

SUPPORTING STATEMENT
FOR THE
ADMINISTRATION FOR NATIVE AMERICANS
OBJECTIVE WORK PLAN,
PROJECT ABSTRACT
AND OBJECTIVE PROGRESS REPORT

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Project Abstract and Objective Work Plan information collections are conducted in accordance with 42 USC of the Native American Programs Act of 1972, as amended. These collections are necessary to evaluate applications for financial assistance and determine the relative merits of the projects for which such assistance is requested, as set forth in Sec. 806 [42 USC 2991d-1] (a)(1).

The Objective Progress Report information collection will be conducted in accordance with Sec. 811 [42 USC 2992] of the Native American Programs Act and will allow ANA to report quantifiable results across all program areas. It will also provide grantees with parameters for reporting their progress and help ANA better monitor and determine the effectiveness of their projects.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collected in the Objective Work Plan (OWP) is used by ANA to determine if an applicant has a solid implementation plan from which to carry out a proposed project. Applicants complete this as part of their funding applications. It is a planning and implementation tool which requires grantees to map out their goals, objectives, activities, resources, and timeframes for their projects. It is used on the front end during the panel review process, and by ANA program specialists throughout the grant period to compare projected objectives and activities against actual accomplishments in order to gauge grantees' progress. The Project Abstract is also a required component of the funding application and is used as a summary by ANA and peer panel reviewers to gain an understanding of the projects that are proposed. The Objective Progress Report (OPR) is submitted to ANA on a quarterly basis and provides grantees with a set format by which they report on their performance indicators, progress achieved, and training and technical assistance needs. This standardized format will allow ANA to

report quantifiable results to Congress and flag grantees that may need additional training and/or technical assistance to successfully implement their projects.

- 3. Describe whether, and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Applicants are able to electronically submit the OWP and Project Abstract through the use of www.grants.gov. The OPR is a fillable form which grantees can complete electronically and submit to ANA at anareports@acf.hhs.gov, or by fax or post. ANA has offered the e-mail option in order to ease the burden on grantees and encourage the timely submission of quarterly reports.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

ANA has reviewed information collection instruments and has determined that there are no existing forms which can be used to meet ANA's data collection needs.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The information being requested has been held to the absolute minimum required for the intended use.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.**

Failure to collect this information would violate the legislative mandate of the Native American Programs Act of 1974 as amended. The OWP and Project Abstract are required one time only (at the time of application), and the OPR is necessary on a quarterly basis in order to effectively monitor ANA projects. Reducing the frequency of the OPR would hamper ANA's efforts to exercise oversight of its funded projects and would preclude ANA from offering timely training and technical assistance to grantees in need.

- 7. Explain any special circumstances that require the collection to be conducted in a manner:**

There are no special circumstances requiring these collections to be conducted in any manner described in Item #7 of the OMB Supporting Statement Instructions and Guidance.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Attached are copies of the First and Second Federal Register Notices (June 9, 2006, p. 33461 and August 18, 2006, p. 47814, respectively). No public comments have been received in response to these notices.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts have been or will be provided to any respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Information being requested in the OWP, Project Abstract and OPR is not considered confidential, therefore no additional safeguards are considered necessary beyond that customarily applied to routine government information. In rare cases, grantees may insert or attach information to their OPRs such as community meeting attendance lists that include contact information. ANA will take reasonable precautions to keep information contained in the OPR private to the extent permitted by law. The OPR will be "housed" electronically on the ANA shared drive and will be prudently maintained by ANA.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This is not applicable. No information of a sensitive nature is requested in the OWP, Project Abstract or OPR.

- 12. Provide estimates of the hour burden of the collection of information.**

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
OWP	500	1	3	1,500
Project Abstract	500	1	.5	250
OPR	275	4	1	1,100

Estimated Total Annual Burden Hours: 2,850

The average reporting burden for these information collections includes the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. The burden hours submitted in the last information collection request were greatly overestimated, and the number of allowable objectives in a project proposal has since been reduced. As a result, the burden hours have been reduced.

13. Provide an estimate of the annual cost burden to respondents or record keepers resulting from the collection of information.

The annual cost burden to respondents or record keepers resulting from the collection of information is expected to be zero.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from 12, 13, and 14 in a single table.

The estimated annualized cost to the government to collect and analyze this data is expected to be zero.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no program changes or adjustments reported in items 13 and 14 of the OMB Form 83-I.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project,

including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

The OWP will not be published. Portions of the Project Abstract may be shared on ANA's website as Project Summaries. These would be published shortly after grant awards have been made in order to promote transparency. OPRs will be tabulated and the aggregate data shared with Congress and other stakeholders on an annual basis.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

This is not applicable.

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," on Form OMB 83-I.**

This is not applicable.