Department of the Treasury Information Collection Request – Supporting Statement

Application, Reports and Recordkeeping for the Social Impact Partnerships to Pay for Results
Act (SIPPRA) grants program
OMB No. 1505-0260

A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION NECESSARY.

Authorized under the Bipartisan Budget Act of 2018, the Social Impact Partnerships to Pay for Results Act (SIPPRA or Act), amends Title XX of the Social Security Act, 42 U.S.C. 1397 et seq., to provide \$100 million in funding to implement "Social Impact Partnership Demonstration Projects" (projects) and feasibility studies to assist states and local governments in applying for project funding. SIPPRA authorizes the Secretary of the Treasury (Secretary) to enter into award agreements with state or local governments for projects addressing entrenched social problems. SIPPRA requires the Department of the Treasury (Treasury) to conduct a request for proposals for projects, make award decisions, and enter into project award agreements. Treasury is publishing a Notice of Funding Availability (NOFA) seeking applications for projects, and anticipates that ten or more persons will respond to its notice announcing availability of funding for SIPPRA projects.

Although Treasury is asking applicants to use the SF-424 family of common forms for their applications, in order to effectively and efficient assess and evaluate applications and ensure that projects comply with statutory requirements, Treasury is also soliciting additional detailed information from applicants. This request only includes the burden for this additional information. The burden for the SF-424 forms is covered under OMB Control Numbers 4040-0004, 4040-0006, 4040-0007, 4040-0008, 4040-0009, 4040-0010 and 4040-0013. The additional information includes the following components:

- Project Narrative, to include an Executive Summary;
- Project Narrative Attachments, to include project budget, partnership agreements, partner qualifications, independent evaluator qualifications, evaluation design plan, independent evaluator contract, outcome valuation), legal compliance, and (optional) additional supporting documentation such as a preexisting feasibility study;
 - o The evaluation design plan is discussed further below
- Unique Entity Identifier (UEI) and SAM registration;
- Copy of application proposing privileged or confidential information to be redacted;
- Treasury Office of Civil Rights and Diversity Assurances and Certifications
- Administrative Reporting, including Performance and Financial Report, Evaluation Progress Reports, and Final Evaluation Report;
- Records Retention

Evaluation Design Plan

The evaluation design plan (EDP) is critical for several reasons and is required by the statute; for example, one of the seven delineated purposes of SIPPRA is to "incorporate outcomes measurement and [RCT] or other rigorous methodologies for assessing program impact." 42 U.S.C. § 1397n. It would not be possible to adequately evaluate an applicant's ability to implement an intervention that can be studied in a rigorous way such that the effect of the intervention is not due to chance or other economic conditions or circumstances, and is only caused by the intervention, without an evaluation design plan. The need is explicit in SIPPRA at § 1397n-1(c)(19), (20), and (21), all of which have been incorporated into Treasury's request in its NOFA for an evaluation design plan.

Treasury asks that applicants include 15 discrete pieces of information in their EDP. These components, described in the NOFA, are essential to assessing the quality of the proposed EDP and the potential to generate causal estimates of the intervention (see above). The NOFA also directs applicants to describe their evaluation methodology (RCT or quasi-experimental) and evidence standards as required by statute.

Further, SIPPRA also requires that the federal government pay a recipient only after an independent evaluator determines a project "has met the requirements specified in the agreement and achieved an outcome as a result of the intervention." § 1397n-2(c)(2). It also establishes a Federal Interagency Council on Social Impact Partnerships (Interagency Council), chaired by the Director of OMB, with ten members representing ten Federal agencies.¹ Among their responsibilities, the Council must:

prior to approval by the Secretary, certify that each State and local government application for a social impact partnership contains rigorous, independent data and reliable, evidence-based research methodologies to support the conclusion that the project will yield savings to the State or local government or the Federal Government if the project outcomes are achieved;

certify to the Secretary that each State or local government that has entered into an agreement with the Secretary for a social impact partnership project under this division and each evaluator selected by the head of the relevant agency under section 1397n–4 of this title has access to Federal administrative data to assist the State or local government and the evaluator in evaluating the performance and outcomes of the project; and

certify to the Secretary, in the case of each approved social impact partnership that is expected to yield savings to the Federal Government, that the project will yield a projected savings to the Federal Government if the project outcomes are achieved, and coordinate with the relevant Federal agency to produce an after-action accounting once

¹ The head of each of the following federal agencies shall designate one officer or employee to be a Council member: Department of Labor, Department of Health and Human Services, Social Security Administration, Department of Agriculture, Department of Justice, Department of Housing and Urban Development, Department of Education, Department of Veterans Affairs, Department of the Treasury, Corporation for National and Community Service. § 1397n-5(b).

the project is complete to determine the actual Federal savings realized, and the extent to which actual savings aligned with projected savings²

The EDP is essential to ensure that these statutory goals and objectives are achieved and to assist the Interagency Council in making its certification determinations.

Independent Evaluator Reports

SIPPRA requires the federal government to complete certain project evaluation duties, including the collection from award recipients of periodic project outcome evaluation reports produced by each project's independent evaluator. SIPPRA § 1397n-4(d) and (e).

OIRA Terms of Clearance

Treasury considered the Terms of Clearance OMB issued on February 12, 2019 related to the SIPPRA program and determined that the Benefit-Cost Analysis methodology will be used to calculate value for this NOFA and worked with OMB and the Interagency Council to define benefits.

2. USE OF DATA

Treasury is publishing a Notice of Funding Availability under citation 84 FR 5560 soliciting applications for projects under SIPPRA. The information collected under this NOFA: (1) identifies eligible recipients and activities; (2) helps identify which applications sufficiently address all statutory requirements and which proposed projects are the most competitive; (3) determines the appropriate amount of funding; (4) ensures compliance with SIPPRA and Federal laws and policies on grants (Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR 200, herein OMB Uniform Guidance); (5) tracks recipients' progress; and (6) collects statutorily mandated reports prepared by recipients' contracted independent evaluators.

The application Executive Summary will assist Treasury and the Interagency Council is streamlining the processing of applications and in optimizing the eligibility phase of application review. The application Standard Forms, Project Narrative, and Project Narrative Attachment components of the grant application are intended to provide Treasury with the information necessary to properly evaluate and assess applications and to make sure applications include statutorily mandated information. Additionally, certain components of the application, and in particular, the Outcome Valuation, will enable the Interagency Council to determine whether to make statutorily mandated certifications regarding the proposed projects.

The Unique Entity Identifier and the SAM registration are both required under Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR Part 200.

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² § 1397n-5(a).

To comply with Uniform Guidance performance and financial monitoring and reporting requirements, 2 CFR 200.327–200.329, Treasury is requiring performance and financial report from grant recipients. SIPPRA requires that recipients submit progress reports prepared by an independent evaluator on a periodic basis and before the schedule time of outcome payments. SIPPRA § 1397n-4(d). SIPPRA also requires that recipients submit a final report prepared by an independent evaluator within six months of a project's completion. SIPPRA § 1397n-4(e). Per the statute, Treasury and the Interagency Council will use these reports to determine if outcome payments are warranted.

Treasury is requiring recipients under this NOFA to comply with the Uniform Guidance's record retention requirement, 2 CFR 200.333, which requires them to maintain records for three years after grant close-out.

3. USE OF INFORMATION TECHNOLOGY TO REDUCE BURDEN

Treasury will manage the application submission process with the Salesforce software system customized for the SIPPRA program. Eligible recipients complete fillable forms and return the grant application electronically via Grants.gov. Eligible recipients enter progress information on fillable forms and submit the progress reports electronically through Salesforce automated grants system. Data from grant applications and reports are stored electronically.

4. EFFORTS TO IDENTIFY DUPLICATION

This information collection is for a statutorily mandated grant program. The information is not known to overlap with any other data collected under any other information collections at Treasury.

5. IMPACT ON SMALL BUSINESSES AND ENTITIES

This collection of information is not expected to have a significant impact on small entities. The applications are limited to certain states, local governments and tribes named as eligible entity recipients in SIPPRA. SIPPRA does not contain any provisions permitting Treasury to modify requirements for local governments that may be considered "small entities." However, all efforts have been made to minimize burden on small entities therein.

6. <u>CONSEQUENCES OF LESS FREQUENT COLLECTION AND OBSTACLES TO REDUCE BURDEN</u>

Minimum collection requirements: Applicants will submit grant applications following requests for project applications; periodic reporting will enable the Federal government to assess progress of the activity under the grant; and, as mandated by SIPPRA § 1397n-4(d) and (e), periodic project evaluation reports, prepared by independent evaluators. Treasury would not be able to adhere to SIPPRA requirements with less frequent collections.

7. SPECIAL CIRCUMSTANCES REQUIRING DATA COLLECTION TO BE INCONSISTENT WITH GUIDELINES 5 CFR 1320.5(d)(2).

There are no special circumstances requiring data collection to be inconsistent with Guidelines in 5 CFR 1320.5(d)(2).

8. FEDERAL REGISTER NOTICE/CONSULTATION WITH THE PUBLIC

In response to the Federal register notice dated April 26, 2022 (87 FR 246481), Treasury received ten public comments. Comments were received from America Forward, Green & Healthy Homes Initiative, Mathematica, Maycomb Capital, Nemours Children's Health, Quantified Ventures, Ryan Martin, Social Finance, the National Service Office for Nurse-Family Partnership & Child First and Third Sector Capital Partners. The summary of the comments and Treasury responses are below:

America Forward Comments dated June 27, 2022

Page No.	Summary of America Forward Comments	Treasury's Response
3	Recommend an expansive consideration of what "value" entails—including the consideration over the value provided over the full 10-year period.	Treasury accepts this comment and will expand the definition of value.
3	Recommend changes to the application process to reduce the upfront burden on applicants regarding evaluations.	Treasury accepts this comment and will clarify portions of the application.
3	Recommend refining the application criteria regarding acceptable quasi-experimental designs to enable a wider range of communities to participate in the program.	Treasury accepts this comment and will add language to better include reliable, evidence-based quasi-experimental designs.
4	Recommend engaging Interagency Council from the start of the process.	This comment is not pertinent to this Information Collection Request (ICR).
4	Recommend strengthening threshold reviews.	Treasury accepts this comment and will strengthen threshold reviews.
4	Recommend ensuring dedicated staff.	This comment is not pertinent to this Information Collection Request (ICR).
4	Recommend funding feasibility projects.	This comment is not pertinent to this Information Collection Request (ICR).
4	Recommend offering webinars and technical assistance.	Treasury has determined that technical assistance will not be

		feasible but will offer webinars.
5	Recommend providing an earlier forecast to	Treasury agrees and has been in
	potential applicants.	communication with its
		stakeholders.

Green & Healthy Homes Comments dated June 2022

Page No.	Summary of Green & Healthy Homes Initiative Comments	Treasury's Response
2	Recommend explicitly allowing for more varied evaluation plan models including quasi-experimental design criteria.	Treasury accepts this comment and will allow for reliable, evidence-based quasi-experimental designs.
2	Recommend an outcome valuation methodology that accounts for the present value of future federal cost savings that may accrue beyond the project term.	Treasury agrees with this comment and will require a benefit-cost analysis (BCA) over a period not exceeding ten years from the date implementation.
2	Recommend allowances for the fact that jurisdictions when signing on to multi-year models may still be subject to approvals that would be outside of the window to respond to the NOFA.	Treasury will allow draft agreements for consideration, but before awarding the formal authorization must be in place.
3	Recommend a longer application period.	Treasury accepts this comment and will lengthen the application period.

Mathematica Comments dated June 27, 2022

Page No.	Summary of Mathematica Comments	Treasury's Response
1	Recommend expanding beyond the randomized-controlled trials (RCTs) and quasi-experimental design.	Treasury disagrees and will only consider randomized-controlled trials (RCTs) and quasiexperimental designs.
2	Recommend reviewing Chapter 5 of the Utkrisht Impact Bond midline.	This comment is not pertinent to this Information Collection Request (ICR).

Maycomb Capital Comments dated June 24, 2022

Page	Summary of Maycomb Capital Comments	Treasury's Response
No.		

2	Recommend a broader definition of "federal	Treasury accepts this comment and
	value" that includes the benefits to individuals	will expand the definition of federal
	and communities when assessing the	value.
	effectiveness of spending.	
2	Recommend flexibility in identifying rigorous	Treasury disagrees and will only
	and reliable outcomes and creativity in the	consider randomized-controlled
	evaluation design.	trials (RCTs) and reliable evidence
		based quasi-experimental designs.
3	Recommend a shorter window of time to	Treasury disagrees and will not
	submit applications to leave more time for	reduce the application period.
	project implementation and launch projects.	

Nemours Children's Health Comments dated June 24, 2022

Page	Summary of Nemours Children's Health	Treasury's Response
No.	Comments	
2	Recommend utilizing benefit-cost analysis and	Treasury accepts the
	include individual and social benefits, in	recommendation and will use
	addition to Federal, state, or local budgetary	benefit-cost analysis (BCA)in the
	savings in their outcome valuation	outcome valuation methodology.
	methodologies.	
3	Recommend implementing rigorous analytical	Treasury accepts the
	techniques to project the benefits that will	recommendation and will require a
	accrue beyond the outcome measurement for a	benefit-cost analysis (BCA) over a
	full ten-year period, even if it extends beyond	period not exceeding ten years from
	legislative and other deadlines.	the date implementation.
4	Recommend utilizing outcome payments tied	Treasury will only make payments
	to individual's status at the time of	if pre-determined outcomes are
	measurement.	achieved as a result of the
		intervention.
5	Recommend using quasi-experimental	Treasury accepts this comment and
	evaluation designs and other approaches that	will consider reliable, evidence-
	move government spending toward more	based quasi-experimental designs.
	evidence-based approaches.	

Quantified Ventures Comments dated June 27, 2022

Page No.	Summary of Quantified Ventures Comments	Treasury's Response
2	Recommend increasing the amount of time applicants have to develop and submit applications.	Treasury accepts this comment and will lengthen the application period.
2	Recommend benefit-cost analysis as the outcome valuation methodology.	Treasury accepts this comment and will use the benefit-cost analysis (BCA) as the outcome

		methodology.
3	Recommend reducing the data collection	Treasury will require rigorous and
	burden through limited mandatory	reliable independent data.
	performance measures, additional flexibility	
	around performance data collection, and a	
	quality-improvement oriented validation	
	approach.	

Ryan Martin Comments dated June 25, 2022

Page	Summary of Ryan Martin Comments	Treasury's Response
No.		
1	Recommend striking a balance between	This comment is not pertinent to
	providing guidance on one hand and	this Information Collection Request
	considering novel evaluation and impact	(ICR).
	measurement ideas on the other—being careful	
	to avoid stifling creativity and innovation.	
1	Recommend that the outcome methodology	Treasury accepts this comment and
	allow the interagency council to take into	will expand the definition of
	account a wider range of potential savings	savings.
	when calculating the value of the outcome.	
2	Recommend the application review process be	Treasury accepts the
	more efficient and more visible to applicants.	recommendation and will improve
		the application process and be more
		transparent.

Social Finance Comments dated June 27, 2022

Page No.	Summary of Social Finance Comments	Treasury's Response
1	Recommend that projects be allowed to include current-state costs that accrue not only to the federal government, but also to the applicant jurisdiction and other governments as well.	Treasury accepts this recommendation and has expanded the definition of costs.
1	Recommend allowing non-fiscal costs to be included such as the value of a statistical life.	Treasury accepts this recommendation will allow non-fiscal costs such as the value of statistical life.
1	Recommend allowing projects to impute some costs rather than directly measure them.	Treasury may consider imputed costs if costs are not directly measurable.
2	Recommend a longer time horizon for the measurement of outcomes meaning that projects should be able to count reasonable future benefits within their benefit-cost	Treasury accepts this recommendation and will require a benefit-cost analysis (BCA) over a period not exceeding ten years from

	analysis.	the date implementation
2	Decommend taking into account the federal	Commences.
2	Recommend taking into account the federal value of outcomes and measures that may not directly tie to reduced federal outlays or increased federal tax revenue but still generate quantifiable public and social value.	Treasury accepts this recommendation and has broadened the definition of value.
2	Recommend including savings derived from oversubscribed federal block grant programs since there is implicit value to the federal government in improving the financial stability of low-income families.	Treasury will take a case-by-case approach as to whether oversubscribed federal block grant programs will be considered savings.
2	Recommend allowing for the "present value" of especially well-evidenced benefits accruing beyond 10 years to be included in project valuation.	Treasury disagrees and will allow a benefit-cost analysis (BCA) over a period not exceeding ten years from the date implementation commences.
3	Recommend accepting and, where appropriate, encouraging other reliable, evidence-based research methodologies in addition to randomized controlled trials.	Treasury accepts this recommendation and will consider reliable evidence-based quasiexperimental research methodologies in addition to randomized controlled trials.
3	Recommend eliminating the statistical significance requirement.	Treasury disagrees with this recommendation and will require statistical significance.
4	Recommend streamlining the required components of the application as much as possible and make clear the additional steps in the review and award process upfront.	Treasury accepts the recommendation and will streamline the application and provide upfront guidance on the review and award process.
4	Recommend removing the requirement that signed letters of commitment from all partners and funding be arranged upfront.	Treasury will allow draft agreements during the application stage but will require formal agreements before making an award.
4	Recommend streamlining the processes for reviewing, scoring, and awarding projects to reduce the time to award.	Treasury accepts this recommendation and will streamline the application process.
4	Recommend allowing more time to respond— at least double the three months allowed under the original NOFA.	Treasury agrees and will lengthen the application period.
5	Recommend clarifying the period of performance in the NOFA, including when it will start relative to the grant award being made.	Treasury accepts and will clarify the period of performance in the NOFA and will work directly with the awardees to determine period of

		performance start dates.		
5	Recommend explicitly including a preparation	Treasury disagrees and requires at		
	period prior to the start of the period of	least draft agreements during the		
	performance which would allow projects to	application period. All agreements		
	procure the evaluator and/or service providers,	must be finalized before an award		
	raise capital, etc.	can be made.		

The National Service Office for Nurse-Family Partnership dated June 27, 2022

Page No.	Summary of The National Service Office for Nurse-Family Partnership Comments	Treasury's Response
1	Recommends allowing for the benefits that accrue beyond the SIPPRA project timeline to count toward the "present value."	Treasury accepts this recommendation and will require a benefit-cost analysis (BCA) over a period not exceeding ten years from the date implementation commences.
2	Recommend including the value to state and local governments when considering outcomes payments.	Treasury accepts this recommendation and will expand the definition of value.
2	Recommend allowing quasi-experimental and other evidence-based research methodologies.	Treasury accepts this recommendation and will allow reliable, evidence-based quasi-experimental designs.
2	Recommend eliminating the statistical significance requirement.	Treasury disagrees with the recommendation and will require statistical significance.
2-3	Recommend reducing the time it takes to make award announcements and laying out the additional steps in the award and review process in the NOFA.	Treasury accepts this recommendation and will reduce the time it takes to make an award and will describe the review process in the NOFA.

Third Sector Partnership dated June 27, 2022

Page	Summary of Third Sector Partnership	Treasury's Response	
No.	Comments		
2	Recommend an audit be conducted of all required application questions to ensure that information is only be asked one time.	Treasury accepts this recommendation and will not make duplicative request for information	
2	Recommend that "federal value" includes not only savings and revenue gains by the federal government, but a broader reflection of participants' outcomes.	Treasury accepts this recommendation and will expand the definition of federal value in the second NOFA.	
2	Recommend extending the timeline for when this "value" can be realized.	Treasury accepts this recommendation and will extend the timeline for when value can be realized.	

3	Recommend providing clearer guidelines regarding the requirements for evaluations.	Treasury accepts this recommendation and will provide clearer guidelines regarding evaluation requirements.	
3	Recommend refining the application criteria regarding acceptable quasi-experimental designs to enable a wider range of communities to apply.	Treasury accepts this comment and will consider reliable, evidence-based quasi-experimental designs.	
3	Recommend that the level of detail and information being requested of the evaluation plan be less rigorous in the application phase and instead further fleshed out in subsequent application review phases or during the postaward planning period.	Treasury disagrees and will require in the application phase a rigorous and detailed evaluation plan.	
4	Recommend that it be made clear that the costs for an intermediary are neither included in the 15 percent limitation on evaluation nor are the costs tied to outcome payments.	Treasury will make it clear that the costs for an intermediary are not included in the 15 percent limitation on evaluation but the costs should be a portion of the costs accounted for in the BCA as intermediary costs are programmatic costs.	
4	Recommend that up to 10 percent of an agreement be made available to the state or local government for operational start-up costs.	Treasury has determined that funds cannot be made available to the state or local government for operational start-up costs.	
4	Recommend offering webinars and technical assistance.	Treasury has determined that technical assistance will not be feasible but will offer webinars.	
4	Recommend providing more extensive guidance for applicants regarding outcome valuation.	Treasury accepts and will provide more guidance for applicants regarding outcome valuation.	
5	Recommend that it be made clear the expected timeline and elements involved in each solicitation procurement including submission, review, negotiation and award.	Treasury accepts the recommendation and will provide the timeline including the elements involved.	
5	Recommend publishing a list of acceptable and unacceptable outcome valuations.	Treasury has determined that it is not feasible to publish a list of acceptable and unacceptable outcome valuations.	
6	Recommend strengthening threshold reviews.	Treasury accepts this comment and will strengthen threshold reviews.	
6	Recommend clarifying recertification process.	Treasury accepts the comment and will provide clear guidance about the application review and certification.	

Treasury published a notice in the Federal Register to solicit comments on August 30, 2022 in 87FR 53052. Treasury received one comment from Andrew Reamer. The summary of the comments and Treasury responses are below:

Andrew Reamer Comments dated September 4, 2022

Page	Summary of Andrew Reamer Comments	Treasury's Response
No.		
1	Request the relevant Information Collection	Treasury has not created specific
	documents be uploaded.	forms or documents for the
		application or attachments.

9. <u>EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO</u> RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts are provided to respondents.

10. ASSURANCE OF CONFIDENTIALITY

SIPPRA establishes a Commission on Social Impact Partnerships (Commission) whose principal obligation is to make recommendations to Treasury regarding the funding of SIPPRA demonstration project and feasibility studies. SIPPRA § 1397n-6. The Commission is subject to the provisions of the Federal Advisory Committee Act (FACA), which generally requires that documents made available to the Commission be made available for public inspection and copying. 5 U.S.C. App. 2 10(b). Treasury expects to provide to the Commission all complete applications received under this NOFA from eligible applicants and expects to make these applications available for public inspection and copying. However, FACA also provides that trade secrets and commercial or financial information that is privileged or confidential under the Freedom of Information Act (confidential business information) need not be made publicly available. 5 U.S.C. 552(b)(4). To assist Treasury in complying with FACA's public disclosure requirements while protecting confidential business information in accordance with FACA, Treasury is requesting applicants to propose redactions of confidential business information. An applicant may omit pages for which it does not propose any redactions. Treasury will review the redactions proposed by each applicant. The Department provides no other assurances of confidentiality to respondents.

SIPPRA requires that certain information related to grants be published on a website, available to the public, to be established and maintained by the Interagency Council. SIPPRA § 1397n-10. Treasury's SIPPRA website will link to this website and thus will also include this information.

SIPPRA requires that the independent evaluators for projects conducted under SIPPRA grants submit periodic written progress reports and a final written report to the Interagency Council and the head of the relevant agency, which in turn are required to submit the reports to the Secretary of the Treasury and the committee of jurisdiction of the House of Representatives and the Senate.

SIPPRA § 1397n-4. These reports may be made available to the public under the Freedom of Information Act, 5 U.S.C. 552.

11. JUSTIFICATION OF SENSITIVE QUESTIONS

No sensitive questions are asked of respondents. Applicants must provide qualifications of key project personnel and partners. They may voluntarily provide curriculum vitae for key project personnel and partners, but the application does not require that personally identifiable information (PII) is collected.

12. ESTIMATE OF THE HOUR BURDEN OF THE COLLECTION.

Social Impact Partnerships to Pay for Results Act (SIPPRA) Application Materials and Recordkeeping burden.

Reporting	# Respondents	# Responses Per Respondent	Total annual Responses	Hours per response	Total Burden in Hours
Application: -Project Narrative & Attachments	25	1	25	300	7,500
Quarterly Performance Report	5	1	20	8	160
Total	30	2	45	308	7,660

13. Estimated total annual cost burden to respondents

There are no annualized capital/startup costs for the eligible recipients to provide the information collection for the NOFA. Receiving grant awards under SIPPRA specifically does not require grantees to incur startup costs beyond those costs generally associated with receiving federal financial assistance. However, SIPPRA §1397n-2(d) and (e) require that recipients contract with independent evaluators who are to prepare progress reports and final reports, respectively, to be submitted to the Interagency Council and the head of the relevant agency. The amount of time and cost of these reports will vary depending on factors such as the size and length of the project, the type of intervention, whether a randomized controlled trial or a quasi-experimental method (both methods permitted under SIPPRA) are selected, and geographic area. As explained in the NOFA, SIPPRA permits the federal government to pay up to 15% of the overall project award amount to a recipient for the cost of its independent evaluation activity; the aggregate cap on evaluation funds under this NOFA is \$6.1 M.

14. Estimated cost to the federal government.

SIPPRA permits Treasury to allocate \$2 million annually from the SIPPRA appropriation for program administrative and operating expenses, which include the software Treasury will use to support the grant application process and application review activities.

15. Reasons for change in burden

Discussions with stakeholders resulted in the adjustments to the burden worksheet.

16. Plans for tabulation, statistical analysis and publication

SIPPRA §1397n-2(d) requires Treasury to publish, within 30 days of making an award, a notice in the Federal Register with certain information about the award. See Appendix B. Additionally, SIPPRA §1397n-10 requires that the Interagency Council "establish and maintain a public website" that displays information about SIPPRA projects, listed in Appendix C.

Treasury also anticipates conducting analysis of project data. These analyses will include assessments of eligibility and effectiveness of program activities (e.g. types of activities, amounts funded) as well as compliance checks.

Pursuant to SIPPRA §1397n-2(d) and (e), progress reports and final reports, respectively, prepared by independent evaluators must be submitted to the Interagency Council and the head of the relevant agency, and in turn, to Treasury and each committee of jurisdiction in the House of Representatives and the Senate.

Treasury anticipates that federal oversight bodies, such as GAO and Treasury's OIG, will also review and analyze date within these reports.

17. Display of the expiration date for OMB approval

Upon approval by OMB, Treasury plans to display the expiration date for OMB approval of the information collection on all instruments. Treasury believes that displaying expiration dates on these instruments before OMB approval would be confusing to applicants for and recipients of SIPPRA grants.

18. Exceptions to certification statement

There are no exceptions to the certification statement.

Appendix A – Project outcomes

SIPPRA § 1397 n-1(b) requires that a project must produce one or more measurable, clearly defined outcomes that result in social benefit and Federal, State, or local savings in one of the following ways:

- 1. Increasing earnings and work by individuals in the United States who are unemployed for more than 6 consecutive months.
- 2. Increasing employment in earnings of individuals who have attained 16 years of age but not 25 years of age.
- 3. Increasing employment among individuals receiving Federal disability benefits.
- 4. Reducing the dependence of low-income families on Federal means-tested benefits.
- 5. Improving rates of high school graduation.
- 6. Reducing teen and unplanned pregnancies.
- Improving birth outcomes and early childhood health and development among lowincome families and individuals.
- 8. Reducing rates of asthma, diabetes, or other preventable diseases among low-income families and individuals to reduce the utilization of emergency and other high-cost care.
- 9. Increasing the proportion of children living in two-parent families.
- 10. Reducing incidences and adverse consequences of child abuse and neglect.
- 11. Reducing the number of youth in foster care by increasing adoptions, permanent guardianship arrangements, reunifications, or placements with a fit and willing relative, or by avoiding placing children in foster care by ensuring they can be cared for safely in their own homes.
- 12. Reducing the number of children and youth in foster care residing in group homes, child care institutions, agency-operated foster homes, or other non-family foster homes, unless it is determined that it is in the interest of the child's long-term health, safety, or psychological well-being to not be placed in a family foster home.
- 13. Reducing the number of children returning to foster care.
- 14. Reducing recidivism among juvenile offenders, individuals released from prison, and other high-risk populations.
- 15. Reducing the rate of homelessness among our most vulnerable populations.

- 16. Improving the health and well-being of those with mental, emotional, and behavioral health needs.
- 17. Improving the educational outcomes of special-needs or low-income children.
- 18. Improving the employment and well-being of returning United States military members.
- 19. Increasing the financial stability of low-income families.
- 20. Increasing the independence and employee ability of individuals who are physically or mentally disabled.
- 21. Other measurable outcomes defined by the state or local government that result in positive social outcomes and Federal savings.

42 U.S.C. § 1397n-1(b).

Appendix B - Publication of Award in Federal Register

SIPPRA provides that not later than 30 days after entering into an agreement for an award, Treasury must publish a notice in the *Federal Register* that includes the following information about the award:

- 1. The outcome goals of the project.
- 2. The target population that will be served by the project.
- 3. A description of each intervention in the project.
- 4. The expected social benefits to participants who receive the intervention and others who may be impacted.
- 5. The detailed roles, responsibilities, and purposes of each federal, State, or local government entity, intermediary, service provider, independent evaluator, investor, or other stakeholder.
- 6. The payment terms, the methodology used to calculate outcome payments, the payment schedule, and performance thresholds.
- 7. The project budget.
- 8. The project timeline.
- 9. The project eligibility criteria.
- 10. The evaluation design.
- 11. The metrics that will be used in the evaluation to determine whether the outcomes have been achieved as a result of each intervention and how these metrics will be measured.
- 12. The estimate of the savings to the federal, State, and local government, on a program-by-program basis and in the aggregate, if the agreement is entered into and implemented and the outcomes are achieved as a result of each intervention.

42 U.S.C. § 1397n-2(d).

Appendix C – SIPPRA Website

The Federal Interagency Council on Social Impact Partnerships shall establish and maintain a public website that shall display the following:

- (1) A copy of, or method of accessing, each notice published regarding a social impact partnership project pursuant to this division.
- (2) A copy of each feasibility study funded under this division.
- (3)For each State or local government that has entered into an agreement with the Secretary for a social impact partnership project, the website shall contain the following information:
 - (A) The outcome goals of the project.
 - (B) A description of each intervention in the project.
 - (C) The target population that will be served by the project.
 - (D) The expected social benefits to participants who receive the intervention and others who may be impacted.
 - (E) The detailed roles, responsibilities, and purposes of each Federal, State, or local government entity, intermediary, service provider, independent evaluator, investor, or other stakeholder.
 - (F) The payment terms, methodology used to calculate outcome payments, the payment schedule, and performance thresholds.
 - (G) The project budget.
 - (H) The project timeline.
 - (I) The project eligibility criteria.
 - (J) The evaluation design.
 - (K) The metrics used to determine whether the proposed outcomes have been achieved and how these metrics are measured.
- (4) A copy of the progress reports and the final reports relating to each social impact partnership project.
- (5) An estimate of the savings to the Federal, State, and local government, on a program-by-program basis and in the aggregate, resulting from the successful completion of the social impact partnership project.

42 U.S.C. § 1397n-10.