

Administration for Children and Families Uniform Project Description (UPD)

**OMB Information Collection Request
0970 - 0139**

Supporting Statement Part A - Justification

Updated November 2024

Submitted By:
Administration for Children and Families
U.S. Department of Health and Human Services

Summary

This a nonsubstantive change request for the Administration for Children and Families (ACF) Uniform Project Description (UPD), which is standard language used to collect application information in response to Notices of Funding Opportunities (NOFOs). This request is to increase the number of NOFOs using the alternate (simplified) version of the UPD previously approved as a pilot in 2023 and to simultaneously decrease the number of NOFOs using the traditional version of the UPD. Additionally, this request also includes additional edits to the language in both versions for clarification and plain language purposes.

1. Circumstances Making the Collection of Information Necessary

The Uniform Project Description (UPD) includes standard language and sections available for use by Administration for Children and Families (ACF) program offices to solicit the required project description and project budget information from applicants for specific funding opportunities. Applications are required for project grants and cooperative agreements as prescribed by HHS regulations 45 CFR § 75.203. The UPD provides a selection of text options for the program offices to choose from, which are used to communicate the application requirements for a specific grant or cooperative agreement notice of funding opportunity (NOFO), as required by 45 C.F.R. § 75.203, and Appendix I to Part 75 – Full Text of Notice of Funding Opportunity.

The UPD is fundamental to ACF's competitive award process. It ensures the provision of adequate information to support award decisions. The ability to select the appropriate standard language for a given NOFO reduces the burden of application preparation, by eliminating unnecessary portions of the application for a given announcement. In addition, it provides for consistency and objectivity in the application and review processes required by 45 C.F.R. § 75.204. Attachment A includes relevant excerpts from 45 CFR 75.

In 2023 ACF began piloting an alternate (streamlined) version of the UPD, as approved under this OMB number. At this time ACF is requesting to increase the use of the alternate version of the UPD, which is streamlined in the following ways:

- Rearranged sections to provide a better flow and clearly delineate between portions that require a narrative, attachments, and other types of submissions, such as notices of intent.
- Applied plain language principles to the content.

ACF proposes to increase the use of the streamlined UPD from 25 NOFOs to approximately 50 NOFOs. Other NOFOs will continue to use the full UPD, but burden estimates have been updated to reflect fewer NOFOs using the full version. Additionally, we propose additional revisions as described here:

- We have changed no requirements. The revisions are to improve flow and readability only. We expect no increase in burden, but have adjusted burden estimates for the streamlined version based on experiences to date.
- For both versions, we moved the highly detailed budget and budget justification section

to the web in line with the streamlined UPD. Additional edits were made to this section in both versions to reflect updated citations to the recently updated 2 CFR 200 and HHS's implementation of that regulation. Moving the detail for preparing a line-item budget and justification ensures that the information is easily accessible for those not familiar with the process while ensuring consistent instruction across all NOFOs.

The full UPD is included as Attachment B. The streamlined UPD is included as Attachment B-Alt. A list of ACF statutorily mandated programs is provided as Attachment C.

2. Purpose and Use of the Information Collection

ACF program offices, grants management officials, and expert non-federal and federal panel reviewers use the information provided through grant applications to select and award discretionary grants and cooperative agreements. Program offices use the information to ensure the Congressional intent of the authorizing legislation will be implemented through funded grant projects, and that applicant entities are eligible to receive grant funds.

Expert non-federal and federal objective review panelists score the information provided in applications as they evaluate applications in the context of the NOFOs' published criteria to ensure that the best proposed projects are funded.

Grants management officials use the information collected to ensure appropriate federal stewardship of federal grant funds. This includes review of compliance audits, information provided by OMB-designated websites, and, when available, certifications by a Certified Public Accountant that appropriate financial systems are in place and that proposed budgeted project costs are allowable, allocable and reasonable.

3. Use of Improved Information Technology and Burden Reduction

In October 2011 (FY 2012), ACF published a notice in the *Federal Register* (76 Fed. Reg. 6671) requiring electronic submission of grant applications for discretionary NOFOs through [the OMB-designated website, Grants.gov](http://www.Grants.gov)¹. The electronic grant application submission process reduces the time and financial burden to the applicant, making the application process more efficient by eliminating delays and costs inherent in a paper-based manual process.

The electronic grant application process involves four functions. First, an interested party uses the *Search Grants* function at Grants.gov to identify a particular public assistance funding opportunity. Second, the application package is downloaded under *Applicants* at Grants.gov. Next, the applicant prepares the application package off-line, or using the Grants.gov *Workspace*, and submits the application package electronically. During this step, the applicant follows the instructions found in the UPD, which is found in *the Project*

¹ Electronic application submission through Grants.gov is required per 2 CFR Part 200 at 45 CFR Part 75, § 75.206.

Description or Project Narrative section of the NOFOs. Last, Grants.gov allows the applicant to track the status of the submitted application using *Track Your Application*.

4. Efforts to Identify Duplication and Use of Similar Information

This is not applicable. Competitive applications are funding opportunity and applicant specific. The UPD provides a common way in which this information is collected to avoid duplicative efforts.

5. Impact on Small Businesses or Other Small Entities

The information requested is selected from the available text options in the UPD and assures the minimum amount needed to comply with program requirements. It cannot be reduced for small entities.

6. Consequences of Collecting the Information Less Frequently

Information is submitted once by applicants, in response to a NOFO. NOFOs are issued by ACF annually. If this information is not collected, ACF program offices will not have adequate data to evaluate the proposed projects and select the appropriate recipients. Reduced frequency is not possible as the annual frequency to solicit applications and make grant awards coincides with the annual appropriation of funds by Congress. Furthermore, not collecting applications for competitive projects would be inconsistent with Departmental policy and other authorities.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Proprietary trade secrets or other confidential information are addressed at element 10 with excerpts from the HHS Grants Policy Statement.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review for the revision of this information collection activity. This notice was published on August 23, 2022, Volume 87, Number 162, page 51676 and provided a sixty-day period for public comment. No comments were received during the notice and comment period.

The active pool of ACF discretionary grantees includes approximately 3,000 State, Local or

Tribal Governments, nonprofit and for-profit organizations, and institutions of higher education.

Because the grant establishes a relationship between ACF, applicants, and recipients, consultation with the community is a necessary and ongoing process. Through this relationship, feedback from applicants and recipients on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, reporting format, and the data elements to be recorded, disclosed or reported is routinely obtained. This typically occurs through routine inquiries, pre- and post-award activities, grant closeout, and through continuous dialogue between ACF and applicants and grantees.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts to applicants. The only remuneration is the grant payment dispersed to those entities awarded a grant or cooperative agreement.

10. Assurance of Confidentiality Provided to Respondents

Assurances of confidentiality necessary to inform the applicant of project grants and cooperative agreements are located in three specific places, Grants.gov, GrantSolutions.gov (grants management system), and in HHS policy, which is incorporated in the HHS Grants Policy Statement (HHS GPS).

In obtaining a recipient user account, GrantSolutions.gov requires submission of a formal request form that includes a US Government Data Access Request/Security Compliance Statement and the HHS Rules of Behavior for Use of HHS Information Resources.

The HHS GPS provides the consolidated terms and conditions for HHS discretionary awards, including requirements for submitting applications in response to HHS notices of funding opportunities.

Privacy information can be found in the following locations:

- Grants.gov: <https://www.grants.gov/privacy-policy>
- GrantsSolutions.gov: <https://www.hhs.gov/web/policies-and-standards/hhs-web-policies/privacy/index.html>
- HHS Grants Policy Statement: <https://www.hhs.gov/sites/default/files/hhs-grants-policy-statement-october-2024.pdf>
 - o See page Appendix D: HHS Administrative and National Policy Requirements, *Privacy Act*

NOTE: Upon receiving paper-format applications, ACF scans the documents into .PDF format and attaches them to the appropriate Grantsolutions.gov file, after which the original copies are destroyed.

11. Justification for Sensitive Questions

Questions of a sensitive nature are not asked.

12. Estimates of Annualized Burden Hours and Costs

This request is to continue to use the UPD for 42 statutorily mandated ACF programs for project grants and cooperative agreements.

Based on previous experience with applications in response to ACF NOFOs, we estimate an average of 3,218 applications will be submitted annually. In FY 2024, ACF piloted a streamlined version of the UPD with 25 NOFOs in coordination with HHS's SimplerGrants, SimplerNOFOs Initiative. We now propose to increase use of the streamlined version, which has been received well by programs and applicants. We plan to use the simplified version with up to 50 NOFOs in FY 2025. Burden estimates have been updated to reflect more respondents to the streamlined version and fewer to the traditional version.

Our previous estimates of the average the burden hours per response of a NOFO using the traditional UPD was 60 hours. However, through the SimplerNOFO Pilot Evaluation, applicants self-reported spending 66.1 hours on the NOFOs with the traditional UPD in FY 2024 while the NOFOs with the simplified UPD showed a decrease in application time to 57.9 hours. Burden estimates have been updated to reflect this feedback. The frequency is once, when the applications are solicited through the NOFO.

Information Collection Title	Annual Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Uniform Project Description (UPD)	546	1	66	36,036	\$56.72	\$2,043,962
Streamlined Uniform Project Description (UPD)	2,672	1	57.9	154,709	\$56.72	\$8,775,094
Totals:				190,745		\$10,819,056

The respondents to the UPD include a variety of program and administrative staff at the applicant organizations. As such, we have based the estimated annualized cost using the wage rate for Community and Social Service Occupations (Bureau of Labor Statistics Occupational Employment and Wage Statistics Job Code 21-0000²). The mean hourly wage is \$28.36. To account for fringe benefits and overhead the rate was multiplied by two which is \$56.72.

² <https://www.bls.gov/oes/current/oes210000.htm>

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no direct (incremental) monetary costs to respondents other than their time to prepare the applications.

14. Annualized Cost to the Federal Government

The competitive merit review is performed by non-federal reviewers and/or federal reviewers, which incurs costs to the Federal Government with, or without, the UPD. The UPD reduces the amount of time for federal employees to develop NOFOs, and therefore provides a savings to the federal government. It is estimated that, on average, there are 40 hours of labor on the part of government employees to develop the NOFO. The average annual number of applications is 3,218, which equates to 128,720 hours of staff time. Based on an average of \$55 per hour, in monetary terms this equates to \$7,079,600.

15. Explanation for Program Changes or Adjustments

This nonsubstantive change request is to increase the number of NOFOs using the streamlined version of the UPD. Burden estimates based on evaluation of the SimplerNOFO Pilot of the streamlined UPD has shown a decrease in burden hours resulting in an overall reduction in burden and costs to respondents. The feedback also provided a more accurate estimate for the traditional UPD and estimates have been updated to reflect this.

Additionally, this non-substantive change request includes:

- Updates to language impacted by the recent updates to 2 CFR 200 and HHS's implementation of that regulation
- Additional updates to provide better flow and additional plain language principles.
- Moving the highly detailed budget and budget justification section within the traditional UPD to the web in line with the streamlined UPD.

The burden has been updated to reflect the currently estimated number of applications in FY2023-2026.

16. Plans for Tabulation and Publication and Project Time Schedule

Information in grant applications will not be published. The disclosure of information in grant applications is regulated by, and subject to, The Freedom of Information Act (FOIA) and The Privacy Act of 1974.

The most significant exemptions from disclosure of grant application information are 4 and 5 in the FOIA. Exemption 4 protects from public disclosure of two types of information: trade secrets and commercial or financial information obtained that is privileged or confidential. Exemption 5 applies to internal government documents and permits the withholding of internal recommendations, advisory opinions, and materials used for evaluation.

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

There will be no exceptions to the practice of displaying the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.