**OASH Performance Project Report (PPR)**

**for Grants and Cooperative Agreements New**

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**Supporting Statement for OASH Performance Project Report (PPR) for Grants and Cooperative Agreements**

**A. Justification**

1. **Circumstances Making the Collection of Information Necessary**

The Office of the Assistant Secretary for Health (OASH) oversees a broad range of federal financial assistance programs within the Office of the Secretary (OS), Department of Health and Human Services (HHS). This collection is necessary to meet basic requirements for performance monitoring of grants and cooperative agreements within the OASH portfolio.

The currently active OASH programs with discretionary grants and cooperative agreements include:

|  |  |  |
| --- | --- | --- |
| **Assistance Listing Number** | **Program Title** | **Grant Making Authorization** |
| 93.007 | Public Awareness Campaigns on Embryo Adoption | [42 U.S.C. §300u-3](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/www.govinfo.gov/content/pkg/USCODE-2021-title42/pdf/USCODE-2021-title42-chap6A-subchapXV-sec300u-3.pdf) (Section 1704 of the Public Health Service Act) |
| 93.085 | Research on Research Integrity | [42 U.S.C. § 241](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/www.govinfo.gov/content/pkg/USCODE-2021-title42/pdf/USCODE-2021-title42-chap6A-subchapII-partA-sec241.pdf)  (Section 301 of the Public Health Service Act) |
| 93.088 | Advancing System Improvements for Key Issues in Women's Health | [42 U.S.C. § 300u-1(a)](https://www.law.cornell.edu/uscode/text/42/300u-1), [300u-2(a)](https://www.law.cornell.edu/uscode/text/42/300u-2), and [300u-3](https://www.law.cornell.edu/uscode/text/42/300u-3) (Sections 1702(a), 1703(a), and 1704 of the Public Health Service Act) and [42 U.S.C. § 237a](https://www.law.cornell.edu/uscode/text/42/237a) (Section 229 of the Public Health Service Act) |
| 93.137 | Community Programs to Improve Minority Health Grant Program | [42 U.S.C. § 300u-6](https://www.law.cornell.edu/uscode/text/42/300u-6) (Section 1707 of the Public Health Service Act) |
| 93.217 | Family Planning Services | [42 U.S.C. § 300](https://www.law.cornell.edu/uscode/text/42/300u-6) (Section 1001 of the Public Health Service Act) |
| 93.260 | Family Planning Personnel Training | [42 U.S.C. § 300a–1](https://www.law.cornell.edu/uscode/text/42/300a-1) (Section 1003 of the Public Health Service Act) |
| 93.297 | Teenage Pregnancy Prevention Program | Program authorized annually in appropriation language. Most recently Division H, Title II of the Consolidated Appropriations Act, 2023 ([Public Law No. 117-328](https://www.congress.gov/117/plaws/publ328/PLAW-117publ328.pdf)) |
| 93.343 | Public Health Service Evaluation Funds | [42 U.S.C. § 238j](https://www.law.cornell.edu/uscode/text/42/238j) (Section 241 of the Public Health Service Act) |
| 93.344 | Research, Monitoring and Outcomes Definitions for Vaccine Safety | [42 U.S.C. § 300u-1](https://www.law.cornell.edu/uscode/text/42/300u-1) and [300u-2](https://www.law.cornell.edu/uscode/text/42/300u-2) (Sections 1702 and 1703 of the Public Health Service Act) |
| 93.899 | Minority HIV/AIDS Fund (MHAF) | Program authorized in annual appropriation. Most recently Most recently Division H, Title II of the Consolidated Appropriations Act, 2023 ([Public Law No. 117-328](https://www.congress.gov/117/plaws/publ328/PLAW-117publ328.pdf)) |
| 93.974 | Family Planning Service Delivery Improvement Research Grants | [42 U.S.C. § 300a-2](https://www.law.cornell.edu/uscode/text/42/300a-2) (Section 1004 of the Public Health Service Act) |

OASH grants and cooperative agreements cover a wide range of project types, including service, demonstration project, evaluation, research, training, and conference projects. Within each program, the awards are subdivided into cohorts aligned with the notices of funding opportunity (NOFOs) under which OASH issued the award. Currently, there are 47 cohorts of active awards across OASH. In any given year, OASH programs collectively monitor 450-550 active awards with another 200-300 inactive awards awaiting final reports as a prerequisite to closing the grant.

As a requirement required of [45 C.F.R. §75.301](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR911e5e1a30bfbcb/section-75.301), each recipient must submit a quarterly Federal Financial Report (FFR or SF-425) ([45 C.F.R. §75.341](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR235b0b854924ea0/section-75.341)) and a periodic Performance Progress Report (PPR) for each grant ([45 C.F.R. §75.342(b)(2)](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR235b0b854924ea0/section-75.342)). PPR reporting periods in OASH are scheduled quarterly, semi-annually, or annually, depending on the need determined by the program office using a narrative format that can vary by cohort. The PPR schedule is specifically aligned with the quarterly FFRs whenever possible to create a complete snapshot of the project’s progress at the end of the reporting period.

The NOFO announces the PPR reporting frequency during the competitive award process along with the performance measures. The PPR submission requirement is then incorporated into the terms and conditions of any award issued.

OASH intends to standardize PPR data collection for its recipients across its award portfolio with a single instrument suitable for any reporting cadence. This data collection is authorized under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards at [45 C.F.R. §75.301](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR911e5e1a30bfbcb/section-75.301) and [§75.342](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR235b0b854924ea0/section-75.342) currently in effect. This collection is also consistent with the requirements of [2 CFR §200.329](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR36520e4111dce32/section-200.329) of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and its proposed updates.

1. **Purpose and Use of Information Collection**

This data collection will provide the OASH program offices and the grants management team with documentation of individual recipient performance progress alongside the quarterly Federal Financial Report (FFR or SF-425). This collection will enhance grants oversight and performance monitoring. Currently OASH collects this information in a un-structured narrative format that varies by grant cohort.

Standardizing the information collection instrument in the proposed collection creates a structure using elements common to many federal grant programs. Adding structure and consistency to the PPR format across OASH programs will reduce recipient burden in submission of necessary information and reduce federal burden in assessing individual recipient and broader programmatic performance. A common structure will enhance cross-program comparisons and identification of practices worth broader dissemination. The additional structure will enable web-based collection and programmatic reporting.

The common elements are:

|  |  |
| --- | --- |
| **Section Heading** | **Element** |
| General Information (to be prepopulated by the grants management platform) | * Project Title * Period of Performance * Budget period * Reporting Period * Recipient Organization Name * Submitter Name * Submitter Phone and Email |
| Project Progress Information | * Project Work Plan Goal   + Project Subgoal(s)/Grantor Goal(s) (if applicable)     - Objective(s)       * Activity(ies) |
| Significant Project Accomplishments | * Accomplishment   + Relevant Project Goal(s)   + Outcome/Impact   + Barrier(s)/Challenge(s) Overcome |
| Broader Program Impacts | * General Broader Impacts * Impacts on Health Equity * Training and Technical Assistance * Sustainable Resources or Relationships * Lessons Learned for Similar Projects |
| Products and Dissemination | * Publications   + Publication type   + Standard citation and/or Hyperlink * Significant Presentations   + Description   + Hyperlink * Digital Presence   + Description   + Hyperlink * Other   + Description |
| Collaboration and Partnering Activities | * Partner Name   + Partnership Type (formal, informal)   + Partner Location   + Partner Role and Contribution |
| Project Evaluation Activities | * Evaluation Status   + Tools and techniques   + Implementation status   + Baseline collection completion   + Challenges * Lessons Learned   + Quality Improvement Feedback Implemented   + Preliminary Outcomes |

1. **Use of Improved Information Technology and Burden Reduction**

The OASH PPR information collection is specifically tailored for use in a web-based grants management platform. All OASH recipients use Grant Solutions for reporting PPR information, however, this collection as structured could be transitioned to any other grants management platform as needed in the future. The collection has been specifically designed to isolate the basic project reporting elements so that they may be combined in analyses with information from other data collections, even those on other platforms. The structured information is also intended to contribute to enhanced dashboards for monitoring at both the individual project and broader program office portfolio level.

1. **Efforts to Identify Duplication and Use of Similar Information**

As noted above, this collection is a regulatory requirement for HHS and federal grantees. Because publication and dissemination of project findings most often occurs at the end of grant, the information cannot be collected from published sources.

Some OASH programs have existing data collections that may include some of the proposed PPR data elements (e.g., Publications) in addition to collecting information beyond the scope of the PPR. Program offices will be afforded an appropriate window to transition collection of the overlapping data element(s) to the standardized PPR. Data from the PPR will be exportable for use by the program office alongside data from other program specific data collections that have OMB approval. Recipients will not report the same data twice.

1. **Impact on Small Businesses or Other Small Entities**

OASH funds numerous grants to community based organizations (CBOs) and small entities, many of whom are inexperienced when it comes to reporting on progress for federal grants. The collection is designed to guide inexperienced and experienced recipients through only those elements need to evaluate their specific project performance.

Although not all common elements in this collection are applicable to all OASH-supported awards, the majority of the elements are common to a substantial majority of OASH awards and are consistent with general performance reporting at other federal grant-making agencies.

For elements not applicable to a given cohort, recipients may indicate the item is either not applicable or not required by the program office. For example, the Title X Family Planning Services program may instruct recipients to indicate “not required” for Project Evaluation Activities because those service grants do not require the recipient to conduct a process and outcomes evaluation.

Furthermore, recipients will be given the option to indicate “nothing to report” for the reporting period. This option is intended to manage expectations in cohorts that use quarterly reporting, where not every element will have a reportable event each period.

1. **Consequences of Collecting the Information Less Frequent Collection**

PPRs for non-construction projects (OASH does not fund construction projects) “must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly affect program outcomes.” ([45 C.F.R. §75.342(b)(1)](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR235b0b854924ea0/section-75.342)). Each OASH program office determines the PPR reporting frequency for a given cohort of recipients in consultation with the grants management team. Cohorts with more recipients with less experience in managing a federal project will typically report on a quarterly basis, whereas cohorts with mostly experienced recipients or projects subject to less risk report annually. Several cohorts currently report semiannually.

1. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances that appear applicable to this information collection.

1. **Comments in Response to the Federal Register Notice/Outside Consultation**

The 60-day FRN Pg; 17860 Federal Register/Vol. 89, No. 49 was published on Tuesday, March 12, 2024.

There were no comments received.

1. **Explanation of any Payment/Gift to Respondents**

No payments or gifts will be provided to respondents.

1. **Assurance of Confidentiality Provided to Respondents**

Information provided in PPR submissions is subject to FOIA and Privacy Act requests as part of the official grant file.

1. **Justification for Sensitive Questions**

The information contains no sensitive questions. Social Security Numbers are not required nor expected to be part of any submission.

1. **Estimates of Annualized Hour and Cost Burden**

Staff from academia, community organizations, local/state/federal government, private sector, and tribal government and services organizations.

**12A.** **Estimated Annualized Burden Hours**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of**  **Respondent** | **Form**  **Name** | **No. of**  **Respondents** | **No.**  **Responses**  **per**  **Respondent** | **Average**  **Burden per**  **Response**  **(in hours)** | **Total Burden Hours** |
| **OASH Grant Recipient** | **OASH PPR** | **800** | **3** | **1** | **2400** |

**12B. Estimated Annualized Burden Costs Per Response per respondent:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of**  **Respondent** | **Total Burden**  **Hours** | **Hourly**  **Wage Rate** | **Total Cost per**  **Respondent** |
| Project Manager (Masters) | 2400 | $85.00 | $204000.00 |
| Total |  |  | $204000.00 |

1. **Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

OASH provides the reporting platform, currently Grant Solutions. This information collection is a regulatory requirement as described above. Information is currently being received primarily in narrative format from recipients in a less-structured format with guidance from the program offices. One time start-up costs for implementing this new collection in the web-based platform is $600,000 with an anticipated annual Operation and Maintenance (O&M) Costs/ recordkeeping cost of $120,480 beginning in FY2025. The O&M costs for this information collection will increase the overall annual O&M of the grants management system by approximately 16%.

Cost savings per PPR review and assessment are anticipated substantially as information will be more structured for programmatic review. For example, identification of missing elements will be automated and progress along the approved project plan more evident from reporting period to period. Furthermore, PPR data is subject to FOIA and Privacy Act requests. The enhanced format will facilitate the identification and consistency of material that requires redaction. A savings amount is difficult to estimate with current data.

The estimated total annual costs will be $720480.

1. **Annualized Cost to Federal Government**

**Estimated Annualized Costs to Federal Government:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of**  **Respondent** | **Total Burden**  **Hours** | **Cost per Response** | **Total Costs** |
| Reporting | 2400 | $85.00 | $204000.00 |
| Record Keeping | 2400 | $50.20 | $120480.00 |
| Total |  |  | $324480.00 |

The estimated total annualized costs to the federal government will be $324480.

1. **Explanation for Program Changes or Adjustments**

This is a new data collection.

1. **Plans for Tabulation and Publication and Project Time Schedule**

There are no specific plans for tabulation or publication of the data collection on the internet or in hard copy. However, recipients are notified a the time of application for a grant that any copyrighted works or data produced under the award may be shared by OASH per [45 C.F.R. §75.322](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75/subpart-D/subject-group-ECFR78b08d9c95aad03/section-75.322).

1. **Reason(s) Display of OMB Expiration Date is Inappropriate**

OMB Expiration Data will be displayed.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.