (T/TA) needs. SAMHSA currently manages grant programs that provide prevention, treatment, recovery support services, and T/TA for substance use treatment and mental health providers along the continuum of care including prevention, harm reduction, treatment, and recovery. To carry out OMB Circular A-102[1] and 2 CFR Part 215.51[2], SAMHSA must collect grant program information necessary to ensure compliance with Federal and programmatic requirements.

SAMHSA's grant recipients are currently required to submit various types of performance reports in accordance with their individual program requirements. For example, recipients often submit bi-annual progress reports as one form of information collection.

When required, performance reports shall generally contain, for each award, brief information on each of the following:

- Update on the status of key personnel required by the grant and staffing levels proposed by the recipient.
- Annual number of clients served, or individuals trained compared to the proposed/planned and the actual clients served/individuals trained.
- Comparison of actual progress and accomplishments with the goals and objectives established for the period.
- Obstacles and next steps for achieving established goals that were not met, if appropriate.
- Success stories of positive outcomes of clients served or impact of the program on the community.
- Other pertinent information including, when appropriate, program specific questions that reflect statutory requirements, the agency's strategic priorities, and/or program's policy goals.
- Information previously requested in a grant Notice of Funding Opportunities (NOFO).

SAMHSA program offices have ever-evolving monitoring needs, dependent on both internal and external factors, such as, but not limited to current grant recipient activities and needs; uses of federal funds; changes to aspects of programs based on statutory authority, federal regulations or policy, and/or Congressional appropriations; availability of program office funds for site visits (desk monitoring); matters of importance related to national health and safety needs of the public, or other events that lead

[1] Circular A-102: https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A102/a102.pdf

[2] 2 CFR Part 215.51: https://www.govinfo.gov/content/pkg/CFR-2012-title2-vol1/pdf/CFR-2012-title2-vol1-subtitleA.pdf

to program changes. There are times when standardized collections of quantitative and qualitative information allows for program offices the ability to monitor recipient activities and needs.

A generic clearance would provide SAMHSA's program offices the flexibility to create and use tailored information collection templates based on current program reporting requirements. This is important to allow for SAMHSA's:

- Monitoring of compliance with federal practice, guidelines, and requirements,
- Oversight of the implementation of the scope of the grant activities with the grant recipients' proposed project,
- Assessment of the efficiency and efficacy of recipient activities,
- Quick understanding of and remediation to national, regional, and/or site-specific issues,
- Provision of additional support and technical assistance, as needed,
- Documentation of promising practices, innovative services, and program strengths, and
- Flexible and responsive oversight of federal funds.

SAMHSA is requesting the following Terms of Clearance:

> Consistent with other generic clearances, HHS/SAMHSA will submit each individual IC for OMB review, along with a brief description of the purpose of the pretest, sample design if applicable, any respondent incentives planned, and individual burden. OMB will either approve or provide comments on the individual request within 5 working days of receipt.

2. Purpose and Use of Information

The data collections will be designed to standardize program monitoring and performance reports of SAMHSA's grants. Program monitoring is a post-award process through which SAMHSA assesses a recipient's programmatic performance and business management performance. Monitoring activities are necessary to ensure timely action by SAMHSA to support grant recipients and protect federal interests. A variety of performance reports will be used for collection which can include, but is not limited to, the following information:

- Number of grant recipients per program
- Hours for a grant recipient to complete a performance report
- Summary of information collected in the report
- Information requested in Grant NOFOs
- Key Personnel and Staffing Updates
- Clients and Individuals served in the time frame for the performance report
- Priority areas served by the program
- Success stories
- Program specific questions

Program offices will use information collected under this generic clearance to monitor funding recipient activities and to provide support or take appropriate action, as needed. This could include:

- Oversight and analysis of programmatic performance
- Assessment of progress towards meeting required activities objectives outlined in the funding announcement.
- Confirmation of compliance with grant requirements: determining whether federal grants are being used for the purposes for which they are made and taking appropriate actions for non-compliance and enforcement.
- Verification that programs/projects initiated by grant recipients are carried out in a manner consistent with the approved project goals and objectives, and in a manner consistent with SAMHSA's expectations.
- Understand any shifts in key personnel or issues with staff retention.
- Confirmation and assessment of grant recipient's subrecipient partnerships.
- Program assessment: collecting additional information on the status, activities, and accomplishments of grant recipients.
- Day-to-day activities, activities performed at specified intervals, and periodic evaluations of performance that are required by statute or policy.
- Determination of certain aspects of continued performance (e.g., continued funding).
- Determine if additional actions/support (e.g., T/TA) are needed to increase the potential for success or to protect federal interests (e.g., enforcement actions).

The information gathered will be used primarily for internal purposes, but aggregate data may be included in public materials to support findings from other data sources.

The following are some examples of monitoring data that might be submitted as an IC:

- Information about approaches to demonstrating compliance with required activities and proposed allowable activities.
- Aggregated count of services, treatment, equipment, aggregate test results, or activity that is a policy priority reflected in required or allowable activities.
- Assessment of aggregate project outputs and outcomes
- Data about caseloads and information about barriers to processing certain caseloads

Example activities that would be out of scope for this generic include:

- Information collections for federally sponsored evaluations.
- Information collections for GPRA performance measures.
- Information included in the Standard Form - Performance Progress Report (SF-PPR) or the Federal Financial Report (FFR).

For the purpose of this generic collection, the following types of reports and templates will be used:

- Progress Reports – annual, biannual, quarter
- Grant Closeouts
- Site Visit Report Template
- Other

The information reported on the form will be provided to SAMSHA in performance reports (including annual, bi-annual, and quarterly progress reports) throughout the life of the grant. The

information will be collected in the format of performance reports that each grant recipient will upload on the eRA Commons system, under the "progress report" tab of the system. The information uploaded into this online system is immediately live and accessible to SAMHSA Government Project Officers (GPO) for monitoring and administration purposes.

Table 1: Data Collection Instrument

Form	Timeline	Type of Information

A program-specific IC will be submitted to Office of Information Regulatory Affairs (OIRA) for each individual request, along with the Generic submission template (Attachment A).

3. Use of Information Technology

Grant recipients submit their performance reports in the electronic Research Administration (eRA) grants management system. eRA is used to conduct electronic transactions for the receipt, review, award, and monitoring of grant awards and is developed, managed and supported by NIH's Office of Extramural Research, but used by agencies, such as SAMHSA, to support their grant activities. Grant recipients may be required to enter and retrieve information pertinent to their grants through electronic forms closely resembling the paper forms (i.e., fillable PDFs or tailored online data management systems). Use of information technology will be described in each program-specific ICR.

4. Efforts to Identify Duplication

The items collected under this request are necessary to assess grant recipient performance. SAMHSA is promoting the use of consistent performance and outcome measures across all programs; this effort will ultimately result in less duplication, and will reduce the burden on grant recipients that results from data demands associated with individual programs. This type of information is already required to be reported at least annually in a non-standardized and open ended long-narrative format. This generic process standardizes the approach and limits the burden because it limits the information that is reported to and collected by SAMHSA.

No similar data are available. Program offices regularly review existing information available in materials such as grant applications, ongoing client level GPRA data and financial management, and documents or other materials developed by the grant recipient throughout the performance period. This information would be used in conjunction with data collected under these generic information collections, but would not duplicate existing information available to SAMHSA.

SAMHSA has an internal review process that will examine each data collection effort to be conducted under this generic clearance – to prevent internal duplication of effort and to ensure that appropriate data collection instruments are developed. SAMHSA is confident that the procedures in place ensure that there will be no duplication. Due to the nature of SAMHSA's unique mission and programs, no similar data exists.

5. Involvement of Small Entities

These collections will not have an adverse impact on small entities.

6. Consequences If Information Collected Less Frequently

Less frequent collection of information would impact SAMHSA's ability to effectively monitor funding recipient activities and to respond to grant recipient needs in a timely manner.

Data collection related to the programmatic performance is crucial for SAMHSA and the respective grant recipients to adequately monitor the effectiveness of the programs and make necessary adjustments, if needed, to meet the objectives.

All the information collected from each grant recipient is critical for assessing the performance and impact in their communities. Without this information, SAMHSA will be unable to:

- Determine whether grant recipients are meeting their proposed targets of services or training provided.
- Identify and assist grant recipients address potential roadblocks preventing the grant recipient to meet their proposed targets for this program.

7. Consistency with the Guidelines in 5 CFR 1320.5(d)(2)

This information collection fully complies with the guidelines in 5 CFR 1320.5(d)(2). There are no special circumstances.

8. Consultation Outside the Agency

The notice required by 5 CFR 1320.8(d) was published in the Federal Register on April 13, 2023 (88 FR 22465). No comments were received in response to this notice.

9. Payment to Respondents

No payments or gifts are provided to any of the respondents.

10. Assurance of Confidentiality

Contact information (e.g. name, email address, phone number, etc.) may be collected for the purpose of following up. Respondents will be informed of intended use of their contact information. Additionally, program offices may request client files to review if information on files is in compliance with program requirement (ex. existence of required information, type/content of information). The program offices will inform respondents that information collected will be used for purposes related to SAMHSA's monitoring of funding recipients. This could include sharing resulting information about the funding recipient in reports to Congress, for investigations by federal entities such as the HHS Office of the Inspector General and the US Government Accountability Office, or other related purposes.

Any assurances of confidentiality will be described in each program-specific ICR.

11. Questions of a Sensitive Nature

Information collections under this proposed generic clearance are not expected to include sensitive questions. Each program-specific IC will provide information about any potentially sensitive questions.

12. Estimates of Annualized Hour Burden

Type of Respondent	Number of Respondents	Responses per Respondent	Total Responses	Hours per Response	Total Annual Burden Hours	Hourly Wage Cost	Total Hour Cost
Progress Report Template (Annual)	4,000	1	4,000	8	32,000	$26	$832,000
Progress Report (Interim)	2,500	2	5,000	6	30,000	$26	$780,000
Grant Closeouts	1,000	1	1,000	10	10,000	$26	$260,000
Site Visit Report Template	4,000	1	4,000	6	24,000	$26	$624,000
Other	4,000	1	4,000	6	24,000	$26	$624,000
TOTAL	**20,000**		**28,000**		**180,000**		**$3,120,000**

13. Estimates of Annualized Cost Burden to Respondents

There are neither capital or startup costs nor are there any operation and maintenance costs. There are no other costs associated with this information collection.

14. Estimates of Annualized Cost to the Government

The current annual estimated cost to the government for the Generic ICR per year is $2,000,000. Approximately $31,737 per year represents SAMHSA costs to manage/administrate the Generic and the associated performance reports collected for 25% of one employee in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality area (GS-13, Step 5).

15. Changes in Burden

This is a new data collection.

16. Time Schedule, Publication and Analysis Plans

Any plans to publish results will be described in individual ICRs under this generic clearance.

17. Display of Expiration Date

The expiration date for OMB approval will be displayed on the data collection instruments for which approval is being sought.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement.