

PPR 2007 Revision

Supporting Statement:

National Senior Service Corps (Senior Corps) Revised Project Progress Report (PPR) for the Foster Grandparent Program, Senior Companion Program, and RSVP (Retired and Senior Volunteer Program).

A. Justification

(1) Circumstances That Make Information Collection Necessary

The project progress report (PPR) was designed to cover the performance reporting requirements of OMB Circulars A-102 and A-100, and as referenced in Program Regulations for the Foster Grandparent Program, Senior Companion Program, and RSVP.

Reference:

- a) *Corporation for National and Community Service: Foster Grandparent Program*
45 CFR Parts 1208 and 2552
RIN 3045-AA18
ACTION: Final regulations.

Sec. 2552.25 What are a sponsor's administrative responsibilities?

2552.25 (g) - Establish record keeping/reporting systems in compliance with Corporation requirements that ensure quality of program and fiscal operations, facilitate timely and accurate submission of required reports and cooperate with Corporation evaluation and data collection efforts.

- b) *Corporation for National and Community Service: Senior Companion Program*
45 CFR Parts 1207 and 2551
RIN 3045-AA17
ACTION: Final regulations.

Sec. 2551.25 What are a sponsor's administrative responsibilities?

2551.25(g) - Establish record keeping/reporting systems in compliance with Corporation requirements that ensure quality of program and fiscal operations, facilitate timely and accurate submission of required reports and cooperate with Corporation evaluation and data collection efforts.

- c) *Corporation for National and Community Service: RSVP (Retired and Senior Volunteer Program)*
45 CFR Parts 1209 and 2553
RIN 3045-AA19

ACTION: Final regulations.

Sec. 2553.25 What are a sponsor's administrative responsibilities?

Sec. 2553.25(g) - Establish record keeping and reporting systems in compliance with Corporation requirements that ensure quality of program and fiscal operations, facilitate timely and accurate submission of required reports and cooperate with Corporation evaluation and data collection efforts.

The proposed revised PPR will continue to collect data related to the collection of Government Performance and Results Act (GPRA) and other outcome programming specifications. Specific revision requests are: (1) eliminate all quarterly reporting requirements in favor of semi-annual submissions; (2) eliminate the "Data Demographic" section; and (3) change the submission of the "Data Supplemental" from biennial to annual.

(2) How, By Whom, And For What Purpose the Information is Used

The Project Progress Report (PPR) was designed to meet agency program management requirements and to ensure that projects address and fulfill legislated program purposes and associated work plan objectives agreed-upon in the granting of the award. Information is used by agency management to determine that projects are achieving goals and objectives, gauge progress toward meeting grantee identified performance measures, identify technical assistance needed to correct deficiencies, manage budget variances and resource issues arising in grants, and help to establish priorities for scheduling site visits. If the PPR information was not submitted, the agency would be unable to fulfill these purposes, possibly resulting in inefficient or inappropriate operations.

The revised PPR will be used by Senior Corps grantees to report progress toward accomplishing work plans, tracking performance measures, identifying technical assistance needed and challenges encountered, and success stories.

(3) Use of Information Technology

The PPR is available to Senior Corps grantees through the Corporation's web-based grant management system, "eGrants". Senior Corps grantees began using the eGrants systems in September 2002 and five years later, are fully indoctrinated into the use of the system for grant application, management and reporting.

The requested revised PPR continue to allow grantees to enter, update, save, print and access the latest information about their grants across a secure connection.

The electronic submissions of PPR from individual Senior Corps grantees are retained in the eGrants database or its related component, the Corporation's Data Warehouse, for no fewer than seven (7) years.

(4) Efforts to Identify Duplication

The PPR form requests only the minimum information required for proper management and does not duplicate information requested in other reports or available from other sources.

(5) Efforts to Minimize Burden to Small Organizations

The Corporation is cognizant of the burdens imposed on grantee organizations. Senior Corps has made every reasonable effort to minimize burden imposed by data collection and to invite suggestions and comments from the broadest possible cross-section of grantees in its information management processes.

Submission requirements proposed will be revised to conform to Corporation-wide policies of semi-annual progress reporting.

(6) Consequences of Less-Frequent Collection

Collection less frequently would reduce agency oversight of programmatic activities with increased likelihood of problems developing.

Less frequent collection would also compromise the Corporation's ability to capture, aggregate and report performance measures needed to annually report to decision-makers, including the Administration and the Congress, including in support of annual budgets and reporting Government Performance and Results Act (GPRA) actual yearly totals.

(7) Special Circumstances

None of the special circumstances apply to this data collection.

(8) Federal Register Notice and Solicitation of Comments

An initial Federal Register notice was published on January 17, 2007 , announcing a 60-day review and comment period on the Senior Corps' intent to revise its Project Progress Report (PPR) to:

- (1) Eliminate all quarterly reporting requirements in favor of semi-annual submissions;
- (2) Eliminate the "Data Demographic" section; and
- (3) Change the submission of the "Data Supplemental" from biennial to annual.

Project sponsors and the public were encouraged to submit comments.

Full text of the Federal Register announcement was shared via the Corporation State Offices, the Senior Corps Internet listserv, with more than 800 subscribers), and e-mailed to each Senior Corps grantee. Regular postings on the Senior Corps listserv reminded subscribers of

the open comment period. The 60-day Federal Register notice was also posted at the Corporation's website, www.nationalservice.org

Summary of Comments

A 60-day public comment Notice, regarding modification of the Project Progress Report was published in the Federal Register on January 17, 2007. This comment period ended on March 19, 2007. A total of 11 responses were received, some of which contained multiple comments, representing a total of 31 individuals. The summary of comments received is as follows:

In summary:

- (a) Six comments supported the suggested changes and noted that the proposed revisions will make reporting easier and more streamlined.
- (b) One comment suggested that the semi-annual "Data Demographic" section be retained, and that the proposed annual Data Supplemental Sheet (known as the Project Profile and Volunteer Activity) be eliminated. The Corporation believes that its proposal will result in more streamlined reporting and greater data accuracy, since all projects would report activities and outputs within the same time period. This is currently not the case, due to the fact that grantees submit Project Progress Reports according to their own grant cycle.
- (c) Four comments were beyond the scope of this information collection. They included one observation that overall burden has increased at the local level due to the greater emphasis on outcome-based programming. The emphasis on quantifiable outputs and outcomes transcends the Corporation and applies to all federal agencies under the Government Performance and Results Act (GPRA) and as such, the Corporation lacks discretion to implement changes resulting in lack of outcome performance. Another comment requested that deadline for report submission be increased from the current 30 days after the close of the 6-month period to 45 days after the close of the 6-month period. The due dates of reports after the close of the reporting period is determined by Corporation policy that applies to all of the agency's programs. The standard is currently 30 days. The Senior Corps will share this request for a 45-day due date with the agency-wide Compliance Working Group for consideration.

Concurrent with the submission of the present 83-I package, the Corporation is sending e-mail copies of the revised Project Progress Report to members of the public who requested a copy during the 60-day comment period from the Corporation's point of contact listed in the notification. The availability of the revised application for review and comment will also be advertised via the Senior Corps' Internet listserv and the application will be posted on the Corporation's web site for viewing, printing, and download.

(9) Decisions to Provide Payments to Respondents

No payments will be provided

(10) Confidentiality

The data reported does not pertain to individuals. The information collection and data maintenance process will comply with provision of the Privacy Act, as amended, and applicable sections of OMB Circular A-130, "Management of Federal Information Resources".

(11) Sensitive Questions

No sensitive questions are included in the data collection instruments.

(12) Estimates of the Information Collection Burden

There are 1,350 Senior Corps grantees, including a small number of component projects. Total aggregate burden on all respondents is estimated at 10,800 hours. This is a 1,245 hour decrease in the previously approved data collection burden of 12,045 collective hours. All Senior Corps grantees will submit progress reports on a semi-annual basis. The per-respondent burden is estimated to be 8 hours, which is a decrease from the previously approved level of 9.2 hours per respondent. These estimates are based on:

- Project input from experience in using the form and collecting the necessary performance data over several years;
- Recalculating data entry hours due to the removal of twice yearly "Data Demographics" and offsetting the gain with the shift in the "Data Supplemental" from biennial to annual.

(13) Estimate of Annualized Cost to Respondents

The estimated burden per respondent is \$1.50 for each respondent, based on semi-annual reporting that factors in the fraction of Internet connection/communications time. The total is \$2,025.

(14) Cost to the Federal Government

Annualized direct costs to the Federal Government, for systems to support electronic information collection for Senior Corps is estimated at approximately \$250,000. Approximately 25% of this cost is associated with this Information Collect, as follows:

- (a) Software Developer Contractor Costs: Contractor costs to develop and modify eGrants system screens and functionality. The Senior Corps apportionment of total software developer contractor costs is \$200,000 per year. This Information Collection represents approximately 25% of total cost, or \$50,000 annually.
- (b) Contractor Help Desk Costs: The Corporation retains the services of a contractor to staff and manage a help desk that provides direct services to its grantees and

applicants. The Senior Corps apportionment of the total help desk contractor costs is estimated at \$50,000 annually, with approximately 25% or \$12,000.

(15) Reasons for Changes in Burden

Changes in Annualized cost to Respondents: The Corporation, including the Senior Corps, has adopted an agency standard unit cost of \$18.77 per respondent. There are 1,350 respondents, which equates to a cost of \$25,339.50. This cost is then multiplied by the number of responses – with two reports per year submitted, this is 2,700 responses. The cost per respondent is then multiplied by 2,700 to equal a total of \$68,416.50.

(16) Plans for Tabulation and Publication

Data and reports are used both internally and externally. Internally, individual Corporation project managers review their respective grantee submissions to ensure quality programming, progress toward work plans, performance measures tracking and achievement, and other elements of project operations. The PPR is the primary tool to update and inform the Corporation about each grantee's progress and status. Also internally, data are aggregated and used to report externally to the Congress and other audiences as part of the annual Performance Report, in support of the Government Performance and Results Act (GPRA). Various configurations of data compiled from individual PPRs are used for internal management, and to respond to specific data and information requests.

(17) Approval to Not Display Expiration Date

Not applicable. The requested expiration date of August 31, 2010 will be displayed upon OMB approval.

(18) Exceptions to Certification in Item 19

No exceptions are requested.

B. Not Applicable