

## THE SUPPORTING STATEMENT

### A. Justification

#### 1. Circumstances Making the Collection of Information Necessary

The Office of Grants Management (OGM), in the Administration for Children and Families (ACF) is proposing the collection of program performance data for ACF's discretionary grantees. To collect this data OGM has developed a form from the basic template of the OMB-approved reporting format of the Program Performance Report. OGM will use this data to determine if grantees are proceeding in a satisfactory manner in meeting the approved goals and objectives of the project, and if funding should be continued for another budget period.

The requirement for grantees to report on performance is OMB grants policy. Specific citations are contained in: (1) OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments, also known as the "Common Rule" [codified at 45 CFR Part 92] and (2) OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Educations, Hospitals, and Other Non-Profit Organizations [codified at 2 CFR Part 215]. Copies of the relevant OMB Circulars can be found at Attachments A and B, respectively.

#### 2. Purpose and Use of the Information Collection

The Office of Grants Management (OGM) will use this data to determine if grantees are proceeding in a satisfactory manner in meeting the approved goals and objectives of the project, and if funding should be continued for another budget period.

#### 3. Use of Improved Information Technology and Burden Reduction

This form will be made available on the ACF Funding Opportunities web page under Forms. Grantees will be able to download the form, fill it out completely, and send it electronically to OGM, along with other necessary information. Electronic submission of this form will be strongly encouraged but not required. Electronic submission will reduce burden and make the process more efficient by eliminating delays inherent in a paper-based manual process.

#### 4. Efforts to Identify Duplication and Use of Similar Information

The form currently used to collect this information does not provide the details needed to determine if grantees are proceeding in a satisfactory manner in meeting the approved goals and objectives of the project, and if funding should be continued for another budget period. The proposed form provides specifics on the information needed

in order for OGM to make an informed decision on continued funding for grantees. A copy of the form currently used can be found in Attachment C.

#### **5. Impact on Small Businesses or Other Small Entities**

The information requested is the minimum amount needed to comply with program requirements. It cannot be reduced for small entities. No other Federal agency collects the information required to evaluate these unique program criteria.

#### **6. Consequences of Collecting the Information Less Frequently**

If this information is not collected, adequate data will not be available to evaluate current grantee projects and determine if funding should be continued select the appropriate grantees. Reduced frequency is not possible as the annual frequency to solicit applications and make grant awards coincides with the annual appropriation of funds by Congress. Furthermore, not collecting data for competitive projects would be inconsistent with Departmental policy and other authorities.

#### **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

Proprietary trade secrets or other confidential information are addressed at element 10 with excerpts from the HHS Grants Policy Statement.

There are no special circumstances that require collection of data to be conducted in any manner referenced in 5 CFR 1320.5.

#### **8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

A notice was placed in the Federal Register on November 28, 2011 (Volume 76, Number 228) page number 72934, soliciting comments to the ACF. We received seven comments on the proposed data collection from national organizations and private citizens. Four out of seven respondents submitted comments that were in support of the use of the ACF Performance Progress Reports – Program Indicators reporting form. These respondents believe that this data will be helpful in determining if grantees are proceeding in a satisfactory manner in meeting the approved goals and objectives of the project, and if funding should be continued for another budget period.

##### **General Comments**

Comments not attributable to specific section of the Federal Register notice are discussed below.

### **Concerns Regarding Self-Auditing**

1. Comment: One respondent strongly supports the use of an independent party to review the necessary data and fill out the reporting form. The respondent believes that accurate information will not be provided if the grantee is responsible for compiling the data and sending it directly to ACF. This, in turn, will provide very little insight into the effectiveness of the program and will not be helpful in ACF's determination of the grantees progress on the current grant.

Response: ACF appreciates the concerns expressed by the respondent and the suggestion provided in order to ensure that accurate information is being provided. We can assure the respondent that ACF intends to make every effort to ensure that grantees provide an accurate picture of the status of their projects. As required by the terms and conditions of the grant and as part of ACF oversight, ongoing communication throughout the grant period along with other required reporting will be helpful in determining the accuracy of the data that is being provided.

### **Concerns Regarding the Administration on Developmental Disabilities (ADD) Program**

2. Comment: Six respondents believe that ADD grantees should be subject to additional monitoring in order to provide a clear picture on how funds are being spent. The respondents have concerns about the effectiveness of programs with regards to individuals with intellectual disabilities. These respondents would like to ensure that funds are spent in accordance with the Developmental Disabilities Assistance and Bill of Rights Act of 2000.

Response: ACF appreciates and welcomes all comments. However, the Federal Register Notice specifically addresses and requests comments on the use of a new form to collect program performance data for all ACF discretionary grantees. Comments that are directed at an ACF program will be sent to the applicable program office to be addressed.

## **9. Explanation of Any Payment or Gift to Respondents**

There are no payments or gifts to applicants. The only remuneration is the grant payment dispersed to those entities parties awarded a grant.

## **10. Assurance of Confidentiality Provided to Respondents**

Not applicable.

### **11. Justification for Sensitive Questions**

Questions of a sensitive nature are not asked.

### **12. Estimates of Annualized Burden Hours and Costs**

The ACF estimates 6,000 grantees will submit the proposed form annually. On average the burden hours per response is 1 hour. Frequency is once at the end of the budget period. Therefore, the total hourly burden annually is expected to be 6,000 hours.

Total annualized dollar cost based on hourly burden, based on \$35 per hour burdened, is \$210,000 (\$35 X 6,000 hours).

#### **ANNUAL BURDEN ESTIMATES**

<b>Instrument</b>	<b>Number or Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Average Burden Hours Per Response</b>	<b>Total Burden Hours</b>
ACF-OGM-PPR-B	6,000	1	1	6,000

### **13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

Not applicable. Grantees for these project grants and cooperative agreements develop reports using current employees who have an in-depth knowledge of the organization's capabilities and finances. This applies to total capital and start-up, total operation and maintenance, and purchase of services costs, as well as program monitoring. In summary, there are no direct (incremental) monetary costs to respondents other than their time to provide the information requested for this form. Information on the monetization of those costs are provided above under A.12.

### **14. Annualized Cost to the Federal Government**

It is estimated that, on average, there are 2 hours of labor on the part of government employees to review grantee Program Indicator reports in order to make an informed decision for continued funding. The average annual number of respondents is 6,000

which equates to 12,000 hours of staff time. Based on an average of \$50 per hour, in monetary terms this equates to \$600,000.

**15. Explanation for Program Changes or Adjustments**

This is a new project.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Information in the Program Indicators report will not be published.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate**

There will be no exceptions to the practice of displaying the expiration date.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

Not applicable.

**B. Statistical Methods (used for collection of information employing statistical methods)**

Statistical methods are not used since there is no attempt to draw inferences about a population.