

Supporting Statement
Data Collection Form for Application for Federal Assistance
SF-LLL Disclosure of Lobbying Activities 4040-0013

The SF-LLL Disclosure of Lobbying Activities is an OMB approved collection (4040-0013) we are seeking an approval by OMB to reinstatement as a Common form. This form will be utilized by up to 26 Federal agencies and additional entities. We are requesting a 3-year clearance of this form.

A. Justification

1. Need and Legal Basis

Section 319 of the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1990, PL 101-121 (31 USC 1352) required that each person who request or receives a Federal contract, grant, cooperative agreements, loan or a Federal commitment to insure or guarantee a loan, must disclose lobbying. The Lobbying Disclosure Act of 1995 (PL 104-65) included some amendments to 31 USC 13542, popularly known as the Byrd Amendment. These amendments were effective 1/1/96.

2. Information Users

The SF-LLL is the standard disclosure reporting form for lobbying paid for with non-Federal funds, as required by the Byrd Amendment, as amended by the Lobbying Disclosure Act of 1995. The form is used by persons who request or receive a Federal contract, grant, cooperative agreements, loan or a Federal commitment to insure or guarantee a loan.

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

The collection of information is required to meet a statutory requirement; thus, the collection cannot be less frequently.

7. Special Circumstances

No such special circumstances exist.

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 6, 2014 (79 FR 65964) and a 30-day comment period on February 11, 2015 (80 FR 7604). 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. If application forms are submitted through the Grants.gov Apply mechanism, Grants.gov will maintain only transmission records pertaining to the files. Grants.gov will not maintain application materials and data.

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. By aggregating the agency's estimates as reported from the Grants.gov data call, an estimate of the total burden of the information collection was developed. All agencies with grant programs that award grants to organizations are eligible to use this form.

HHS received 8,388 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 8,388 hours.

SF-LLL Disclosure of Lobbying Form 4040-0013 Estimated Annualized Burden to Respondents

AGENCY	SF-LLL Number of Annual Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden on Respondent per Response in Hours	Total Burden Hours
HHS	8,388	1	8,388	1	8,388
TOTAL	8,388		8,388		8,388

Section B. Burden Cost

SF-LLL Disclosure of Lobbying Form 4040-0013 Estimated Annualized Cost to Respondents

Cost To Respondents				
AGENCY	Type of Respondent	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
HHS	Grant Writer	\$ 30.00	8,388	\$ 251,640.00
TOTAL			8,388	\$ 251,640.00

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 \$251,640.00.

13. Capital Costs

The proposed collection is based on the SF-LLL Disclosure of Lobbying Form currently in use. There is no projected incremental increase in the cost burden to respondents and record keepers associated with the use of the revised form.

14. Cost to the Federal Government

The proposed collection is based on the form currently in use. 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.

Agency personnel time to review the form is estimated at 1.3 hours per form. Based on 134,564 responses per year the total Burden Hours on Agency Personnel is (134,564 x 1.3 hours) 174,933 hours.

Grants administrative personnel generally are in the GS-9 through GS-15 range. Based on a step one average of these grades, an average hourly salary is \$39 per hour.

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
8,388	1.0	8388	\$39.00	\$327,132

Therefore, 8,388 annual applications = \$327,132.00 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.