

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 Congress 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. 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.

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 (at the time of 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 and Guidance.

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

The 60-day Federal Register Notice, Vol. 74, No. 93, Page 22934 – 22935, was published on May 15, 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 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 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

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
GADS Form (Includes the two methods of submission)	500	1	.5	250

Estimated Total Annual Burden Hours: 250

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 monetary value of this time is 250 hours times \$40 per hour which equals \$10,000.

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

There are no adjustments or program changes for this request.

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. Reason (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 GADS form is required to be completed one time only, which is at the time of application.

2. Procedures for the Collection of Information

The GADS form is part of the ANA grant application package. Applicants are required to complete and submit this form along with all other mandatory documents at the time they are applying for a grant. The information collected from the GADS form is keyed into a database from which annual reports are

generated, as well as reports to Congress regarding the types and focus of projects ANA is funding.

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 applicants will complete the form, thereby maximizing the response rate.

4. Test of Procedures or Methods to be Undertaken

ANA's data collection procedures and use of the GADS form over the last 4 years 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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