THE SUPPORTING STATEMENT FOR THE ADMINISTRATION FOR NATIVE AMERICANS PROJECT IMPACT ASSESSMENT SURVEY

A. Justification

1. Circumstances Making the Collection of Information Necessary

The ANA Project Impact Assessment Survey, previously approved under information collection number OMB CN: 0970-0379, expires on 7/31/2013. This statement is issued to support ANA's continued use of the survey, with minor changes.

The minor changes include rewording and moving questions between sections to allow for consistency and clarity. ANA also identified questions that were duplicative to our OWP form (OMB CN: 0980-0204), and has eliminated them from the survey. The majority of information ANA is requesting from the grantees through the survey remains significantly the same with only minor edits for clarification purposes.

The information collected by the Project Impact Assessment Survey (PIAS) is needed for two main reasons: 1) to collect crucial information required to report on the Administration for Native Americans' (ANA) established Government Performance and Results Act (GPRA) measures, and 2) to properly abide by ANA's congressionally-mandated statute (42 United States Code 2991 et seq.) found under the section titled 'Evaluation' in the Native American Programs Act of 1974, as amended, which states that ANA will evaluate projects assisted through ANA grant dollars "including evaluations that describe and measure the impact of such projects, their effectiveness in achieving stated goals, their impact on related programs, and their structure and mechanisms for delivery of services." The information collected with this survey will fulfill ANA's statutory requirement.

The Native American Programs Act of 1974 additionally states under the section titled 'Evaluation' that, "the projects assisted under this title shall be evaluated in accordance with this section not less frequently than at 3-year intervals." ANA will therefore continue to asses one-third of its grant portfolio each year to meet the assigned mandate; ANA visits roughly 70% of grantees in the final year of their projects, and ensures that the grantees selected for visits are only required to respond to the survey one time during the project period.

2. Purpose and Use of the Information Collection

The information collected in the PIAS will be used by ANA to report quantifiable results to Congress on the impact of grantees' projects and effectiveness in achieving their planned

project goals. The consequences of not collecting project information would result in ANA violating its congressionally-mandated statute.

The information collected in the PIAS will also serve as a valuable performance and planning tool for ANA. The analysis of information collected will provide an opportunity to review and make changes to ANA's internal policies and procedures in an effort to better support and serve grantees. Information collected on grantee best practices will be made available to all ANA grantees and will serve as a resource guide for implementing effective and efficient projects.

3. Use of Improved Information Technology and Burden Reduction

In order for ANA to obtain standardized and accurate data, the PIAS will be completed on-site with the grantee. The on-site process will allow ANA to verify planned project deliverables, meet with project beneficiaries, and ensure a respondent rate of 100%. The PIAS has been developed in personal document format (PDF), which will allow ANA to easily extract data and perform subsequent analysis.

The minor changes to the PIAS will not increase the reporting burden of ANA grantees.

4. Efforts to Identify Duplication and Use of Similar Information

ANA has reviewed existing information collection instruments and has determined that ANA's OWP and OPR forms, modified and approved by OMB in 2012, now include many of the same questions included in the PIAS. ANA has identified these duplicative questions and removed them from the PIAS. ANA has also modified the PIAS to require evaluators to pre-fill information to the extent possible and ask the grantee to verify this information during the visit. This approach allows ANA to update crucial information while lessening the reporting burden on grantees.

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

Collecting the information less frequently would violate the legislative mandate of the Native American Programs Act of 1974, as amended. Reducing the frequency of the PIAS would also hinder ANA's efforts to accurately report on its annual GPRA measures.

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 First Federal Register Notice was published on January 22, 2013, pages 5461-2. No public comments were received in response to this notice.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts will be provided to any respondents.

10. Assurance of Confidentiality Provided to Respondents

Information being requested in the Project Impact Assessment Survey (PIAS) is not considered confidential, therefore no additional safeguards are considered necessary beyond that customarily applied to routine government information. Grantees may provide contact information in the PIAS, and ANA will take reasonable precautions to keep the information private to the extent permitted by law. The PIAS 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 Project Impact Assessment Survey.

12. Estimates of Annualized Burden Hours and Costs

Annual Burden Estimates

Instrument	Number of Respondents	Number of Responses per Respondent	Avg. Burden Hours per Response	Total Burden Hours
ANA Project Impact Assessment Survey	85	1	6	510

Estimated Total Burden Hours: 510

The estimated reporting burden for each respondent includes the time spent on-site with ANA staff to complete the PIAS.

Annual Cost Estimates

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Project Director	PIAS – All Sections but the Financial Section	5	$24.00	$120.00
Finance Director	PIAS – Financial Section	1	$24.00	$24.00

Estimated Total Burden Costs: $144.00

The estimated annual cost burden is based on an average salary of $50,000 per annum for each position specified. During the on-site evaluations, ANA expects to discuss project results with community beneficiaries as well, but this will be on a strictly voluntary basis.

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

The estimated annualized capital 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 this information is expected to be $60,000. This amount is the total estimated travel costs for ANA staff to conduct the evaluation and complete the PIAS with 85 grantees at the site of their projects.

15. Explanation for Program Changes or Adjustments

The PIAS has been changed to a PDF format, and the numbering and organization has been simplified. ANA has also modified several questions to require evaluators to pre-fill information to the extent possible and verify it during the visit, reducing the on-site reporting burden on the grantees. Below is a list of changes to the PIAS, presented by section of the survey.

Cover Page and Supplemental Continuations, and Table of Activity Results

- Added comment boxes to write reasons for grant actions and application score prior to visit
- Removed questions (A402 and A403 on former PIAS) about staff positions
- Removed pre-visit information, and modified contact information to request less information
- Modified "Grant Type" into a drop down menu and renamed it to "Grant Sub-Category"

Objective Work Plan (Section 1)

- Removed questions on the usefulness of OWPs and OPRs (PIA-B301-B303 on former PIAS)
- Moved question on best practices (PIA 6.5.400 on former PIAS) to this section from the Results and Benefits section. The new number of the question is 1.2.

Project Results and Benefits (Re-numbered to Section 2)

- Added questions on volunteer contributions. New question numbers are 2.4.1-2.4.3.
- Deleted question on income generation (PIA-6.1.300 on former PIAS)
- Deleted question on developing formal sustainability plans (PIA – 6.5.100 on former PIAS)
- Relocated partnerships, leveraged resources, and problem statement questions from Project Impact section to this section
- Relocated codes/ordinances/regulations questions from Competitive Area Questions to this section

Community Involvement and Outreach (Section 3)

- Added question: "Is there anything you would have done differently in planning your project?" New question number is 3.1.5.
- Added questions on number of ongoing participants and individuals attending events/activities. Question numbers are 3.2.6-3.2.7.
- Added questions "How many children were involved in project implementation?" and "How many families were involved in project implementation?," numbers 3.2.4-3.2.5

- Removed requests to rank community involvement
- Removed questions about elder and youth involvement in project planning, PIA 3.401 and 3.501 on former PIAS
- Removed question on community misgivings, PIA 3.8 on former PIAS
- Clarified questions on community involvement in project planning, new question numbers are 3.1.2-3.1.3.

Project Impact (Re-numbered to Section 4)

- Added three year target and baseline measure for impact indicator to align with current ANA Funding Opportunity Announcement requirements, along with questions to assess how data was calculated. Question numbers are 4.1.1-4.1.4.
- Added question 4.2.1: "How many individuals were affected by the benefits of the project?"

New Section: Project Sustainability (Given Number of Section 5)

- Added question: "What has been put in place to sustain project benefits to the community?" Question number is 5.1.
- Added checkboxes for evaluator to select whether financial support, organizational capacity, and community support are in place
- Added question, number 5.2, to read "What are your next steps for continuing to provide project benefits to the community?"
- Added question, number 5.3, to read "What supports from ANA, other than additional funding, would help to sustain the project benefits?"
- Relocated sustainability questions from the Results and Benefits section to this section. Question numbers are now 5.1.3.1-5.1.3.2.

Challenges (Re-numbered to Section 6)

- Removed "Encountered Challenge" and "Expected Challenge" columns and modified third column to read "Comments"

Staffing (Re-numbered to Section 7)

- Added one question, with new number of 7.2.2: "Have you attended other ANA Post-Award trainings?"
- Combined questions PIA – 5.1.1.03-5.1.1.05 on former PIAS to read "How many different Project Directors served on this project?" New question number is 7.1.2.
- Improved formatting and organization of chart, and incorporated questions on consultants (PIA 5.1.2.01-5.1.2.03 on former PIAS) into chart.

Financial (Re-numbered to Section 8)

- Added a comment box for "Describe your process for tracking/managing the financial aspects of this project," question 8.1.
- Added questions for the Finance Director: "Did you find the Post-Award training helpful?" and "Do you have any recommendations for the training?" Question numbers are 8.6.1 and 8.6.2.
- Slightly revised question wording for clarity

Competitive Area Specific Questions (Re-numbered to Section 9)

- Re-titled "Family Preservation Projects" to "Strengthening Families and Fatherhood." Deleted question on single parents (PIA-8.404 on former PIAS) and added new questions:
    - How many fathers/male guardians participated in the project? Question 9.2.1.
    - How many foster children were placed with Native families during the project? Question 9.3.1.
    - How many Native foster parents were trained as a result of the project? Question 9.3.2.
    - How many Native foster parents were newly licensed during the project? Question 9.3.3.
- For Environmental Projects, condensed and combined existing questions, and added new questions:
    - Do you foresee any challenges working with other agencies, organizations, and/or tribes on resource management? Question 9.12.
    - What are your Tribe's/organization's training needs related to the management and/or regulation of environmental resources? Question 9.13.
    - Did you use EPA or other federal funds to meet your non-federal share for this grant? Question 9.14.
    - Does your Tribe/organization receive funding from EPA, US Forest Service, or US Fish and Wildlife? If yes, what is it used for? How does your ANA ERE grant fit in with this funding? Questions 9.15-9.15.1.
- For Language Projects, added:
    - A comment box to record the level of community language fluency prior to the project, number 9.8.2
    - A question to read "For EMI projects only: How did the project satisfy the parental involvement requirement?" Question number is 9.8.5.

Administrative Sections

- Removed ANA Services, Photo Release, and Contact Information Release forms from the survey

- Added assessment (Section 10) to be completed post-visit by the evaluator

16. Plans for Tabulation and Publication and Project Time Schedule

All ANA grants have a standardized completion date of September 29th. The PIAS information collection process will commence three months prior to this date and terminate within three months after this date. ANA staff will analyze the information thereafter, and author a comprehensive report to be sent to Congress, thereby fulfilling the congressional mandate that ANA "shall publish the results of evaluative research and summaries of evaluations of program and project impact and effectiveness not later than ninety days after the completion thereof. The Commissioner shall submit to the appropriate committees of the Congress copies of all such research studies and evaluation summaries." ANA will continue to submit this report to Congress 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. Collections of Information Employing Statistical Methods

The PIAS is a survey that is administered on-site with ANA grantees by an ANA evaluator. ANA does not intend to employ advanced statistical analysis to the data collected. Rather; the data will be used to provide ANA with a greater understanding of its portfolio, information on grantee successes and challenges, and descriptive data necessary to report on GPRA measures. This data will allow ANA to comply with its congressionally-mandated statute (42 United States Code 2991 et seq.) found under the section titled 'Evaluation' in the Native American Programs Act of 1974, as amended, which states that ANA will evaluate projects assisted through ANA grant dollars "including evaluations that describe and measure the impact of such projects, their effectiveness in achieving stated goals, their impact on related programs, and their structure and mechanisms for delivery of services."

As ANA's intent is not to employ advanced statistical methods to the data, questions 1-5 of this section are not applicable.