Corporation for National and Community Service (AmeriCorps) Applicant Operational and Financial Management Survey (OFMS) OMB Control Number 3045-0102

Justification – Part A Supporting Statement

Overview of Information Collection:

This is a request for renewal of an existing collection. This information collection comprises questions applicants answer related to operational and financial management when applying for grant funding for a new project or performance period (it is not required for continuation or renewal applications).

The following minor updates have been made to the form:

- Replace references to "CNCS" with "AmeriCorps"
- Replace "DUNS" number with "UEI"
- Replace "CDFA Number" with "Assistance Listing Number"
- Add field asking which grant competition the applicant is applying to with preset options
- Changed format of form from Microsoft Word to Sharepoint Form

1. Need & Method for the Information Collection.

The Corporation for National and Community Service dba AmeriCorps (AmeriCorps) awards grants to States, institutions of higher education, non-profit organizations, Indian Tribes, and U.S. Territories to operate AmeriCorps State, AmeriCorps National, AmeriCorps NCCC, AmeriCorps VISTA, Social Innovation Fund and AmeriCorps Seniors programs. When organizations apply for a grant for a new project or performance period, the organization must provide certain information regarding operational and financial management in order for AmeriCorps to asses the risk posed by providing the organization with Federal funding and to determine if the organization has adequate systems in place to meet all of the requirements for managing Federal grants and to comply with the Uniform Administrative Requirements for Federal Grants and OMB Cost Principles circulars. This allows AmeriCorps to meet its fiduciary responsibilities to ensure grantees can account for Federal funds appropriately. This information collection is authorized by 42 U.S.C. 12582(b)(10), (13); 2 CFR § 200.206(b).

AmeriCorps collects the information electronically through forms in its online grant management system, through which organizations apply for grant funding.

If this collection is not conducted or is conducted less frequently, then AmeriCorps would be unable to assess the risks posed by providing Federal funding to the applicant organizations.

2. Use of the Information.

AmeriCorps uses the information provided in its pre-award risk assessment of applicants for grant funding.

The beginning-to-end experience for the respondent to complete the information collection activity is straightforward and learning costs are expected to be minimal, as the information is provided through an online form. No psychological costs are expected to be associated with this information collection as individuals will be responding on behalf of the applicant organizations.

3. <u>Use of Information Technology</u>.

AmeriCorps solicits and accepts applicants' responses to the information collection electronically via an online form. In the future, the form will be incorporated into AmeriCorps' secure online grants management system (eGrants replacement).

4. Non-duplication.

There are no other sources of information by which AmeriCorps can obtain this information, which supplements information available in OMBdesignated repositories of governmentwide data, to assess the operational and financial management risks at the point in time when the organization applies for funding.

5. Burden on Small Business.

This information collection does not impact small businesses because they are not eligible for grants; however, AmeriCorps has worked to minimize burden on respondents.

6. <u>Less Frequent Collection</u>.

If the collection is not conducted or is conducted less frequently, AmeriCorps would be unable to assess the risks of providing funding to applicants based on operational and financial management information.

7. Paperwork Reduction Act Guidelines.

There are no special circumstances that would require the collection of information in ways that conflict with the Paperwork Reduction Act guidelines.

8. Consultation and Public Comments.

The 60-day Notice soliciting comments was published on May 9, 2024 at 89 Fed. Reg. 39604.

The comment deadline was July 8, 2024. No comments were received. The 30-day Notice was published on September 4, 2024, at 89 Fed. Reg. 71893.

Additionally, AmeriCorps consulted several staff, including Senior Grant Review Specialists and Portfolio and Compliance Analysts, who had no recommendations on the availability of data, the frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported. AmeriCorps also solicited feedback from the nine most recent respondents of the Operational and Financial Management Survey for input on these items but received no responses. Therefore, no changes were made as a result of this outreach.

9. Gifts or Payment.

There are no payments or gifts to respondents associated with this information collection.

10. Privacy & Confidentiality.

No assurance of confidentiality is provided to respondents. This information collection does not involve the submission of proprietary trade secrets, other confidential information, or personally identifiable information.

11. Sensitive Questions.

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

12. Burden Estimate.

AmeriCorps estimates approximately 1,500 respondents will respond to this information collection each year, as that is the approximate number of new applicant organizations that may apply. AmeriCorps reached this estimate by examining the number of surveys submitted in past years. While the number of surveys has been decreasing somewhat in the most recent years (i.e., there were approximately 1,000 filed in 2023), AmeriCorps is retaining the 1,500 estimate as a long-term annual average. The frequency of response is once, with the application for grant funding. The estimate hour burden per response is 2 hours.

No changes to the approved number of burden hours or frequency are requested, but an adjustment has been made to the estimated cost burden to account for the increase in GS hourly rate since the last estimate in 2021.

Requeste	Program	Program	Change	Chang	Previou
d	Change	Change	Due to	e Due	sly
	Due to	Due to	Adjustme	to	Approv
	New	Agency	nt in	Potent	ed
	Statute	Discretio	Agency	ial	

			n	Estimate	Violati on of the PRA	
Annual Number of Responses for this IC	1,500	0	0	0	0	1,500
Annual IC Time Burden (Hour)	3,000	0	0	0	0	3,000
Annual IC Cost Burden (Dollars)		0	0	20,460	0	172,560

The estimated cost per hour is based on the Office of Personnel Management (OPM) General Schedule (GS) hourly rate of \$47.22 for a GS-12, step 5, employee (for calendar year 2024 for the rest of the U.S.) plus the 36.25% civilian personnel full fringe benefit rate from OMB memorandum M-08-13 (\$47.22 + \$17.12= \$64.34, rounded to the nearest dollar, or \$128.68 per response).

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	2 hours	2	128.68
Record Keeping			
Third Party Disclosure			
Total		2	128.68

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	3,000	193,020
Record Keeping		
Third Party Disclosure		
Total	3,000	193,020

13. Estimated nonrecurring costs.

No capital or start-up costs or operation and maintenance costs are associated with this information collection.

14. Estimated cost to the Government.

There is an estimated annual cost to the Government of approximately \$5,504. This includes the percent of effort (1.2%) of staff required to process the information collection. The information collection is processed in batches, up to 8 times annually. It is estimated that it will take the Government 2,080 hours to review and verify the information contained in each response. This estimate was developed by staff involved in the management of current activity.

Notes: The cost is based on the OPM GS hourly rate of \$51.39 for three GS-12, step 8, employees and an hourly rate of \$66.36 for one GS-14, step 5 (for calendar year 2024) times the percent of effort (1.2%) required to complete the information collection for each batch of responses totaling 1,500.

15. Reasons for changes.

An adjustment has been made to the estimated cost burden to account for the increase in GS hourly rate since the last estimate in 2021.

16. Publicizing Results.

Results of the responses will not be published.

17. OMB Not to Display Approval.

The expiration date for OMB approval will be displayed.

18. Exceptions to "Certification for Paperwork Reduction Submissions."

No exceptions to the certification statement are requested.

19. <u>Surveys</u>, <u>Censuses</u>, and <u>Other Collections that Employ Statistical Methods</u>.

No surveys using statistical methods (such as sampling, imputation, or other statistical estimation techniques) are included; Supporting Statement B is not required.