

SUPPORTING STATEMENT

**U.S. Department of Commerce
National Telecommunications and Information Administration
Public Wireless Supply Chain Innovation Fund Grant Program Post-Award Baseline/Expenditure
Plan**

SUPPORTING STATEMENT PART A

Abstract

This request is required for NTIA to collect performance information from eligible grant recipients through reporting and monitoring, to comply with the Public Wireless Supply Chain Innovation Fund (PWSCIF or Innovation Fund), authorized by Section 9202(a)(1) of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283, 134 Stat. 3388 (Jan. 1, 2021) (FY21 NDAA) and appropriated by Div. A., Section 106 of the CHIPS and Science Act of 2022, Pub. L. No. 117-167, 136 Stat. 1392 (Aug. 9, 2022).

Justification

- 1. 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 collection of information.**

The Innovation Fund is authorized Section 9202(a)(1) of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283, 134 Stat. 3388 (Jan. 1, 2021) (FY21 NDAA). The Innovation Fund aims to foster competition, lower costs for consumers and network operators, support innovation across the global telecommunications ecosystem, and strengthen the 5G supply chain. The overall objectives include unlocking opportunities for innovative companies, particularly small and medium enterprises, to compete in a market historically dominated by a few suppliers, some of which present a high security risk. NTIA will make up to \$140,500,000 available for federal financial assistance under this the first Innovation Fund NOFO. NTIA expects to make awards within the following funding range: \$250,000 to \$50,000,000.

This NOFO is the first in a series that NTIA will issue and administer under the Public Wireless Supply Chain Innovation Fund (Innovation Fund). In response to this first NOFO, NTIA looks forward to receiving and reviewing a broad range of applications proposing creative ways to: (1) expand industry-accepted testing and evaluation to effectively facilitate and assess the interoperability, performance, and/or security of open and interoperable, standards-based 5G radio access networks; and (2) develop new and/or materially improve existing testing methodologies to test, evaluate, and validate the interoperability, performance, and/or security of these networks, including their component parts, in order to address needs not currently met by industry-accepted tests and best practices.

The Office of Management and Budget (OMB) requires agencies administrating grant programs to implement post-award financial and performance reporting for those programs¹. The Uniform

¹ See OMB Circular A-102, *Grants and Cooperative Agreements with State and Local Governments*, (REVISED 10/7/94, As Further Amended 8/29/97), §2(a); OMB Circular A-110, *Uniform Administrative Requirements for*

Administrative Requirements, Cost Principles, and Audit Requirement and the Department of Commerce Financial Assistance Standard Terms and Conditions authorizes NTIA to require performance reports from PWSCIF grant recipients².

As part of the reporting requirement detailed in the Notice of Funding Opportunity (NOFO) for the PWSCIF Program, award recipients are required to submit a Baseline/Expenditure Plan and an SF-425 Financial Report biannually. (Grant recipients will also be required to submit a Biannual Performance Progress Report (PPR) and a Final and Closeout Report, which are still under review by the program.) Award recipients are to follow the reporting requirements described in Sections A.01, Reporting Requirement, of the Department of Commerce Financial Assistance Standard Terms and Conditions (dated November 12, 2020). Additionally, in accordance with 2 C.F.R. Part 170, all recipients of a federal award made on or after October 1, 2010, are required to comply with reporting requirements under the Federal Funding accountability and Transparency Act or 2006 (Pub. L. No. 109-282).

Forty-five days after award has been made, grant recipients will be required to submit a Baseline report to the NTIA Federal Program Officer listed on the recipient's award documents. The Baseline Report will contain information as prescribed in 2 C.F.R. 200.329 and the Department of Commerce Financial Assistance Standard Terms and Conditions (dated November 12, 2020), Section A.01.

As indicated in the NOFO, the grant recipient shall submit this report with respect to the entire performance period that will include planned activities and major milestones and spending by quarter for the period of performance, that:

1. Include planned activities and major milestones
2. Describe spending by quarter for the period of performance
3. Complies with performance reporting requirements as prescribed in 2 C.F.R. § 200.329 (<http://go.usa.gov/xkVgP>) and [Department of Commerce Financial Assistance Standard Terms and Conditions](#) (dated November 12, 2020), Section A.01.

Recipients must maintain sufficient records to substantiate all information above upon request.

NTIA is seeking OMB approval for the collection of the Baseline Report to effectively administer and monitor the grant program to ensure the achievement of PWSCIF Program purposes and account for the expenditure of federal funds to deter waste, fraud, and abuse.

- 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.**

NTIA will collect information on the performance of individual PWSCIF Program awards through the Baseline Report. The Baseline Report, submitted 45 days after the date of award, asks a series of

Grants and Agreements With Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations, (REVISED 11/19/93, As Further Amended 9/30/99), Subpart C, §21; OMB Circular A-136, *Financial Reporting Requirements*, (REVISED 6/10/09), §II.3.

² Department of Commerce Uniform Administrative Requirements for Grants, §14.51.

questions that broadly address project progress and monitoring needs of program personnel by getting planned information milestone progress and expenditure plan.

Recipients of U.S. Department of Commerce and NTIA grants also should be cognizant of the access to records requirements set forth at 2 C.F.R. § 200.337. NTIA will protect confidential and proprietary information from public disclosure consistent with applicable law, including the Trade Secrets Act, as amended (18 U.S.C. § 1905) and the Economic Espionage Act of 1996 (18 U.S.C. § 1831 *et seq.*). In the event that a submission contains information or data deemed to be confidential commercial information or that otherwise should not be publicly disclosed, that information should be identified, bracketed, and marked as Privileged, Confidential, Commercial or Financial Information. Based on these markings, the confidentiality of the contents of those pages will be reviewed for protection consistent with applicable law.

Additionally, some of the information submitted in the course of applying for funding under this Program or provided in the course of its grant management activities may be considered law enforcement sensitive or otherwise important to national security interests. This may include threat, risk, and needs assessment information, and discussions of demographics, transportation, public works, and industrial and public health infrastructures. In the event that a submission contains such information or data, that information should be identified, bracketed, and marked appropriately. Based on these markings, the confidentiality of the contents of those pages will be reviewed for protection consistent with applicable law. The applicant should be familiar with the regulations governing Protected Critical Infrastructure Information (6 C.F.R. Part 29) and Sensitive Security Information (49 C.F.R. Part 1520), as these designations may provide additional protection to certain classes of homeland security information.

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 burden.

Collection of all information will be accomplished through electronic submissions. Analysis and aggregation of information will not be done using technical analysis techniques. All submissions will be analyzed individually.

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 Question 2

The Baseline Report is unique to the PWSCIF Program. The reports ask specific questions relating to the program's performance. NTIA may only collect this information from PWSCIF Program recipients, and it is not available elsewhere.

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

The program is limiting requested information in the Baseline Report to only that which the program needs to successfully administer the program.

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 burden.

Without the information requested on the Baseline Report, NTIA cannot effectively ensure that grant recipients are planning to spend their grant dollars and plan for major program milestones in a way that is consistent with the purposes of the PWSCIF Program. NTIA will be able to understand the grant recipients' spending plans utilizing the SF-425 Federal Financial Report and Baseline Report. NTIA will use the information collected from each grant recipient to effectively administer and monitor the grant program and account for the expenditure of federal funds to deter waste, fraud, and abuse.

In the absence of collecting this information, NTIA would lack the means to evaluate grant recipients' progress toward achieving PWSCIF Program purposes and priorities. Moreover, without these reports, the grants could be the subject of waste, fraud, and abuse of federal funds. Therefore, it is necessary for the NTIA to collect information using these reports.

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;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

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

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

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

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

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

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **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;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **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**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **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.**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 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 in response to these comments. Specifically address comments received on cost and hour burden.**

NTIA provided the 60-day notice in the Federal Register, published on April 17, 2023 (Vol.88, No. 73, p. 23407) and did not receive any comments from the public as of the end of the comment period on June 16, 2023. The 60-day notice can be found at: <https://www.govinfo.gov/content/pkg/FR-2023-04-17/pdf/2023-08011.pdf>.

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

NTIA will not provide gifts or payments to PWSCIF grant recipients.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a Systems of Records Notice (SORN) or Privacy Impact Assessment (PIA), those should be cited and described here.**

NTIA will protect confidential and proprietary information in performance and financial reports from public disclosure to the fullest extent authorized by applicable law, including the “Freedom of Information Act,” as amended (5 U.S.C. § 552 et seq.), the “Trade Secrets Act,” as amended (18 U.S.C. § 1905 et seq.), and the “Economic Espionage Act of 1996,” as amended (18 U.S.C. §1831 et seq.).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

This collection of information does not contain any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

- **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 under ‘Annual Cost to Federal Government’.**

NTIA developed burden estimates for the Baseline Report based on an activity breakdown analysis of the reporting forms. A team of consultants reviewed the forms in detail. Individuals on the team estimated how much time it would take for them to perform the following activities:

- Review instructions;
- Collect and process information;
- Adjust existing practices to comply with the rules of the information collection;
- Search data sources;
- Complete and review the response (on a field-by-field basis); and
- Transmit or disclose the information.

The analysis team then averaged out their burden hour estimates for each activity to produce a final activity breakdown, which added up to the burden hours for individual forms. NTIA estimates that it will award roughly 22 grants in total.

Type of Form	# of Respondents (a)	Annual Responses per Respondent (b)	Total Annual Responses Expected per Year (c) = (a) x (b)	Hour Burden Per Response (d)	Aggregate Hour Burden (e) = (c) x (d)
Baseline Report	22	1 (one-time, not annual)	22 (one-time, not annual)	20	440
Total	22	1	22	20	440

NTIA estimates that responses to the questions included in the proposed baseline report require an average of 20 hours to complete. Estimating the maximum number of respondents at 22, this would result in a total burden of 440 hours.

The total estimated costs to respondents or record-keepers are based on the following:

- The total hour burden of the collection of information equaling 440 hours.
- Respondents will be for-profit companies, non-profit companies, institutions of higher education, industry groups, and consortia consisting of two or more such entities. To estimate reasonable staff expenses to respond to this information collection, NTIA reviewed the Bureau of Labor Statistics (BLS) Occupational Outlook Handbook and determined that the Administrative Services Manager description closely aligns with the positions of recipient staff responsible for completing this request. BLS lists a median salary of \$99,290 annually, amounting to \$47.73 per hour. <https://www.bls.gov/ooh/management/administrative-services-managers.htm>
- Total burden cost equals \$21,001.20 for the Baseline Report.

Estimated Annualized Respondent Cost

Type of Respondent / Occupational Title	Form	Number of Respondents	Number of Responses per Respondent	Annual Burden per Response (Hrs)	Hourly Wage Rate	Total Burden Costs
Administrative Services Manager	Baseline Report	22	1	20	\$47.73	\$21,001.20
Total						\$21,001.20

The estimate in hours of the burden of the collection of information does not include the hours for the Standard Forms associated with this grant program. The burden hour estimates for the Standard Forms was included on NTIA's Request for Common Form to use the previously approved OMB information collection instruments.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- **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 consider 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 collections 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 is no additional cost burden to the respondents resulting from this collection of information.

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 information.

Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.

NTIA intends to begin making grant awards for the initial rounds of PWSCIF grant program funding by August 8th, 2023. The costs to the federal government for this information collection also will include:

- a. NTIA staffing
- b. Contract Services to support grants processing and monitoring
- c. Grants Office Services to make financial awards; and
- d. Other related expenses.

The administrative budget ceiling in the CHIPS Act for PWSCIF Program is “not more than 5 percent of the amounts allocated pursuant...in a given fiscal year may be used by the Assistant Secretary of Commerce for Communications and Information to administer the programs funded from the Public Wireless Supply Chain Innovation Fund.” This is a non-recurring collection of limited cost to NTIA. NTIA will collect and store the information in electronic format for a maximum of 22 responses and will not need to acquire additional information systems for the collection and storage of the data. Therefore, costs associated with printing, equipment, and support services are incidental to general NTIA administrative and infrastructure costs. The cost to review responses is a small portion of the salaries of staff time assigned to the program. Total annual staff time is not expected to exceed 300 hours, which is less than 1% of total program staff time.

Estimated Cost: 22 hours at \$45.14 per hour (based on GS-12 staff salary³) = \$994.64.

Annualized Costs to the Federal Government

Staff	Grade/ Step	Salary	Fringe (if applicable)	% of Effort (Annually)	Total Annualized Cost to Gov't
NTIA Program Staff	12	\$45.14 per hour	Included in hourly estimate	1 hours per respondent, 22 respondents	\$45.14 * 1 hour * 22 respondents = \$992.64
Total Cost to the Government					\$992.64

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

This is a new information collection.

16. For collections of information whose 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.

³Office of Personnel Management, 2023 General Schedule (GS) Pay & Leave – Salaries & Wages for Washington-Baltimore-Arlington, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB_h.aspx.

The information collected will not require complex analytical techniques. The information collected may be tabulated or published in aggregate on the NTIA website in the future.

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.

Approval is not being sought to not display the expiration date for OMB approval of the information collection. The standard OMB control number is expected to be displayed on the paper and electronic versions of the Performance (Technical) Report.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

The agency certifies compliance with 5 C.F.R. § 1320.9 and the related provisions of 5 C.F.R. § 1320.8(b)(3).

SUPPORTING STATEMENT PART B

A. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The proposed Baseline Report will not employ statistical methods to analyze the information collected from respondents.