

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

OMB No. 0980-0204

A. Justification

1. Circumstances Making the Collection of Information Necessary

Content changes are being made to the OPR and OWP ONLY, 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 and the OWP only. The abstract form is no longer being managed by ANA. Grants.gov has taken over the management of this form and will submit any additional requests for this submission.

ANA has reworded and renumbered the OPR questions to allow for consistency and clarity. The majority of information being requested from the grantees remains significantly the same with only minor edits for clarification purposes.

The information in the OPR is collected on a quarterly basis to monitor the performance of grantees and better gauge grantee progress. The OWP is utilized by applicants when they submit their proposals and then by grantees to monitor their projects once awarded.

The Objective Work Plan information collection is 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 helps 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 viable 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 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.

Changes Specific Sections of the OWP.

Problem Statement: ANA has added a field for applicants to include the problem statement they identify in their grant application.

Position Performing the Activity: On the previous OWP, ANA requested applicants to provide the position responsible for each activity. ANA has changed this title to “position performing the activity” and applicants are asked to identify the lead person in one column and other support person in the second column.

Changes to Specific Sections of OPR.

Impact indicator: The information requested in this section is similar to those in the previous OPR with a few additions.

- a. Question 5 was originally captured under question 11 of the previous OPR. ANA has added four fields to this section-tracking mechanism, pre-grant status, end-of-grant target and three-year target to align with ANA’s funding opportunity announcement. This information is currently requested by applicants when they submit an application, so there will be no additional burden to answer these questions.
- b. Questions 5a and 5b are new and ask the grantee for the status of the impact indicator at the end of each budget period. This information was captured quantitatively in the previous OPR. Therefore, there is no additional burden on grantees for answering these questions.

Financial: Question 17 is new.

- a. This question will not pose additional burden to grantees because grantees will be able to respond to this question by utilizing the required OPR and SF-425 forms.
- b. Question 18 was originally question 8 on the previous OPR.

Assets for Independence (AFI): Seven additional questions have been added specifically to respond to a special initiative ANA funded this year. Only grantees that

received funding under the Asset for Independence program are required to respond to these questions.

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 through www.grants.gov. The OPR is a fill-able form which grantees can complete electronically and submit to ANA at 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. ANA is currently in the planning process to utilize the Online Data Collection (OLDC) system. Our grantees will submit their OPRs online through this system once we have completed this transition.

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 is 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 responsibilities of its funded projects and would preclude ANA from offering timely training and technical assistance to grantees.

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. 76, No. 157, page 50482, published on August 15, 2011. 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 and OPR is not considered confidential. Therefore, no additional safeguards are considered necessary beyond those that are 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 OWP and OPR are "housed" electronically on the ACF GrantSolutions system.

11. Justification for Sensitive Questions

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

12. Estimates of Annualized Burden Hours and Costs

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

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
OWP	500	1	3	1,500
OPR	275	4	1	1,100
				2,600

Estimated Total Annual Burden Hours: 2,600

The dollar equivalent would be \$0 X 2,600 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

ANA made a few program changes to both the Objective Works Plan (OWP) and Objective Progress Report (OPR) data collection tools as described in element # 2 of this document and in the succeeding paragraphs. Although the contents of both tools remain essentially the same, both documents have been reformatted to simplify the data collection process and to ease the burden on the grantees. One important change is the reorganization of the forms to consolidate questions that relate to the same theme in one section. The rearrangement makes it easy for the grantees to respond to the questions. In some other cases, the questions were reworded for clarification purposes. In addition to reformatting the tools, the *Project Abstract* form has been eliminated because the form is no longer managed by ANA; thus reducing the burden on grantees. The total burden accounting has been reduced from 2850 hours to 2600 hours.

The following are changes to specific sections of the OWP.

ANA has reformatted the OWP (content is same). ANA has added a field for applicants to include problem statement identified in grant application and has separated the results and benefits expected section of the OWP to align with ANA's funding opportunity announcements. ANA is no longer requiring applicants to submit data on non-personnel hours. On the previous OWP, ANA requested applicants to identify the position responsible for each activity. ANA has changed this title to "position performing the activity" and applicants will be asked to identify the lead person in one field and other support personnel in a second field.

The following are changes to specific sections of the OPR.

Changes to the OPR form were made to allow for ease completion of the form. The questions have been re-ordered to consolidate questions that relate to the same theme in one section of the form. For example, all of the financial questions have been rearranged together in to one section. Also, questions have been rephrased for clarification purposes without any additional requests to the primary content.

Objective Work Plan Update: Content is the same. Questions 1 and 2 were originally questions 3 and 4 on the previous OPR. ANA has reduced the number of objectives under this section to 3. ANA is also separating the current status of expected results and the current status of expected benefits. This will match ANA's revised OWP.

Partnerships and Leveraged Resources: Content is the same. Questions 3 and 4 were originally part of questions 11-13. The leveraged resources table under question 4 has been reformatted to allow for easier data collection.

Impact Indicator: The information requested in this section is similar to those in the previous OPR with a few additions.

- a. Question 5 was originally captured under question 11 of the previous OPR. ANA has added four fields to this section-tracking mechanism, pre-grant status, end-of-grant target and three-year target to align with ANA's funding opportunity announcement. This information is currently requested by applicants when they submit an application, so there will be no additional burden to answer these questions.
- b. Questions 5a and 5b are new and ask the grantee for the status of the impact indicator at the end of each budget period. This information was captured quantitatively in the previous OPR. Therefore, there is no additional burden on grantees for answering these questions.

Native American Youth and Elder Opportunities: Content is the same. Questions 6 and 6a were originally questions 14 and 14a on the previous OPR.

Staffing: Content is the same. Questions 7 and 7a were originally question 16 on the previous OPR. Question 7b was originally question 15 on the previous OPR. ANA has added one field to this table: *type of position*.

Challenges: Content is the same. Questions 8 and 9 were originally questions 1 and 5 on the previous OPR. For question 9, ANA has added a table to capture information that was previously provided in a narrative format. Questions 10 and 11 were originally questions 2 and 6 on the previous OPR.

Project Sustainability: Content is the same. Questions 12 and 13 were originally questions 18 and 17 on the previous OPR.

Financial: The information requested in this section is similar to those in the previous OPR with a few additions. Questions 14-16a were originally questions 7, 9, and 10 on the previous OPR. Question 17 is a new. This question will not require the grantee to conduct additional work as they will be able to respond to this question utilizing the required OPR and SF-425 forms. Question 18 was originally question 8 on the previous OPR.

Assets for Independence (AFI): Seven additional questions have been added to this section to respond to a special initiative ANA funded in FY 2011. Only grantees that received funding under the Asset for Independence program are required to respond to these questions.

16. Plans for Tabulation and Publication and Project Time Schedule

The OWP will not be published. 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 is 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 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 required documents at the time they are applying for a grant. The data collected is from only those applicants who received ANA grant awards. The actual completed grantee forms are scanned and saved on to ACF's GrantSolutions system into each awarded project's electronic file. Information collected from the OPR is keyed into a database from which annual reports are generated.

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

ANA maximizes the response rate by requiring that the OWP and OPR be completed and submitted with the grant application package. ANA also requires each grantee to complete the OPR every quarter throughout the life of the project; thereby ensuring response rates are maximized.

4. Test of Procedures or Methods to be Undertaken

ANA's data collection procedures and use of the OWP and OPR over the last 6 years have had satisfactory results. Therefore, testing will not be necessary.

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

Kenneth Akwuole, 202-690-5793
Sarah Schappert, 202-205-4328