

**Supporting Statement
Data Collection for
SF-424 Key Contacts; Project Abstract; Project/Performance Site
Location(s)
SF-424 OMB Control No. 4040-0010**

This is a request for a revision to an existing common form. The SF-424 Key Contacts; Project Abstract; Project/Performance Site Location(s) forms are an OMB-approved common form (4040-0010). Previously, 26 Federal grant-making agency were using this collection. This information collection will now be utilized by 51 Federal grant-making agencies and additional grant-making entities. To improve the transparency of reading and enhance user-friendliness of the supporting statement A, language modifications were implemented within sections 3 through 16. For section 14, Cost to the Federal Government was adjusted to the 2023 base general schedule. Grants.gov is requesting a revision of this collection to allow for data reporting and publication by agencies requesting to use the common form. The information collection (IC) expires on November 30, 2025. *Grants.gov* seeks a three-year clearance of these collections.

A. Justification

1. Need and Legal Basis

The Office of Federal Financial Management (OFFM) leads efforts in government-wide grants management to assure that Federal grants to non-Federal entities are managed properly and spent in accordance with laws and regulations. Working cooperatively with Federal grant-making agencies and non-Federal entities, OFFM establishes policies and guidelines through OMB's Uniform Administrative Requirements via 2 CFR Part 200, which establishes uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities. Grants.gov serves as a repository for Federal grant-related forms.

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards establish the reporting requirements fulfilled by this form. This collection also partially fulfills OFFM responsibilities under Pub. L. 109-282, Sec 2590, Federal Funding Accountability and Transparency Act of 2006, and Pub. L 106-107, Sec 468, Federal Financial Assistance Management Improvement Act of 1999.

The Federal Funding Accountability and Transparency Act of 2006 (FFATA) required, among other things, that grant financial assistance awards be displayed on a publicly accessible and searchable website, USAspending.gov. The Digital Accountability and Transparency Act (DATA Act), Pub. L. 113-101, expanded on the FFATA by establishing governmentwide standards and holding agencies accountable for the quality of the data.

2. Information Users

The form is used by non-Federal entities to apply for grants, by Federal grants management staff to evaluate applicants for Federal financial assistance, and for post-award management and analysis.

3. Improved Information Technology

Although agencies can allow recipients to submit electronically, or via other methods, they are only authorized to collect the information approved under this information collection.

4. Duplication of Similar Information

There is no other source for the information reported on this form.

5. Small Businesses

The information requirements do not pertain to small business or other small entities.

6. Less Frequent Collection

No less frequent collection is feasible.

7. Special Circumstances

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards establish the requirements fulfilled by this form.

8. Federal Register Notice/Outside Consultation

The Grants.gov Program Management Office managed by HHS published the current Key Contacts; Project Abstract; Project/Performance Site Location(s) forms collection (4040-0010) for public comment in the Federal Register for 60-day comment on August 14, 2023 (88 FR 55054). Interested individuals were invited to send comments regarding any aspect of this collection of information. No public comments were received.

9. Payment/Gift to Respondents

Not applicable since there is no payment to respondents, other than remuneration of grantees upon award.

10. Confidentiality

The grant-making agencies will maintain the authoritative copy of all application materials and data. The information will be consistent with OMB policies related to the administration of Federal grants as well as agency policies and practices for access to electronic and paper records. If application forms are submitted through the Grants.gov Apply mechanism, Grants.gov will maintain only transmission records pertaining to the files. Grants.gov will not maintain application materials and data. The information collected on this form is not being collected, maintained, or retained by HHS except for HHS-specific applications. If that changes, an appropriate Privacy Act statement or other assurance of confidentiality, as appropriate, will be provided and HHS will revise this PRA package. For agencies requesting the use of this form via Request for Common Forms (RCF), each agency would be responsible for providing their own unique PRA statement (to collect their burden and respondent information)

and Privacy Act statement unique to their agency. Data will be kept private to the extent allowed by law.

11. Sensitive Questions

Not applicable since there are no sensitive questions.

12. Burden Estimate

As this is a Common Form, burden is reported only for HHS. By aggregating the agency’s estimates as reported from the Grants.gov data call, an estimate of the total burden of the information collection was developed.

HHS receives approximately 4,566 Key Contacts, 230 Project Abstract, and 127,281 Project/Performance Site Location forms annually for a total of 132,077 IC submissions. It takes applicants approximately 1 hour on average to complete each application. Cumulatively, HHS reports that the total burden to applicants is approximately 132,077 hours.

Section A. Estimated Annualized Burden Hours to Respondents

Key Contacts; Project Abstract; Project/Performance Site Location(s) Forms

Estimated Annualized Burden to Respondents

AGENCY	IC NAME	Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden on Respondent per Response in Hours	Total Burden Hours
HHS	Key Contacts	4,566	1	4,566	1	4,566
	Project Abstract	230	1	230	1	230
	Project/Performance Site Location(s)	127281	1	127281	1	127281
TOTAL		132,077		132,077		132,077

Section B. Burden Cost

SF-424 Application for Financial Assistance Estimated Annualized Cost to Respondents

Cost To Respondents				
AGENCY	Type of Respondent	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
HHS	Grant Writer	\$ 30.00	132077	\$3,962,310
TOTAL			132077	\$3,912,310

The Estimated Annualized Cost to Respondents assumes that the Hourly Wage Rate for a grant writer is \$30. The Total Burden Hours times the Hourly Wage Rate produces the Total Respondent Cost, which is \$3,962,310.

13. Capital Costs

There is no cost burden to respondents and record keepers associated with the use of the Key Contacts; Project Abstract; Project/Performance Site Location(s) forms.

14. Cost to the Federal Government

The proposed Key Contacts; Project Abstract; Project/Performance Site Location(s) forms are based on an OMB-approved form currently in use. There is no projected incremental increase in the cost burden to the Federal Government with the implementation of the renewed Key Contacts; Project Abstract; Project/Performance Site Location(s) forms. Each agency currently has existing personnel, systems and processes (or other resources) in place to receive and review their grant applications. Any additional cost for agency system development, maintenance and enhancements should not be attributed to use of the Key Contacts; Project Abstract; Project/Performance Site Location(s) forms, and therefore its use is not expected to alter annualized Federal costs.

Cost to Government				
Total Annual Responses	Agency Personnel Time to Review (Hours)	Total Burden Hours on Agency Personnel	Average Grants Administrative Hourly Salary	Estimated Annual Cost to Federal Government for Form Review
132077	1	132077	\$49	\$6,471,773

Agency personnel time to review the form is estimated at 1 hour per form. Based on 132077 responses per year, then 132077 hours are estimated personnel hours to review. Grants administrative personnel generally are in the GS9 - 15 range. Based on a step one average of these grades, an average hourly salary is \$49 per hour. Therefore, 132077 hours x \$49 = \$6,471,773 of estimated annual cost to the federal government to review the form.

15. Program or Burden Change

This information collection is for a common form, and HHS is the sponsoring agency for this common form. As such, this information collection accounts only for HHS use of the form and, therefore, does not reflect any change in burden. All other agencies that will use this common form for grant reporting, including for data reporting and publication as indicated in Question 16, will submit their agency burden separately through the RCF process.

16. Publication and Tabulation Dates

Although HHS has no immediate plans for publication or tabulating the data collected, the agency reserves the right to publish and tabulate data collected on this form and acknowledges that other agencies that submit requests to use this common form may have to comply with reporting requirements that result in tabulating and publishing data that is collected on the forms. For example, agencies are required to report financial assistance awards data on USAspending.gov. Other agencies may be required to collect data that is reported to Congress and ultimately released to the public. Therefore, while this revision does not include any changes in burden hours for HHS's use of the common form, it does reflect the possibility of data reporting and/or publication by other agencies. In those cases, the agencies will comply with the requirements for the use of the common form and submit burden estimates for their respective reporting and recordkeeping to OMB for approval, and include an agency-specific Paperwork Reduction Act statement on their version of the common form.

If the data to be tabulated and/or published contains personally identifiable information that will be included in records that are subject to the Privacy Act of 1974 (5 U.S.C. 552a), agencies will be required to include on their version of the common form an agency-specific Privacy Act statement that notifies respondents of 1) the agency's authority for the collection, 2) whether providing the information is voluntary or mandatory, 3) the principal purpose(s) for which the information will be used, 4) the *routine uses* that may be made of the information (see 5 U.S.C. 552a(a)(7)), and 5) any effects on the individual of not providing certain information. Agencies will also be required to provide the Federal Register citation for the published system of records notice, or SORN (see 5 U.S.C. 552a(e)) that allows disclosure of the data. If a SORN has not been published, the Privacy Act statement must explain the status of the agency's system of records notice and indicate when the agency expects to submit the notice to OMB for review.

17. Expiration Date

Three years from OMB approval.

18. Certification Statement

Not applicable since there are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed in this information collection.