
SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS Senior Corps Progress Report (PPR)

A. Justification

A1. Need for Information Collection

The Senior Corps Progress Report (PPR) is an official reporting tool that requires grantees of the Senior Corps' programs (RSVP, Foster Grandparent and Senior Companion Programs) address and fulfill legislated program purposes; meet OMB Progress Report Requirements; meet agency program management and grant requirements; track and measure progress to benefit the local project and its contributions to senior volunteers and the community; and to report progress toward work plan objectives agreed upon in the granting of the award. The PPR also includes a Progress Report Supplement (PRS), which is administered annually to all Senior Corps grantees. This PRS survey collects data from all grantees that is then aggregated to develop snapshots about Senior Corps volunteers, such as demographic characteristics, reasons for separating from the program, and service hours per week. The PRS is unchanged from the currently approved and previous versions.

In Fiscal Year 2013, Senior Corps adopted new standard performance measures for its grantees. The revised Senior Corps Grant Application Instructions incorporated new standard national performance measures. The proposed, revised PPR will align with the new national performance measures, and allow grantees to enter actual data and progress towards plans and targets set in the Grant Application. In the 60 Day Notice, Senior Corps indicated its intention to change the frequency of the PPR submissions from annual to semi-annual.

The existing Senior Corps PPR is set to expire on August 31, 2013.

A2. Indicate how, by whom, and for what purpose the information is to be used.

Senior Corps grantees complete PPR and document progress toward accomplishing work plan goals and objectives, reporting volunteer and service outputs, reporting actual outputs and outcomes related to mandatory performance measures, documenting challenges encountered, describing significant activities, and requesting technical assistance. The PPR PRS survey is used annually to report demographic data related to the Senior Corps volunteers.

A3. Minimize Burden: Use of Improved Technology to Reduce Burden

The PPR is a component of the CNCS grants management system, eGrants. As an integrated module, it follows the current system configuration to integrate the PPR with the data entered by the grantees into the funded grant applications.

A4. Non-Duplication

There are no other sources of information by which CNCS can meet the purposes described in A2 (above).

A5. Minimizing for economic burden for small businesses or other small entities.

This collection of information does not impact small businesses because they are not eligible to apply for grants. There is no economic burden to any other small entities beyond the cost of staff time to collect and report the data. This is minimized to the degree possible by only asking for the information absolutely necessary to measure progress towards CNCS's strategic initiative benchmarks.

A6. Consequences of the collection if not conducted, conducted less frequently, as well as any technical or legal obstacles to reducing burden.

CNCS will be unable to document and report the results of grant funds awarded in the Senior Corps programs portfolio. CNCS will also be out of compliance with the OMB Circular requirements for grants and progress reports.

A7. Special circumstances that would cause information collection to be collected in a manner requiring respondents to report more often than quarterly; report in fewer than 30 days after receipt of the request; submit more than an original and two copies; retain records for more than three years; and other ways specified in the Instructions focused on statistical methods, confidentially, and proprietary trade secrets.

There are no special circumstances that would require the collection of information in any other ways specified.

A8. Provide copy and identify the date and page number of publication in the Federal Register of the Agency's notice. Summarize comments received and actions taken in response to comments. Specifically address comments received on cost and hour burden.

The 60 day *Notice* soliciting comments was published on Monday, December 10, 2012 on page 73453. A total of 41 individual commenters submitted 99 total comments about the Senior Corps PPR. Some commenters submitted more than one comment. The majority of the comments addressed concerns about increase in burden by changing the reporting from annual to semi-annual:

Summary of Comments by Category and CNCS Response:

Category 1: Statements of Support for a PPR Update: A total of 26 comments included statements of support for an updated PPR:

- 19 commenters support updating the PPR to align with new performance measures
- 7 commenters shared that the PPR is a valuable reporting tool

Response: CNCS agrees with the need to align the PPR with new performance measures and also the overall value of the PPR.

Category 2: Burden:

1) CNCS received 72 comments citing semi-annual reporting will increase reporting burden, and that CNCS should retain an annual reporting cycle.

- 19 comments stated that a semi-annual PPR would take too much time away from other project management responsibilities. Four of the 19 comments specifically noted that grantee time is needed to shift service activities to new National Performance Measures or to focus on RSVP Competition. Eight of the 19 comments noted that a Senior Corps project director's time and project management abilities are already stretched due to recent budget cuts which have resulted in reduced staff time and reduced travel budgets

Response: CNCS recognizes the time needed to support other Senior Corps project management responsibilities, and agree that requesting a full PPR every six months does not result in benefits that outweigh the additional administrative burden imposed. CNCS proposes the following refinements to semi-annual reporting:

- Only grantees that have adopted the new standard performance measures will be required to report semi-annually. These grantees comprise 33 percent of the Senior Corps portfolio in FY 2013; 66 percent in FY 2014; and 100 percent in FY 2015. The increase in percentage is due to the phased in approach of the required performance measures. In this way, grantees not yet operating under the performance measures requirements will retain their original annual reporting cycle until the time that they compete for a new grant (RSVP only) or submit a renewal for a new grant (FGP and SCP only).
- CNCS will require only demographic and performance measure output data reports on the mid-year PPR, rather than the full PPR. Completing only the sections that address the performance and results will provide the data needed by CNCS to gauge progress, but will abbreviate the mid-year PPR submission.

2) Lack of useful data to justify increase in burden: A total of 26 comments stated that a semi-annual PPR is unnecessary because performance measure data includes an annual target. Thus, a semi-annual report would not yield useful data. Eighteen of these comments stated that information reported on a semi-annual PPR would unfairly be used as a measure towards progress on achieving final targets. Two of the comments stated that commenters believed CNCS would not use the data reported

Response: CNCS recognizes that performance measure targets are a goal to be achieved at the end of a 12-month period. However, information reported on a semi-annual PPR provides information used to determine whether the project is on track to achieve the target on time. The data will be used to determine adequate progress during the project period to assess whether an administrative renewal or competition is the appropriate next step for RSVP projects. The data submitted at the mid-point each year will also allow CNCS to access data needed for key documents, such as the Congressional Budget Submission.

3) Burden on volunteer stations, which are the organizations where the volunteers are placed. A total of 15 comments expressed concern about an additional reporting burden on volunteer stations. One comment stated that the project would be at risk of losing volunteer stations due to an increased reporting burden. Two comments cited technology issues at the volunteer stations may present challenges to gathering reporting information from volunteer stations.

Response: CNCS recognizes the potential increase in volunteer station burden due to additional reporting. Rather than asking for a full PPR to be submitted every six months, CNCS will compromise with a requirement for only demographic and output information to be reported on the six month PPR.

Category 3: Time Estimate. A total of 9 comments stated that the estimated time to complete the PPR is too low.

Response: The time required to complete the PPR is limited to the time needed to enter the PPR information into the PPR module in eGrants and does not include the time invested in project management, performance measures monitoring, or gathering the performance measures and PPR data. However, we concur that the full burden should be reviewed, particularly since respondents will use new eGrants system functionality under this PPR version.

Category 4: CNCS Staff Oversight. A total of 2 comments stated that CNCS staff would not have time to react to and provide feedback on a semi-annual report

Response: Prior to the recent move to annual PPRs, CNCS staff provided feedback on semi-annual and annual PPRs. Time to provide feedback has not been an issue for CNCS staff in the past.

Category 5: Suggestion for Performance Metric for Achievement. One comment suggested that grantees self-report whether they are on target to achieve the end of year goal, rather than reporting quantifiable data against the performance measures.

Response: Data that cannot be supported with quantifiable information would not provide enough useful information for CNCS.

Category 6: Other. One commenter stated that Senior Corps is a waste of government money and recommends closing out Senior Corps grants and programs.

Response: This comment is outside the scope of the information request.

A9. Payment to Respondents

There are no payments or gifts to respondents

A10. Assurance of Confidentiality and its basis in statute, regulation, or agency policy.

Information provided by this collection will be held solely by grantees and CNCS staff.

A11. Sensitive Questions

The information collection does not include questions of a sensitive nature.

A12. Hour burden of the collection

We had originally estimated 20,000 total hours of burden associated with the PPR. The estimate was derived from a total of 1,250 respondents completing two full PPRs (for a total of 8 hours per respondent) and one PRS annually (for a total of 8 hours per respondent). Based on the comments, we have now revised the total hours and source of the burden hours as follows:

The new revised estimate is 17,500 hours annually. This estimate is based on 1,250 respondents completing one abbreviated PPR and one full PPR, and one PRS annually. The burden per submission is estimated at 4 hours per full PPR, 2 hours per abbreviated PPR, and 8 hours per PRS, for a total of 14 hours per respondent.

A13. Cost burden to the respondent

There is no cost burden to the respondent associated with this request.

A14. Cost to Government

There are no additional costs to the Government.

A15. Reasons for program changes or adjustments in burden or cost.

The burden adjustment is due to the proposed change in frequency of reporting from annual to semi-annual.

A16. Publication of results

Not applicable because the responses to this information collection will not be published.

A17. Explain the reason for seeking approval to not display the expiration date for OMB approval of the information collection.

Not applicable.

A18. Exceptions to the certification statement

There are no exceptions to the certification statement in the submitted ROCIS form.