

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

OMB No. 0980-0204

**A. Justification**

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

Minor content adjustments were made to the Objective Progress Report, previously approved under information collection (OMB No. 0980-0204). There are three components/forms that make up this information collection tool: The Objective Work Plan, Project Abstract, and the Objective Progress Report. Content adjustments affect the OPR ONLY. The other two forms remain the same.

The Objective Work Plan and Project Abstract 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 is 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 also provides grantees with parameters for reporting their progress and help ANA better monitor and determine the effectiveness of their projects.

**2. Purpose and Use of the Information 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 are required to complete this as part of their funding application package. The OWP is a planning and implementation tool which requires applicants to map out their goals, objectives, activities, resources, and time frames 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 allows ANA to report quantifiable results to Congress and flag grantees that may need additional training and/or technical assistance to successfully implement their projects.

**The following are content adjustments being made within specific sections of the OPR.**

**OBJECTIVE WORK PLAN UPDATE** Section: Add 1<sup>st</sup> through 4<sup>th</sup> quarter results for activities within each Objective (Q1, Q2, Q3, & Q4). The grantee can continue to add to this form each quarter (instead of typing into new form), reflecting cumulative results throughout the project period rather than just the one quarter.

**FINANCIAL** Section: Add 2 Questions: (1) Provide details on any income generated as a result of ANA project activities; (2) Provide details on any changes made to the budget during the reporting period.

**NATIVE AMERICAN YOUTH AND ELDER OPPORTUNITIES** Section: Add 1 Question: (1) Provide details on any intergenerational activities between grandparents and grandchildren.

**Section Added:**

**PROJECT SUSTAINABILITY:** (1) Provide details on the grantee's intention to continue the project benefits and/or services after the project period has ended.

This is the end of the OPR content adjustments made for which OMB approval and clearance is requested. There are no changes being made to the OWP or to the Project Abstract.

The ANA applicants/grantees providing the information requested 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.

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

Applicants are able to electronically submit the OWP and Project Abstract through [www.grants.gov](http://www.grants.gov). The OPR is a fill-able form which grantees can complete electronically and submit to ANA at [anareports@acf.hhs.gov](mailto:anareports@acf.hhs.gov), or by fax or postal service. ANA has offered the electronic mail option in order to ease the burden on grantees and encourage the timely submission of quarterly reports.

### **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 that 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 OWP and Project Abstract are required one time only (at 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. 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**

The 60-day Federal Register Notice, Vol. 73, No. 216, page 66049, published on December 3, 2008. No public comments were received in response to this notice.

The 30-day Federal Register Notice, Vol. 74, No. 47, page 10744, published on March 12, 2009. No public comments were received in response to this notice.

**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 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 is

"housed" electronically on the ANA Desktop system and is prudently maintained by ANA.

### 11. Justification for Sensitive Questions

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

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

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

<b>INSTRUMENT</b>	<b>NUMBER OF RESPONDENTS</b>	<b>NUMBER OF RESPONSES PER RESPONDENT</b>	<b>AVERAGE BURDEN HOURS PER RESPONSE</b>	<b>TOTAL BURDEN HOURS</b>
OWP	500	1	3	1,500
Project Abstract	500	1	.5	250
OPR	275	4	1	1,100
				2,850

**Estimated Total Annual Burden Hours: 2,850**

The dollar equivalent would be \$0 X 2,850 hours or \$0.

### 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 federal government to collect and analyze this data is expected to be zero.

### 15. Explanation for Program Changes or Adjustments

Adjustments to the OPR, specifically in the section titled "Objective Work Plan Update," were made so the form can be filled out throughout the year of the grantee's project rather than just one quarter at a time. The other adjustments made were to "fine tune" answers to questions by requiring detailed explanations, rather than answering "yes" or "no." The final adjustment made to the OPR was to request details on the Project's Sustainability once the ANA grant period has ended. Since ANA strives to fund projects that help Native American communities become self-sufficient and self-sustaining, this question is relevant and important data to be included in annual reports to Congress and to the public at large.

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

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 the grant awards have been made in order to promote transparency. OPR's 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 applicants/grantees. Sampling methods are not applicable with this collection activity. The OWP and Project Abstract are required one time only (at time of application). The OPR is required to be completed by grantees on a quarterly basis in order to effectively monitor ANA projects.

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

The OWP, Project Abstract, and OPR are forms that are part of the ANA grant application package. Applicants are required to complete and submit the forms along with all other mandatory documents at the time they are applying for a grant. The data collected is from only those applicants who are awarded a grant. The actual completed grantee forms are scanned and saved on to ANA's Desktop system into each awarded project's electronic file. Information collected from the Project Abstract and OPR are keyed into a database from which annual reports are generated.

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

Requiring that the OWP, Project Abstract and OPR be completed and submitted with the grant application package ensures applicants will complete each form, thereby maximizing the response rate. It is also mandatory for each grantee to complete the OPR every quarter throughout the life of the project, therefore ensuring responses are maximized.

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

ANA's data collection procedures and use of the OWP, Project Abstract, and OPR over the last 4 years have had satisfactory results so testing will not be undertaken.

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