

**SUPPORTING STATEMENT A: JUSTIFICATION**

1. The OMB Circular at 2 C.F.R. part 200 (“Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” or “OMB Super Circular”) requires Federal awarding agencies to establish conflicts of interest policies for Federal awards. According to 2 C.F.R. 200.112, non-Federal entities receiving federal awards must disclose in writing any potential conflict of interest to the Federal awarding agency. In addition, acts such as 31 U.S.C. 1352 on Lobbying, the Drug Free Workplace Act of 1988 and 22 CFR 1008, Executive Order 13224 on Drugtrafficking, laws on non-discrimination and Title XVII of the National Defense Authorization Act require the awardees to certify compliance prior to receiving a federal award. Also, the IAF Terms and Conditions to each Grant Agreement requires grantees to abide by these laws and disclose any actual or potential conflicts.
2. The IAF’s information collection is required to fulfill the requirements of the OMB Super Circular and other Federal laws, protect the government’s interests at grant award, and ensure this protection extends throughout the performance of the grant period. The Conflict of Interest Disclosure Form is solely used by IAF grantees who have conflicts of interest to disclose. The IAF’s Office of the General Counsel (OGC) will use this information to evaluate actual and/or perceived conflicts and to determine the appropriate action necessary to avoid, sufficiently mitigate, or neutralize the disclosed conflict.
3. The Certifications and Conflict of Interest Disclosure Forms are sent to the grantee electronically as part of their Grant Agreement. The grantee has the option of submitting the form to the agency electronically via email or through regular mail.
4. The information collected is not duplicated elsewhere. The information is not already available in any other electronic form and would not be requested by another federal agency or grant-making institution since it is applicable solely to IAF’s mission.
5. Clear design of the Certifications and Conflict of Interest Disclosure Form and clearly-written instructions reduce the time respondents need to complete the form. Also, because IAF grantees are mostly international organizations, the Grant Agreement which includes the Disclosure Form has been translated into the grantee’s respective languages (Spanish, Portuguese, French, or Haitian Creole) for their convenience.
6. If the IAF did not collect the information required on the Certifications and Conflict of Interest Disclosure Form, obtained it less frequently, or only obtained it from some IAF grantees but not others, the Agency would be harmed because the IAF (through its OGC) could not adequately assess and address an IAF grantee’s ability to use federal funds in a manner that complies with federal laws and free from any actual and/or perceived conflicts of interest, which in turn, could compromise the nature of the grant.

7. It is unlikely that the IAF would cause an ICR to be conducted in such manners as prescribed. If a potential conflict of interest (actual or perceived) is identified, the IAF may ask a grantee to provide OGC with additional information such as a copy of its bylaws and/or any law applicable law or regulation of its jurisdiction, in order to accurately assess (1) whether a conflict of interest is present and (2) determined how best to avoid, sufficiently mitigate or neutralize the conflict.
8. The first Federal Register Notice was published on June 18, 2024 (89 FR 51546). The agency received a public comment and made no edits. The second Federal Register Notice was published on August 23, 2024 (89 FR 68185).
9. The IAF would not be providing any payment or gift to respondents.
10. Assurance of confidentiality is provided under the terms of the Privacy Act of 1974. IAF's OGC reviews the Conflict of Interest Disclosure Form.
11. There are no questions of a sensitive nature on the Disclosure Form.
- 12.

| <i>Type of Respondent</i> | <i>Number of Respondents per year</i> | <i>Average # of burden hours per form</i> | <i>Total Hours</i> | <i>Average Hourly Wage</i> | <b>TOTALS</b> |
|---------------------------|---------------------------------------|---|--------------------|----------------------------|---------------|
| <i>IAF Grantee</i>        | 450                                   | .2  | 90                 | \$15.62                    | \$1404        |

The estimated burden of collecting this information is as follows:

450 respondents  
 x 1 per respondent  
 =450 total annual responses  
 x (.2 hours per average respondent)  
 =90 respondent hours  
x \$15.62/hour for personnel, record-keeping, overhead  
 \$1,404 total cost to respondents

Respondents only complete the form once per grant proposal.

The average hourly wage of \$15.62 was based on the grantees' budgets submitted to the IAF as part of the Grant Agreement package using the average salary for a project director at \$43,000 and the average salary for an administrative assistant at \$22,000.

13. There are no additional costs to the respondents or recordkeepers resulting from this information collection.

14.

| <i>Review</i> | <i>Estimated # of forms presented each year</i> | <i>Average # of review hours per form</i> | <i>Total Hours</i> | <i>Average Hourly Wage</i> | <b>TOTALS</b> |
|---------------|---|---|--------------------|----------------------------|---------------|
| <b>TOTALS</b> | 450   | .08                                       | 36                 | \$47.53                    | \$1,711       |

The estimated annualized cost to the Federal government is as follows:

450 respondents  
 x 1 per respondent  
 =450 total annual responses  
 x .08 hours to review one response  
 =36 total federal hours  
 x \$45.14 GS-12/1 (DCB) hourly wage  
 \$1,711 total cost to respondents

15. The total annual burden is an increase from the previously claimed burden because this form adds certifications for various federal laws in addition to the conflict of interest disclosure form. For this reason all grantees, which is approximately 450 annually, will fill out this form regardless of whether the grantee has a conflict to disclose. The previously claimed burden only estimated that 10 grantees would need to disclose a conflict of interest.

16. The results will not be published.

17. The IAF will display the OMB expiration date on each form.

18. The IAF is not seeking an exception to the certification statement.

**SUPPORTING STATEMENT B: COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.**

*This supporting statement does not contain any collection of information requirements that employ statistical methods.*