

# Iowa **WORKFORCE** Development

January 28, 2022

TO: Ms. Mara Blumenthal (ICR Point of Contact)

FROM: Mr. John M. Blomstrand, The State of Iowa-IWD Grant Writer

**ICR: "DOL-OASAM: Generic Solution for Funding Opportunity Announcement"**

**RE: Formal Submission of ICR Agency Response Comments, OMB Control Number, 1225-0086**

On behalf of the State of Iowa's Iowa WORKFORCE Development (IWD), we are pleased to submit for agency review and consideration, a series of comments related to your posted **DOL-Generic Solutions for FOA, with OMB Control Number 1225-0086**.

**We ask that this comment package be formally included in your collected agency responses for this ICR.**

After considering the narrative of your ICR Purpose Statement, *several* thoughts come to mind, outside of just time burden, structure, collection activity, cost burden, information utility and value.

One of the disparities I see is concentrated on the **"Estimated Time Per Response; 20 Hours"**. Having wrote hundreds of federal grants across 22 federal agencies and offices now, my perspective is that this is *severely* under-stated in number. For instance, I am working on FOA-VETS-22-01 (DOL) now. I estimate the time in aggregate man-hours to research, work across SME's, write, edit, and submit at **140+** hours. Even many of the smaller, less complex FOA responses still require **50-70** hours.

It is unfair to also infer that **"Total Estimated Annual Other Costs Burden is zero"**. Staff time expenditure is many times notable, as it includes insurance, vacation, sick, IT, and the costs of fringe benefits. When compounding this fractional time across multiple staff, and senior staff, there is very often *large* cost burdens to produce and submit these FOA responses. I would not be surprised if the cost per average agency response was in excess of \$10,000.

The FOA tool is well-known and easy to use for grant writers and grant teams. It is predictable, has known and understood structural components, is very often repeatable in many elements, is always exceedingly clear to potential respondents, and is useful in deciphering the main needs, aspirations, and requirements of that particular agency funding opportunity. *It is my hope that DOL continues to utilize the FOA across program and office needs into the future.* It has a role in how more generic opportunities are presented.

One thing I have also thought related to this ICR is how DOL can move from "generic" to "generic-unsolicited". *This is actually very critical.* So often, we develop cutting-edge solutions, approaches, new models, and integration schemas with *better than the current* performance measures and program outcomes. Sometimes these are ideas of sheer brilliance that are left without a home and a solicitation to apply them to, and never have them applied or to be considered under any particular awarding. *This is very much unfortunate on so many levels.*

**There should be a better mechanism for long-term awardees and DOL partners like IWD to present these ideas.** As DOL like other federal agencies modernize, innovates, and improves, there could be significant new *conceptualizations of value* that help DOL shape and craft future submissions.

**DOL has to find a better mechanism for this, including future-building workshops, unsolicited innovation packages, innovation ideas that link *directly* to DOL Strategic Planning and the PAR, dashboards that allow for innovation-themed proposals (without FOA's), drivers to new-era performance management that demonstrates a new value equation beyond "counting widgets", and ways to receive and consider these important contributions, outside for formally issued FOA's.**

DOL needs to expand how they partner with the idea economy, and specifically with state agencies like IWD who can contribute new work products, ideas, concepts, and articulations critical to the way DOL thinks and rethinks these awards. DOL could look at these ideas as shaping pieces in the way their internal teams construct these important federal awards.

Even though many elements have been enhanced via technology in recent years, the assembly of individual components is still largely un-automated and manual. Over time it would be of enormous benefit to the FOA respondent community if there was a dashboard tool that could become a singular point of submission outside of Grants.gov. Being government-wide in usage, there are often issues with submission, especially finite, and complex technical issues.

*It is hard for state agencies to always know or understand specific methodologies that are utilized by DOL in the estimation, forecasting, and stating of time and cost estimates. These are seldom transparent, and almost never really known.*

There could be better attempts at information sharing and transparency in this regard. DOL and your state partners have a vested interest in being able to understand the nature of these impacts.

Reporting obligations are mostly *not* excessively burdensome at DOL, unlike other places across the USG. Perhaps these methodologies, assumptions, and mathematical models could be shared in ways that allow your state partners to make determinations that would add more value to these information collection activities.

There are smart, legal, and practical reasons to collect, review, and understand these data sets. Understanding these impacts is proper and appropriate for DOL. Being able to use this data to restructure internal work processes, and to be able to validate external impacts is important in the context of how the US Department of Labor (DOL) operates.

**This information from a state perspective is incredibly useful in our planning, resource allocation, budget development, and enterprise staffing areas. This information could also be useful in making fact-based, decision-science led determinations on the cost benefit analysis of writing and producing these grant responses. It is invaluable information in many ways that we all need to have and understand.**

**We are pleased to provide this collection of related ICR-based comments for the public record. Additionally, we thank DOL-OASAM for their leadership in the consistent manner that you work with your State-based partners. We know the complexity of your challenges and full portfolio.**

***We are appreciative of your work and consideration under this specific ICR.***