SUPPORTING STATEMENT - PART A

Carbon Monoxide Poisoning Prevention Grant Program
OMB Control Number

1. Need for the Information Collection

The U.S. Consumer Product Safety Commission (CPSC or Commission) assists state, local and tribal governments in reducing deaths and injuries from carbon monoxide (CO) poisoning through the Carbon Monoxide Poisoning Prevention Grant Program (COPPGP or grant program). CPSC's grant program is authorized through the Nicholas and Zachary Burt Memorial Carbon Monoxide Poisoning Prevention Act of 2022 to provide eligible state, local, and tribal governments with grants to purchase and install CO alarms in residential homes and dwelling units of low-income families or elderly people and facilities that serve children or the elderly, including childcare centers, public schools and senior centers, and to develop training and public education programs with the goal of preventing CO poisoning.

There are three allowable activities under the COPPGP. They are purchase and installation, training, and public outreach and education. Under the COPPGP, award recipients must allocate their funding to:

- Purchase and install compliant carbon monoxide alarms in the dwelling units of low-income families or elderly individuals, and facilities that commonly serve children or the elderly (including childcare facilities, public schools, and senior centers);
- Develop and disseminate training materials, instructors, and training sessions; or
- Educate the public about—
    i. The risk associated with carbon monoxide as a poison; and
    ii. The importance of proper carbon monoxide alarm use.

CPSC can award up to a total of $2 million in grants through the grant program. Grantees will have two years to use the funding to purchase and install CO alarms and complete training and education efforts.

2. Use of the Information

Grant applicants must be from a state, local government, Indian Tribe or U. S. Territory that has adopted a statute, rule, regulation or similar measure that requires compliant carbon monoxide alarms to be installed in dwelling units in accordance with National Fire Protection Association (NFPA) 72, the International Fire Code (IFC), or the International Residential Code (IRC). Prospective applicants can review the Funding Opportunity Announcement (FOA) on Grants.gov. Grant applicants must have a GrantSolutions user account.

This collection makes use of the following common (online) forms, as well as additional attachments specific to COPPGP:

- 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)

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

The burning of fuels produces CO, which is a colorless, odorless gas. Exposure to unhealthy levels of CO can lead to CO poisoning, a serious health condition that could result in death. Unintentional CO poisoning from motor vehicles and fuel-burning appliances, such as furnaces, water heaters, portable generators, and stoves, annually kill more than 400 individuals. CO alarms save lives and should be installed on every level and outside sleeping areas in residences. Less frequent collection of the information used in the COPPGP 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 11731. One anonymous comment was received and is provided below.

CPSC-2025-0004
This is an important step to take to ensure the grants are issued to the individuals that have been affected by carbon monoxide poisoning and other toxic substances.

A 30-Day Federal Register Notice for the collection published on Friday, June 13, 2025. The 30-Day FRN citation is 90 FRN 25035.

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. This is also a continuous process that will extend to fiscal year 2025.

9. Gifts or Payment

Individual awards range between $50,000 and $400,000. The total anticipated annual available funding is $2 million.

There are three fundable activities (1. purchase and installation, 2. training, and 3. public outreach/ education) for the COPPGP, which collectively count towards the minimum award amount. Payments are generally issued on a reimbursement basis but may include advance payments if permitted in the Notice of Award.

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 COPPGP, applicants should provide justification for the requested funding, including information related to how the funding will be used, what types of activities will be funded, and what the expected benefit or goal is. Details should include what types of facilities or dwellings will be part of the program, who the target audience is, and cost estimates for time and materials. To do this, an applicant would typically provide six attachments specific to the grant program.

Attachment 1, the introduction, provides a table of contents and introduction. The table of contents includes section headers and corresponding page numbers. The introduction aids reviewers in understanding the community that will be helped by the proposed project. The introduction describes the proposed project, also used in the SF-424 set of documents. Attachment 1 is estimated to take 1 hour to prepare, on average.

Attachment 2, legal eligibility, provides citation(s) necessary to support that the applicant meets the legal eligibility requirements. The applicant must document that they have adopted a statute, rule, or similar measure that is comparable to National Fire Protection Association (NFPA) 72, the International Fire Code (IFC), or the International Residential Code (IRC). Attachment 2 is estimated to take 1 hour to prepare, on average.

Attachment 3, the work plan, provides the framework and describes all aspects of the proposed project. It includes the project's goals, objectives, strategies, activities, timeframes assigned for work plan execution during project implementation (including completion dates for each activity), and identifies individuals and organizational representatives responsible for carrying out each work plan activity. It also includes details on how the work might meet the favorable consideration factor. Attachment 3 is estimated to take 40 hours to prepare, on average.

Attachment 4, the budget table, provides a budget narrative and table for the 2-year project schedule including a detailed breakout of costs. The information provided in this section must follow the format provided in the sample budget. In the budget schedule, applicants should include milestones aligned with project goals, an indication of when each milestone will occur, and the person(s) responsible for managing each activity. Attachment 4 is estimated to take 10 hours to prepare, on average.

Attachment 5, cost share, is an additional narrative documenting cost share on the budget. This attachment is not required for tribal organizations. It provides details on how the applicant will contribute non-Federal funds, showing the source and amount of cost share. Attachment 5 is estimated to take 5 hours 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 minimus 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 di minimus 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 58 hours to compile these materials. CPSC expects to receive 35 grant applications that utilize the attachments described, for a total burden hour estimate of 2,030 hours (58 hours per application × 35 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). Therefore, the estimated annual cost of the burden requirements is $127,728 ($62.92 per hour × 2,030 hours = $127,727.60).

Based on this analysis, the collection of information would impose a total burden to applicants of 2,030 hours at a cost of $127,728 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 COPPGP 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). 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

COPPGP Awards are posted to the CPSC's website and via press release.[1] 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.

[1] https://www.cpsc.gov/Newsroom/News-Releases/2024/CPSC-Awards-More-than-3-Million-in-Grants-to-22-State-and-Local-Governments-to-Prevent-Carbon-Monoxide-Poisoning