

## SUPPORTING STATEMENT - PART A

### Pool Safely Grant Program

#### OMB Control Number

#### 1. Need for the Information Collection

The U.S. Consumer Product Safety Commission (CPSC or Commission) urges state, local, and tribal governments to apply for up to \$3.0 million in grant funding for the Pool Safely Grant Program (PSGP or grant program). The two-year grants are to be used to reduce deaths and injuries from drowning and drain entrapment incidents in pools and spas. The PSGP is an essential part of CPSC's national campaign to prevent drowning and drain entrapment. Drowning is one of the leading causes of death among young children.<sup>1</sup>

The grant program is authorized through the Virginia Graeme Baker Pool and Spa Safety Act (VGB Act). Since 2016, CPSC has provided more than \$7.7 million in Pool Safely grants to 35 recipients who have used it for a variety of drowning prevention activities, including to train their pool safety enforcement officials and to run swim safety education programs in their communities.

#### 2. Use of the Information

Grant program applicants must be a state, local government, Indian Tribe, or U.S. Territory that has enacted or amended a law that meets the requirements of VGB Act (15 U.S.C. 8001), sections 1405 and 1406. Prospective applicants can review the solicitation on Grants.gov. All funding opportunities and application kits are made available on Grants.gov. In order to apply electronically you must first have a GrantSolutions user account. This collection makes use of the following common (online) forms, as well as additional attachments specific to PSGP:

- SF-424A Budget Information – Non-Construction (OMB Control No. 4040-0006)
- SF-424B Assurances – Non-Construction Programs (OMB Control No. 4040-0007)
- Project Abstract Summary (OMB Control No. 4040-0019)
- SF-424 Application for Federal Assistance (OMB Control No. 4040-0020)
- SF-LLL Disclosure of Lobbying Activities (OMB Control No. 4040-0013)

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<sup>1</sup> <https://www.cpsc.gov/Newsroom/News-Releases/2024/3-0-Million-Available-in-Pool-Safely-Grants-to-Help-State-Local-and-Tribal-Governments-Prevent-Drownings-and-Drain-Entrapments-Apply-Now>

3. Use of Information Technology

In order to apply for new funding opportunities which are open to the public for competition, applicants must access the Grants.gov website portal. All grant applications must be submitted electronically. Applicants that have a grantee business relationship with a grant program serviced by the Office of Grants Management, that are also applying as part of ongoing grantee related activities, should access GrantSolutions.gov.

4. Non-duplication

The information obtained through this collection is specific and is not readily available for use or adaptation from another source. CPSC will work to identify areas within the information collection where the same information is requested from the applicant in two or more sections of the grant application. Improving the grant application process to reduce applicant burden is an ongoing effort.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

This child safety law has helped reduce the risk of drowning and drain entrapment by requiring public pools and spas to install new safety drain covers, and through federal grants and education programs to encourage states and localities to require residential pools and spas to utilize physical barriers, such as a fence completely surrounding the pool, with self-closing, self-latching gates. Less frequent collection of information used in the PSGP could reduce the effectiveness of federal grants to encourage these life-saving measures.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, March 11, 2025. The 60-Day FRN citation is 90 FRN 11729. CPSC received one comment in support of the collection. The comment is included below.

Agency: Harris County Public Health, Environmental Public Health Division  
Title: Associate Director  
Name: Diane Davis

*As a current Pool Safety Grant Program recipient, it is our opinion that the proposed collection of information is adequate and necessary for the grantor to make a well-informed decision on awardees. It's critical for the Grantor to understand the current community safety needs of the applicants, proposed planned activities to reduce pool-related injuries, illnesses, and deaths, as well as staffing needs to enforce pool safety regulations to allocate the limited funds equitably. The project narrative is necessary to provide an overview of the scope of the project, justifying the need for funding, and allowing previous grantees the opportunity to describe their successes and how the funding helped reduce drowning and drain entrapment. The budget narrative is crucial so that the grantee can provide an outline of how the funding will be spent and to ensure that funding is spent within the guidelines of the grant. Identifying the staff in the staffing plan, assures the grantor that the project will be staffed with the appropriate positions and outlines the duties/descriptions of each position. The indirect cost rate agreement informs the grantee of permissible costs that can be incurred and reimbursement, if the grant is awarded. All of the information that is gathered is necessary to demonstrate the usefulness of the grant, as well how the funds will be applied to achieve the desired outcome.*

*For first-time applicant's, the CPSC's estimated burden for the proposed collection of information is accurate. However, for historical applicants the estimated burden would be decreased significantly as the applicable background information such as staffing model, legal eligibility, indirect cost rate agreement would not fluctuate much from previous applications.*

*It is our opinion that the Notice of Funding Opportunity provides clear concise guidance on the application process. There are adequate details and justifications for each required attachment that facilitates a seamless application process.*

*The current application submittal process through grants.gov is sufficient as it provides transparency of pertinent information and trackability of the status.*

A 30-Day Federal Register Notice for the collection published on Friday, June 13, 2025. The 30-Day FRN citation is 90 FRN 25037.

## Part B: CONSULTATION

Applicants, potential applicants, and awardees can provide feedback on the application process and post-award administration. This is a continuous process. Historically, most of the feedback given to the CPSC has addressed the clarity of instructions and allowed the CPSC to improve its Funding Opportunity Announcements and the pre-award process. Additionally, CPSC has engaged with the Office of Management and Budget (OMB) on how agencies can simplify their grants announcements (NOFOs). This is also a continuous process that will extend to fiscal year 2025.

9. Gifts or Payment

The grant awards will range from \$50,000 to \$400,000 each.

10. Confidentiality

CPSC will perform a privacy threshold analysis for this collection to determine whether a privacy impact assessment or system of records notice is required.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

To apply for the PSGP, an applicant would typically provide 6 attachments, specific to the grant program.

Attachment 1, the project narrative, provides a description of community needs and is estimated to take 20 hours to prepare, on average.

Attachment 2, the budget narrative, presents each federal budget category with an explanation of each line item, as well as providing an estimated cost basis calculation. Cost estimates are based on prior experience delivering similarly scoped projects in addition to cost pricing research. Attachment 2 is estimated to take 10 hours to prepare, on average.

Attachment 3, the schedule, is a multi-year project schedule/timeline, which typically includes a supporting organizational chart. Attachment 3 is estimated to take 6 hours to prepare, on average.

Attachment 4, the staffing plan, is a detailed staffing plan, with a narrative that describes and identifies each program staff member with the amount of time the staff member will participate in grant program funded work. Attachment 4 is estimated to take 6 hours to prepare, on average.

Attachment 5 describes laws that are in effect for residential pools in the region. The attachment includes the relevant code sections which meet the satisfaction of VGB Act requirements from scope of authority, construction requirements, inspection of aquatic facilities, to enforcement of the requirements of the minimum state requirements specified in section 1406 of the VGB Act. Attachment 5 is estimated to take 1 hour to prepare, on average.

Attachment 6, the indirect cost rate agreement, certifies that the award recipient (1) has never received a federally negotiated indirect cost rate for any federal awards, (2) has received less than \$35 million in direct funding for the fiscal year requested, (3) the di

minimum rate approved will be applied to Modified Total Direct Costs regarding salaries, wages, applicable fringe benefits, supplies and other items, (4) the project costs will not be double charged, and (5) the proper use and application of the minimum rate is the responsibility of the award recipient. The certification must be signed and dated. Attachment 6 is estimated to take 1 hour to prepare, on average.

Therefore, to complete attachments 1-6 we estimate it would take the applicant approximately 44 hours to compile these materials. CPSC expects to receive 20 grant applications that utilize the attachments described, for a total burden hour estimate of 880 hours (44 hours per application × 20 applications).

We estimate the compensation for the creation and compilation of Attachments 1-6 is \$62.92 per hour (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” September 2024, total compensation for state and local government workers: [https://www.bls.gov/news.release/archives/ecec\\_12172024.pdf](https://www.bls.gov/news.release/archives/ecec_12172024.pdf)). Therefore, the estimated annual cost of the burden requirements is \$55,370 (\$62.92 per hour × 880 hours = \$55,369.60).

Based on this analysis, the collection of information would impose a total burden to applicants of 880 hours at a cost of \$55,370 for this round of grant funding.

### 13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

### 14. Cost to the Federal Government

Costs to the Federal Government for running the PSGP include labor costs for work done by CPSCs Grants Specialist, Object Review Committee (ORC) and legal staff. The ORC is made up of 3-6 volunteers from CPSC that spend time reviewing the applications. Legal staff review applicant eligibility and budget questions.

The estimated annual cost of the information collection to the Federal Government is approximately \$57,948, which includes 600 staff hours to prepare for the grant program, examine and evaluate the information in the grant applications and award the grants. This is based on a GS-13, step 5 level salaried employee. The average hourly wage rate for a mid-level salaried GS-13 employee in the Washington, DC metropolitan area (effective as of January 2025) is \$65.48 (GS-13, step 5). This represents 67.8 percent of total compensation (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” September 2024, Table 2., percentage of wages and salaries for all civilian management, professional, and related employees: [https://www.bls.gov/news.release/archives/ecec\\_12172024.pdf](https://www.bls.gov/news.release/archives/ecec_12172024.pdf)). Adding an additional 32.2 percent for benefits brings average annual compensation for a mid-level salaried GS-13 employee to \$96.58 per hour. Assuming that approximately 600 hours will be required annually, this results in an annual cost of \$57,948 (\$96.58 per hour × 600 hours = \$57,948).

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

PSGP Awards are posted to the CPSC's website and via press release.<sup>2</sup> Information released includes the awardee name, state, and award amount.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.

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<sup>2</sup> <https://www.cpsc.gov/Newsroom/News-Releases/2025/CPSC-Awards-More-than-2-5-Million-in-Pool-Safely-Grants-to-Ten-State-and-Local-Governments-to-Combat-Pool-and-Spa-Drownings-and-Drain-Entrapments>