# Supporting Statement Data Collection Form for SF-270 Request for Advance or Reimbursement Form 4040-0012

The SF-270 Request for Advance or Reimbursement form is an information collection approved by the OMB under control number 4040-0012. Grants.gov is requesting an extension, without change of a currently approved collection as a Common Form. This form will be utilized by 51 federal grant-making agencies, and additional grant-making entities. This information collection expired on January 31, 2025. Grants.gov is seeking 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 SF-270 Request for Advance or Reimbursement Form 4040-0012 is used to request funds for all grant programs when letters of credit or predetermined advance methods are not used. The Federal awarding agencies and OMB use information reported on this form for general management of the Federal assistance awards programs.

#### 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

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards establish the requirements fulfilled by this form.

#### 8. Federal Register Notice/Outside Consultation

The Grants.gov Program Management Office, managed by HHS, published the current form for public comment in the Federal Register for 60-day comment period on November 27, 2024 (88 FR 93613). 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. This will be kept private to the extent allowed by law. 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.

#### 11. Sensitive Questions

Not applicable since there are no sensitive questions.

#### 12. Burden Estimate

#### Section A. Estimated Annualized Burden Hours to Respondents

As this is a Common Form, burden is reported only for HHS. Agencies may elect to use the form for future use. Agencies electing future use of the form will be added through a change request. All agencies with grant programs that award grants to organizations are eligible to use this form.

HHS received 100,000 submissions in FY2013 and estimate that it takes applicants approximately one hour on average to complete this form. Cumulatively, these organizations report the total burden to applicants to be 100,000 hours.

SF-270 Request for Advance or Reimbursement Form 4040-0012 Annualized Burden to Respondents

AGENCY	SF- SF-270 Request for Advance or Reimbursem ent	Number of Responses per Respondent	Total Annual Respons es	in Hours	Total Burd en Hour s
HHS	100,000	1	100,000	1	100,000
TOTAL	100,000		100,000		100,000

#### Section B. Burden Cost

# SF-270 Request for Advance or Reimbursement Form 4040-0012 Estimated Annualized Cost to Respondents

Cost To Respondents							
AGENCY	Type of Respondent	Hourly Wage Rate		Total Burden Hours	Tota	Total Respondent Cost	
HHS	Grant Writer	\$	30.00	100,000	\$	3,000,000	
	TOTAL			100,000	\$	3,000,000	

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 \$3,000,000.

#### 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-270 Request for Advance or Reimbursement form.

#### 14. Cost to the Federal Government

There is no projected incremental increase in the cost burden to the Federal Government. Each agency currently has existing personnel, systems, and processes (or other resources) in place to receive and review their agency-specific grant applications. Any additional cost for agency system development, maintenance and enhancements should not be attributed to use of the SF-270 Request for Advance or Reimbursement form, and therefore its use is not expected to alter annualized Federal costs.

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
100,000	1	100,000	\$49.00	4,900,000

Agency personnel time to review the form is estimated at 1 hours per form. Based on 100,000 responses per year, then 100,000 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, 100,000 hours x \$49 = \$4,900,000 of estimated annual cost to the federal government to review the form.

#### 15. Program or Burden Changes

Not applicable as there were no program nor burden changes.

#### 16. Publication and Tabulation Dates

Not applicable since there are no publication plans.

#### 17. Expiration Date

Not applicable since the OMB number will be included on the data collection form.

#### 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.