

OMB CONTROL NUMBER	TITLE	OIRA COMMENTS	Grants.Gov Response to OIRA Comments	OFFM comments	Grants.gov Response to OFFM Comments
4040-0013	SF-LLL Disclosure of Lobbying Activities	1. Q15 of SSA still has redlines embedded 2. How was the LLL only 1,000 responses in the previous collection which covered government-wide use and now there is a requested 8,399 hours JUST for HHS? 3. Why is there a program change of \$251,640 in cost if nothing new is being required?	1. Content has been edited. Please revalidate. 2. Previous clearance was done by OMB. Unknown why 1,000 was used. New Data call yielded 8399. 3. New clearance record in ROCIS is based on copying and editing previous renewal. Therefore, any new calculations are based on figures entered into old clearance.	1. No comment other than there are at least 28 Federal awarding agencies now who may use this form.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation.
4040-0002	SF-424 Mandatory (M)	1. Previous instruments were uploaded specific to the using agency. Is it understood by all agencies that the only one that is appropriate for use under the common form is the modified one by HHS? 2. Change in burden due to program agency violation in the burden statement chart does not seem correct. 3. Why is there a program change of \$251,640 in cost if nothing new is being required?	1. Yes. 2. New clearance record in ROCIS is based on copying and editing previous renewal. Therefore, any new calculations are based on figures entered into old clearance. 3. New clearance record in ROCIS is based on copying and editing previous renewal. Therefore, any new calculations are based on figures entered into old clearance.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now. 1. I don't understand this SS, it states that the form is changing do to FFATA in the body of the document, but at the top it simply states that it's making the FAX # optional.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation. 1. Corrected.
4040-0006	SF-424 A Budget Information-Non Construction	1. Why is Q12 of SSA not reflecting use of the common form model? The current numbers reflect government-wide use vs. HHS use. 2. The burden table also reflects the government-wide burden vs. HHS use.	1. Language in SS has been corrected and standardized for HHS use only. 2. Language in burden table has been corrected for HHS use only.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now. 2. 1 hour to complete application seems low, my understanding of burden is that it's more than the time it takes to complete form.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation. 2. 1 Hour has been the standard used for the past renewals and this number is conservative. The form is complex and requires the entry of financial data for multiple budget periods.
4040-0003	SF-424 Short Organizational (Short)	1. Q12 of SSA has incorrect cumulative total burden. Should be 4,194 and not 4,884. 2. Previous instruments were uploaded specific to the using agency. Is it understood by all agencies that the only one that is appropriate for use under the common form is the modified one by HHS?	1. Corrected. 2. Renewal in ROCIS has removed all of the non-HHS agencies' instruments. It is understood by all agencies that this is a common form.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of

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		3. Can Grants.gov explain the change due to PRA violation and agency discretion- specifically from 10,697 to 8,388?	2. Methodology for collection of SF-424 for previous renewal was unknown as previous GG staff have left. HHS Data call has for current renewal yielded 8388.		Grants Policy, Oversight, and Evaluation.
4040-0012	SF-270 Request for Advance or Reimbursement	1. How is that the government-wide burden was 100,000 previously and now it is 100,000 just for HHS? 2. If nothing was changed in the document, why was the previous removed and a modified instrument replaced it? 3. Why is there a program change of \$3M in cost if nothing new is being required?	1. Methodology for collection of SF-270 for previous renewal was unknown as previous OMB staff have left. Therefore, GG is renewing based on 100000 until methodology can be ascertained. 2. Same instrument is being used. 3. Needs to be corrected in ROCIS.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation.
4040-0007	SF-424 B Assurances- Non Construction Programs	1. Previous instruments were uploaded specific to the using agency. Is it understood by all agencies that the only one that is appropriate for use under the common form is the modified one by HHS? 2. How was the previous government-wide burden 33,839 and HHS individually is 40,000?	1. Renewal in ROCIS has removed all of the non-HHS agencies' instruments. It is understood by all agencies that this is a common form. 2. Methodology for collection of SF-424 for previous renewal was unknown as previous GG staff have left. HHS Data call has estimated 40000.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation.
4040-0011	SF-271: Outlay Report and Request for Reimbursement for Construction Programs	1. How is that the government-wide burden was 40,000 previously and now it is 40,000 just for HHS? 2. Why is there a program change of \$1.2M in cost if nothing new is being required?	1. Methodology for collection of SF-271 for previous renewal was unknown as previous GG staff have left. HHS Data call has estimated 40000. 2. New clearance record in ROCIS is based on copying and editing previous renewal. Therefore, any new calculations are based on figures entered into old clearance.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now. 2. 40,000 seems high, HHS only receives 1,254 applications for construction programs according to the SF-424 C SS.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation. 2. This is based on previous numbers recorded by OMB. Numbers will be verified.
4040-0016	SF-429 Real Property Status Report	1. Please upload non redlined SS 2. Can Grants.gov explain the change due to PRA violation and agency discretion- specifically from 5,485 to 94,515? 3. Why is there a program change of \$3M in cost if nothing new is being required?	Updated 2-4. Methodology for collection of SF-429 for previous renewal was done by GSA staff who have since left. This renewal is created in ROCIS based on previous renewal. HHS data call has yielded numbers and calculations presented	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation. 2. This is based on previous numbers recorded by OMB. Numbers will be verified.

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		4. Why is the HHS burden of 100,000 so much higher than what the previous govt-wide burden was?	presented.	2. 100,000 seems way to high, there are very few grants to which this form would be collected.	
4040-0014	SF-425 Federal Financial Report	1. Please uploade non redlined SS 2. Why is there a program change of \$3M in cost if nothing new is being required? 3. How was the change in burden for government-wide go from 5,485 to 100,000 (just HHS)?	Updated 2-3. Methodology for collection of SF-425 for previous renewal was done by OMB staff who have since left. This renewal is created in ROCIS based on previous renewal. HHS data call has yielded numbers and calculations presented.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now. 2. Previous burden estimate seems low.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation. 2. This is an approximate number provided by PMS, Grantsolutions, HRSA, and NIH. Number can be reveified through data call. This clearance only needs to report for HHS and not for all Federal agencies.
4040-0008	SF-424 C Budget Information - Construction Programs	1. Previous instruments were uploaded specific to the using agency. Is it understood by all agencies that the only one that is appropriate for use under the common form is the modified one by HHS?	1. Renewal in ROCIS has removed all of the non-HHS agencies' instruments. It is understood by all agencies that this is a common form.	1. SS references outdated OMB circulars, this should be updated as appropriate to conform to the Uniform Guidance. Also, there are at least 28 Federal awarding agencies now. 2. 1 hr seems like a low estimate to gather all the information required to complete the form and 40 minutes seems to be a low estimate to review this form.	1. Per discussion with OMB OFFM, wording has been changed in all SS to refer to "26 Federal agencies and additional grant-making entities." Policies have been updated with assistance from HHS Office of Grants Policy, Oversight, and Evaluation. 2. These estimates have been historically used and approved in previous clearances.