

**SUPPORTING STATEMENT**  
**FOR THE**  
**ADMINISTRATION FOR NATIVE AMERICANS (ANA)**  
**GRANT APPLICATION DATA SUMMARY (GADS) FORM**

OMB No. 0970-0328

**A. Justification**

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

The Grant Application Data Summary (GADS) 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 focus of the projects for which such assistance is requested, as set forth in Sec. 806 [42 USC 2991d-1] (a) (1).

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

The Grant Application Data Summary (GADS) form collects information from applicants seeking grants from the Administration for Native Americans (ANA).

ANA awards annual grants in nine competitive areas. Previously, ANA collected information using the GADS form for four competitive areas. The GADS form, which is part of the ANA discretionary grant application package and reflects each competitive area and program announcement, had to be revised to comply with required changes made to the ANA FY 2009 Program Announcements (PAs). The PAs were changed to comply with a new policy recently established by ACF, requiring that subcategories within a PA be broken down into a stand-alone PA. On 12/5/2008, ANA published nine PAs, instead of four. To support this new requirement for separate PAs, it was necessary for ANA to change the GADS form to reflect each new PA.

The respondents are Federally Recognized Indian Tribes, Tribal Governments, Native American Non-Profits (including American Indians, Alaska Natives, Native Hawaiians, and other Pacific Islanders), and Tribal Colleges and Universities.

The information collected from this form is used by ANA to develop several annual and historical/comparative reports for the Commissioner of ANA as well as annual Congressional Reports as to the types of projects ANA is funding and the focus of these projects. These reports are broken out by the ANA program categories (Social & Economic Development Strategies {SEDS}, Alaska SEDS, Family Preservation Planning, Family Preservation Implementation, Language Assessment, Language Planning, Language Implementation, Language Immersion, and Environmental); "ANA Areas of Interest" (business development, youth development, etc); States; ANA Technical Assistance Regions; and type of applicants (Federally Recognized Tribe, consortia, non-profit organization, etc). These reports are prepared annually and the data collected from previous years is compared. This historical/comparative report helps

ANA determine if more Technical Assistance is needed in certain regions; if different marketing strategies need to be developed to promote the ANA Funding Categories, if different applicants require more specific Technical Assistance, and how much funding is being requested from applicants within specific regions.

Applicants complete this as part of their grant applications. This standardized format will allow ANA to effectively develop these historical/comparative reports.

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

Applicants are able to electronically submit the GADS form through the use of [www.grants.gov](http://www.grants.gov). ANA has offered the grants.gov option for completing application requirements in order to ease the burden on applicants and encourage the submission of applications. The applicant has the option to submit a hard copy of this form with the application package or via [www.grants.gov](http://www.grants.gov).

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

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. Impact on Small Businesses or Other Small Entities**

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

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

Failure to collect this information would violate the legislative mandate of the Native American Programs Act of 1974 as amended. The GADS form is required one time only (when submitting application). Reducing the frequency of the GADS form would hamper ANA's efforts to exercise oversight of its applications and would preclude ANA from offering timely training and technical assistance to applicants in need.

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

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

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

Attached please find copy of Federal Register Notice, Volume 74, Number 30, dated February 17, 2009, page 7444 – 7445.

The only public comment received in response to the notice was a request to view the actual document or data collection tool. In response, a copy of the GADS form was forwarded via email to the individual (copy of correspondence attached).

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

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

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

Information being requested in the GADS form 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 GADS form such as Tribal or Organizational Profiles that include contact information. ANA will take reasonable precautions to keep information contained in the GADS form private to the extent permitted by law. The GADS form will be “housed” electronically on the ANA shared drive and will be prudently maintained by ANA.

**11. Justification for Sensitive Questions**

This is not applicable. No information of a sensitive nature is requested in the GADS form.

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

The following is the hour of burden estimate for this information collection:

Number of Applicants	Number of Responses per Applicant	Average Burden Hours per Response	Total Burden Hours
500	1	.5	250

**Estimated Total Annual Burden Hours: 250**

The dollar equivalent would be \$15 X 250 hours or \$3,750.

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

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

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

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

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

Due to a program change, the GADS form had to be revised. The GADS form, which is part of the ANA discretionary grant application package and reflects each competitive area and program announcement, had to be revised to comply with a new policy recently established by ACF, requiring that subcategories within a Program Announcement (PA) be broken down into a stand-alone PA.

To support this new policy for separate PAs, it was necessary for ANA to change the GADS form to reflect each new PA. Prior to this new policy, ANA offered four program categories for which an applicant could apply for a grant. Those categories were: (1) Social and Economic Development Strategies; (2) Healthy Marriage Initiative; (3) Language Preservation and Maintenance; and (4) Environmental Regulatory Enhancement. Originally there were subcategories with the SEDS, Healthy Marriage and Language program areas/categories. To comply with the new policy, the subcategories within those program areas became separate program areas and new program

announcements for those new categories had to be developed, reviewed and vetted through ACF. The GADS form could not be completed until all program announcements were approved. The program announcement approval process took several months.

The nine program categories are now as follows: (1) Social & Economic Development Strategies (SEDS); (2) Alaska SEDS; (3) Family Preservation Planning; (4) Family Preservation Implementation; (5) Language Assessment; (6) Language Planning; (7) Language Implementation; (8) Language Immersion; and (9) Environmental Regulatory Enhancement.

The GADS form is a data collection tool used by ANA to specify which program area the applicant is actually applying for. ANA grant applicants are required to complete the form when applying.

Adding the new program areas/categories to the GADS form does not impact burden on respondents.

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

The GADS form will not be published. The information on the GADS form will be tabulated and the aggregate data shared with Congress and other stakeholders on an annual basis.

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

This is not applicable.

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

This is not applicable.

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

**1. Respondent Universe and Sampling Methods**

Respondents are ANA grant applicants. Sampling methods are not applicable with this collection activity. The data collected is focused on which program area (i.e., SEDS, Family Preservation, Language, etc) the applicant is applying for. ANA grants are awarded annually so the submission of the GADS form is once a year by each applicant.

**2. Procedures for the Collection of Information**

The GADS form is a document that is part of the ANA grant application package. Applicants are required to complete and submit the form along with all other mandatory documents at the time they are applying for a grant. Responses from each applicant are collected and keyed into a "GADS" database upon receipt of the grant application.

**3. Methods to Maximize Response Rates and Deal with Non-response**

Requiring that the GADS form be completed and submitted with the grant application package ensures the applicant will fill out the form, therefore maximizing the response rate.

**4. Test of Procedures or Methods to be Undertaken**

This data collection procedure and form has been used over the last 4 years and has proven to be successful in providing the needed results.

**5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data**

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