**SUPPORTING STATEMENT**

**OMB Control Number 2700‑0092**

**INFORMATION COLLECTION TITLE:** Financial Assistance Awards/Grants and Cooperative Agreements

**INFORMATION COLLECTION TYPE:** Revision of a currently approved information collection

A. JUSTIFICATION

1. **Explain the circumstances that make the collection of information necessary.**

The National Aeronautics and Space Act of 1958 charges NASA to plan, direct and conduct aeronautical and space activities and research and development in certain technologies. NASA’s mission is to enable a safer, more secure, efficient and environmentally-friendly air transportation system through aeronautics research; operate the International Space Station and prepare for human exploration beyond low Earth orbit; explore the Earth-Sun system, our own solar system, and the universe beyond; and develop the crosscutting, advanced and pioneering new technologies needed for current and future missions, benefiting the aerospace industry and other agencies and addressing national needs.

NASA’s Mission Directorates and Program Offices are assigned with the responsibility of implementing NASA’s vision, mission, and values. To this end, the Mission Directorates, NASA Centers and Program Offices solicit proposals for research and research related, i.e., engagement, projects through the release of various notice of funding opportunities (NOFO) in a wide range of science and technology disciplines.

Proposers responding to NASA NOFOs are required to submit their proposals electronically via the NASA Solicitation Proposal Integrated Review and Evaluation System (NSPIRES) or Grants.gov. For proposals submitted via NSPIRES, registration is required for all organizations, and individuals named in the proposal. As part of the NSPIRES registration process, NASA requests a limited set of demographic data for gender, race, ethnicity, or disability from all NSPIRES registrants, such as Principal Investigators, Co-Investigators, etc. Submission of the demographic data is voluntarily and does not affect the eligibility for an award. When grant and cooperative agreement proposals are received, each demographic data submitted will be separated from the proposal and will not be a factor in the proposal review and award process.

All proposals are subject to a merit review with the objective of selecting the recipient most likely to be successful in delivering results based on the program objectives outlined in the NOFO. A financial assistance award (i.e., grant or cooperative agreement) is issued for successful proposals, along with terms and conditions of the award and reporting requirements.

This information collection is necessary to assist NASA make informed decisions when selecting proposals to carry out its mission, and ensure that all qualified proposers are evaluated based solely on the quality of the proposal submitted. Furthermore, the information collected will provide insight and the opportunity to better manage the award process in accordance with Title 2 of the Code of Federal Regulations (CFR) Part 200 (2 CFR 200) and 2 CFR Part 1800, and address the Government Accountability Office’s (GAO) recommendations to collect additional data to improve oversight of NASA funds and title IX compliance.

**2.** **Indicate how, by whom, how frequently, and for what purpose the information will**

**be used.**

Information collected will be used by the NASA Mission Directorates, NASA Shared Services Center (NSSC), Office of the Chief Scientist, Office of Procurement, and the Office of the Chief Financial Officer. Absence of the information provided in grant recipients’ proposals, reports, and recordkeeping would result in NASA’s inability to carry out its mission and to comply with various statutory requirements (e.g., the Chief Financial Officers (CFO) Act, on the accountability of public funds and maintenance of an appropriate internal control system).

The following table depicts projected information collection frequency and its intended use:

|  |  |  |
| --- | --- | --- |
| INFORMATION/ REPORTS | FREQUENCY | USE |
| Proposals | Occasionally | Select qualified proposals |
| Federal Financial Reports (SF-425) | Milestones | Report expenditures |
| Property Reports\* | Annually | Financial Reporting/Assess success of programs |
| Patent & New Technology Reports\* | Annually | Protect rights of Government & recipients |
| Performance/Progress Reports | Annually | Assess progress of project |
| Administrative and funding changes to grant awards | Occasionally | Ensure proper execution of the award project and add funding, as necessary.  |
| Recordkeeping | Continuous | Ensure proper accounting of funds and maintenance of records. |
| Demographic Data  | Occasionally  | 1. Ensures compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., Title IX of the Education Amendments of 1972, 20 U.S.C. A § 1681 et seq., Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq., and NASA’s implementing regulations.
2. Helps NASA determine whether there is bias in grant selections (i.e., establishes whether PIs have been successfully receiving grant awards overtime or whether they are consistently unsuccessful.
3. Enables NASA to enhance equity in its grants programs in accordance with the strategic and equity action plan
 |

\****These reports have a separate NASA information collection and are not calculated in the estimated burden hour***

**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.**

Proposals are submitted through NSPIRES or Grants.gov. The use of these systems reduces the need for proposers to submit multiple copies to the agency. It allows proposers to submit multiple proposals to different funding announcements without registering each time. Electronic funds transfer is conducted through the Department of Health and Human Services (HHS) Payment Management System (PMS) for recipients. In addition, NASA encourages the use of computer technology and is participating in government-wide efforts to extend the use of information technology to more agency grant-related processes.

**4. Describe efforts to identify duplication.**

Each financial assistance award is a unique project; therefore, there is no known duplication of information.

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

The burden on small business has been minimized by decreasing the frequency of reporting consistent with applicable laws, Executive Orders, regulations, and prudent business practices.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

NASA has a continuing commitment to monitor the operation of its review and award processes to identify and address any inequities based on gender, race, ethnicity, or disability of its proposed Principal Investigators/Co-Investigators. If the collection of demographic data is not conducted, NASA will not be able to analyze differences, if any, regarding grant awards to women, men, and minorities.

Absence of proposal information collection or reductions in the frequency of collections could prevent NASA from achieving its mission and also jeopardize the proper accountability of public funds and property.

**7. Explain any special circumstances that would cause an information collection to be**

**conducted in certain manners as listed on the 83-I form.**

The collection of information conducted is consistent with manners listed on the 83 -I form. No special circumstances apply.

**8. Identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR § 1320.8 (d), soliciting comments on the information collection before submission to OMB.**

60-day FRN: 88 FR 17273 on 3/22/2023. No comments were received.

30-day FRN: 88 FR 44413 on 7/12/2023.

**9. Explain any decision to provide any payment or gift to respondents, other than**

**remuneration of contractors or grantees.**

No gifts or payments will be provided to respondents.

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

Any information collected through NSPIRES will be maintained in accordance with the Privacy Act of 1974. The applicable system of records notice (SORN) is NASA 10OAAR, Opportunities and Associated Reviewers. It can be found at: https://www.federalregister.gov/documents/2023/03/14/2023-05168/privacy-act-of-1974-system-of-records

Additionally, NASA uses Privacy Impact Assessments (PIA) as a tool to identify, evaluate and mitigate privacy risks, and ensure compliance to federal privacy regulations. A PIA analyzes how PII is collected, used, stored, and protected by NASA and serves as documentation that the collection is being conducted in full compliance with applicable federal laws, statutes, government-wide, and NASA policies and procedures. In addition, the PIA examines the risk to the individual caused by the collection of Information in Identifiable Form (IIF).

NASA publishes its Privacy Impact Assessment summaries on the NASA Privacy Impact Assessment at https://www.nasa.gov/content/privacy-impact-assessment-pia-summaries.

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.

No questions of a sensitive nature are involved.

**12. Provide estimates of the burden hour associated with the collection of information.**

The annual burden estimate of 1,712,434 hours, associated with the collection of information, is calculated as follows:

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| --- | --- | --- | --- | --- | --- | --- |
| **INFO/****REPORTS** | **No. of Respondents** | **No. of Responses** | **Hours per Report** | **TOTAL HOURS** | **Hourly Rate** | **Cost** |
| Proposals (includes demographic data) | 11,000 | 11,000 | 120 | 1,320,000 | $37.09 | $48,958,000.00  |
| Financial Reports (SF 425) | 7,000 | 28,000 | 9 | 252,000 | $37.09 | $9,346,680.00  |
| Performance Reports | 7,000 | 7,000 | 8 | 56,000 | $37.09 | $2,007,040.00 |
| Administrative and funding changes to grant awards | 7,217 | 7,217 | 2 | 14,434 | $37.09 | $535,357.00 |
| Recordkeeping | 7,000 | 7,000 | 10 | 70,000 | $37.09 | $2,596,300.00  |
| **TOTALS** | **39,217** | **60,217** | **28.43** | **1,712,434** | **37.09** | **$63,514,177.00**  |

There are approximately 7,000 financial assistance awards open at any one time. It is estimated that out of the approximately 11,000 proposals received each year, NASA awards approximately 2,228 new awards. The period of performance for these financial assistance awards is usually three to five years. NASA award recipients submit Federal Financial Reports (SF 425) each quarter to PMS. Performance, property and patent reports are filed annually. Historical records indicate that on average 7,217 administrative and funding changesare submitted annually.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

Total annual cost burden is estimated to be $63,514,177.00. This figure is derived by applying a burdened labor rate of $37.09 to the total number of 1,712,434 hours. This rate of $37.09 is for a GS-12, step 5 (2022), as this is the comparable skill level that would be required to perform these duties.

**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, and any other expense that would not have been incurred without this collection of information.**

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| --- | --- | --- | --- | --- | --- |
| **INFO/****REPORTS** | **TOTAL RESPONSES/YEAR** | **HOURS PER REPORT** | **TOTAL HOURS** | **HOURLY PAY RATE** | **Total Cost/Year** |
| Proposals (includes demographic data) | 11,000 | 50 | 550,000 | $49.20 | $27,070.000.00 |
| Financial reports (SF-425 | 28,000 | 3 | 84,000 | $37.09 | $3,115,560.00 |
| Performance reports | 7,000 | 4 | 28,000 | $49.20 | $1,716,400.00 |
| Administrative and funding changes to grant awards | 7,217 | 5 | 36,085 | $37.09 | $1,338,392.00 |
| Recordkeeping | 7,000 | 10 | 70,000 | $37.09 | $2,596,300.00 |
| **TOTAL** | **60,217** | **12.755** | **768,085** | **$46.64** | **$35,826,652.65** |

A burdened labor rate varies depending on task. Labor costs range from an average of $61.30/hour to $37.09, which is equivalent to a GS-15, Step 5, and GS-12, Step 5 (2022), charged to collecting, processing and reviewing proposals; reviewing/processing financial reports; performance reports; and recordkeeping. The government employee rate used is considered an appropriate skill level for the tasks to be performed. Estimated annual cost to the Government is **$35,826,652.65.**

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

There have been no program changes. Reported adjustments correspond to changes in occupational pay scales as reported by the Office of Personnel Management (OPM) and an adjustment to the number of respondents submitting proposals.

**16. For collections of information intended for publication, outline plans for tabulation and publication.**

There are no collections of information intended for publication to report on for this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.

NASA is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain all exceptions to the “Certification for Paperwork Reduction Act Submissions.”

The NASA Office of Procurement, Procurement Management and Policy Division sponsors this information collection. NASA does not take exception to the content of 5 CFR1320.9 and the related provisions of 5 CFR 1320.8(b)(3).

Christiane Diallo, NASA HQ - Office of Procurement, Procurement Management & Policy Division

**B. Collections of Information Employing Statistical Methods**.

This information collection does not employ statistical methods.