

**Supporting Statement
Data Collection Form for
Disclosure of Lobbying Activities (SF-LLL) form and
Certification Regarding Lobbying form
4040-0013**

The Disclosure of Lobbying Activities (SF-LLL) is part of an OMB-approved collection (4040-0013). The Certification Regarding Lobbying form is a supplementary form used to collect additional lobbying data from grant applicants. These forms will be utilized by 51 federal grant-making agencies, and additional grant-making entities. This information collection expired on February 28, 2025. Grants.gov is requesting a three-year reinstatement without change of this information collection and a three-year clearance.

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, and by Federal grants management staff to evaluate applicants for Federal financial assistance.

3. Improved Information Technology

Federal awarding agencies have the option of allowing recipients to use electronic submission of alternate forms. Although agencies can allow recipients

to submit electronically, or via other forms, they are only approved 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

The proposed collection of information will be conducted in a manner that complies with relevant legislation authorizing Federal grants programs, OMB policies related to the administration of Federal grants including OMB Circulars A-102, A-110 (relocated to Relocated to 2 CFR 215), A-21 (relocated to 2 CFR 220), A-87 (relocated to 2 CFR 225), and A-122 (relocated to 2 CFR 230), and guidelines of 5 CFR 1320.5(d)(2).

8. Federal Register Notice/Outside Consultation

The Grants.gov Program Management Office managed by HHS published the current Application for Federal Financial Assistance form collection for public comment in the *Federal Register* for 60-day comment on November 27, 2024 (89 FR 93615). 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.

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.

11. Sensitive Questions

Not applicable since there are no sensitive questions.

12. Burden Estimate

As these are Common Forms, 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 12675 submissions of the SF-LLL and 3952 Certification Regarding Lobbying form. HHS estimates that it takes applicants

approximately 1 hour on average to complete the SF-LLL and 0.5 hours on average to complete the Certification Regarding Lobbying form. Cumulatively, HHS reports that the total burden to applicants to be 14651 burden hours annually for the SF-LLL and Certification Regarding Lobbying forms.

Section A. Estimated Annualized Burden Hours to Respondents

Disclosure of Lobbying Activities (SF-LLL) and Certification Regarding Lobbying Forms Estimated Annualized Burden to Respondents

Form	Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden on Respondent per Response in Hours	Total Burden Hours
SF-LLL	12675	1	12675	1	12675
Certification Regarding Lobbying	3952		3952	0.5	1976
TOTAL	16627	1	16627	1.5	14651

Section B. Burden Cost

Certification Regarding Lobbying Form Estimated Annualized Cost to Respondents

Cost To Respondents				
Form	Type of Respondent	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
SF-LLL	Grant Writer	\$30	12675	\$380,250
Certification Regarding Lobbying	Grant Writer	\$30	1976	\$59,280
TOTAL			14651	\$439,530

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 \$439,530.

13. Capital Costs

There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the SF-LLL and the Certification Regarding Lobbying forms.

14. Cost to the Federal Government

There is no projected incremental increase in the cost burden to the Federal Government with the implementation of the SF-LLL and the Certification Regarding Lobbying 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 Certification Regarding Lobbying Form, and therefore its use is not expected to alter annualized Federal costs.

Form	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
SF-LLL	12675	1	12675	\$49	\$621,075
Certification Regarding Lobbying	3952	0.5	1976	\$49	\$96,824
TOTAL					\$717,899

Agency personnel time to review the SF-LLL form is estimated at 1 hour per form. Based on 12675 responses per year, then 12675 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, 12675 hours x \$49 = \$621,075 of estimated annual cost to the federal government to review the form. Agency personnel time to review the Certification Regarding Lobbying form is estimated at 0.5 hour per form. Based on 3952 responses per year, then 1976 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, 1976 hours x \$49 = \$96824 of estimated annual cost to the federal government to review the form. The total cost to the government for 4040-0013 is \$717899.

15. Program or Burden Change

The burden hours reflected in this ICR remain unchanged at 12,675 hours since the last ICR in 2018.

16. Publication and Tabulation Dates

There are no publication plans for collected data including summarizing or tabulating by Grants.gov.

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.