

Supporting Statement for Alzheimer’s Disease Supportive Services Program Standardized Data Collection

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Alzheimer’s Disease Supportive Services Program Data Reporting Tool (ADSSP-DRT) is needed in order to:

- Comply with the reporting requirements in the Public Health Services Act (PHS);
- Collect data for performance measures used in the justification of the budget to Congress and by program, state and national decision makers.
- Effectively manage the Alzheimer’s Disease Supportive Service Program (formerly known as the Alzheimer’s Disease Demonstration Grants to the States) at the federal, state and local levels.
- Advocate at the federal and state levels for more effective and efficient supports and services for persons with Alzheimer’s disease and their caregivers.

The ADSSP Data Collection Reporting Tool (ADSSP-DRT) (OMB#0985-0022) was approved for June 7, 2010 through June 7, 2013. The ADSSP-DRT collects information about the delivery of supports and services by ADSSP state grantees, including basic demographic information about service recipients and spending on direct services and administrative expenses.

This request is to extend, with modifications, the use of the ADSSP-DRT from June 7, 2013 through June 7, 2016.

The current ADSSP-DRT (revised June 2010) is available at:

http://www.aoa.gov/AoARoot/AoA_Programs/HPW/Alz_Grants/docs/ADSSP_DataCollectionReportingForm.xls

The proposed ADSSP-DRT (revised June 2013) is available at:

http://www.aoa.gov/AoARoot/AoA_Programs/HPW/Alz_Grants/docs/ADSSP_DataCollectionReportingForm_proposed.xls

The Public Health Services Act (PHS) requires AoA to “provide for an evaluation of each demonstration project for which a grant is made” under the Alzheimer’s demonstration

projects. (Section 280c-5d).

To fulfill the evaluation requirements and allow for optimal federal and state-level management of the program, specific information identified in the statute must be collected from grantees, including the following:

- A. The number of persons with Alzheimer’s disease and/or their family caregivers served by the program and their respective demographic characteristics. Section 280c-3 (3) requires that grantees “improve access...to home or community-based services [for persons with Alzheimer’s disease and/or their family caregivers]... particularly those individuals who are members of racial or ethnic minority groups, who have limited proficiency in speaking the English language”.
- B. The provision of direct services to persons with Alzheimer’s disease and/or their family caregivers. Section 280c-3 (2) requires that “home health care, personal care, day care, companion services, short-term care in health facilities, and other respite care” be provided.
- C. Information about federal funds spent on direct services and administrative costs. Section 208c-5c requires that “no more than 10 percent of the grant will be expended for administrative expenses with respect to the grant” and Section 208c-3b requires that grantees “expend not less than 50 percent of the grant on the provision of [direct services]”, including those listed in Section 280c-3 (s) (i.e. home health care, personal care, day care, companion services, short-term care in health facilities, and other respite care).

The following changes of the currently approved ADSSP-DRT have been made:

1. From the Primary Caregiver Characteristics demographics sheet:
 - a. Added Age Missing field. ADSSP participants may refuse or forget to answer a demographic question, files are lost, or data are not recorded properly. This information is needed to appropriately evaluate the demographics of those served, including those with incomplete demographic data available.
2. From the Person with Dementia Characteristics demographics sheet:
 - a. Added Age Missing field. ADSSP participants may refuse or forget to answer a demographic question, files are lost, or data are not recorded properly. This information is needed to appropriately evaluate the demographics of those served, including those with incomplete demographic data available.
3. From the Services, Expenditures and Participation sheet:
 - a. Removed Total ADSSP Expenditures. This data is already included in the SF-425¹ reports submitted to the ACL Office of Grants.

¹ White House. Accessed May 8, 2013 from http://www.whitehouse.gov/sites/default/files/omb/assets/grants_forms/SF-425.pdf

- b. Removed Total Federal Funds Spent on Direct Services. This is not a required data element in the ADSSP legislation. The Percentage of Federal Funds Spent on Direct Services is required and already covered in this sheet.
- c. Removed Total Federal Funds Spent on Administrative Services. This is not a required data element in the ADSSP legislation. The Percentage of Federal Funds Spent on Administrative Services is required and already covered in this sheet.

2. Purpose and Use of the Information Collection

Information from the ADSSP-DRT will be provided to: federal and state legislators; state agencies on aging; national, state and local organizations with an interest in Alzheimer's disease and long-term care issues; current and future ADSSP grantees; and private citizens who request it. Information will be posted on AoA's website, as well as a technical assistance website maintained by an AoA contractor.

Information that has been collected with the current ADSSP-DRT to date has been used:

- By AoA, to advocate within the Department on specific issues affecting persons with Alzheimer's disease and/or their family caregivers, pin-point areas where technical assistance to the states is indicated, and prepare planning and reporting documents;
- By AoA, to identify those states that have had success in serving disparate populations and work with grantees to develop materials that enable current and future grantees to learn from and replicate these practices; and
- By AoA, state, and local level managers of aging programs to compare operation of their ADSSP programs to other states and advocate for more effective program structure and sustainable funding to embed these model supports and services into state systems

Examples of products developed through this data collection are available at:
<http://www.adrc-tae.org/tiki-index.php?page=AboutADSSP>

3. Use of Improved Information Technology and Burden Reduction

Grantees collect data using the approved ADSSP-DRT excel spreadsheets and submit the data to AoA. A web-based form allows grantees to enter data directly into a database. There are no user fees associated with the use of the tools and states will have the flexibility to determine how the data is entered and by whom. For example, some states may choose to have local sites enter the data at the community level, while others may prefer to enter the data at the state level. State data are aggregated and analyzed by AoA contractors and made available to the states and general public.

AoA is aware that different states have different capabilities in using web-based data forms. AoA will continue to work with ADSSP grantees to ensure easy access to the web-based form and provide regular training to ensure minimal burden. Current grantees have been trained in the use of the forms by an AoA contractor. Training is available on the reporting page of the ADSSP website for grantees to download and view at any time. Any new grantee will be directed to review the webinar online and will receive one to one technical assistance as needed.

4. Efforts to Identify Duplication and Use of Similar Information

All information in the currently approved data tool and proposed in this revision is unique to the ADSSP program grantees.

5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this study.

6. Consequences of Collecting the Information Less Frequently

ADSSP grantees will submit data semi-annually. To meet the statutory requirements and execute program management functions, availability of current data is critical. The average project period for current grantees is approximately 31 months. If data was only submitted annually or once throughout the project period, AoA would be unable to promptly identify grantees in need of technical assistance to reach their goals (numbers served, numbers of underserved populations reached, etc.) and identify grantees who are exceeding the spending limits (no more than 10% of federal funds spent on administration) and not achieving the direct service spending requirements (at least 50% of federal funds spent on direct service) that are required by law.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

None of the listed circumstances applies to this submission.

8. Comments in Response to the Federal Register Notice/Outside Consultation

A 60-day Federal Register Notice was published in the *Federal Register* on June 17, 2013, Vol. 78, No. 116; pp. 36192. [Sample post 60-day Notice addition: There was one public comment received pertaining to the categories for race. In the revised tool and supporting documents, the race and ethnicity categories were condensed into one category. The comment suggested that the revised tool retain race and ethnicity as two distinct categories, which is consistent with the OMB data collections. As a result, the tool was revised to separate the race and ethnicity categories and make them consistent with other AoA and OMB data collections.]

9. Explanation of any Payment/Gift to Respondents

Not applicable

10. Assurance of Confidentiality Provided to Respondents

Information provided for the ADSSP data collection requirement will be submitted in aggregate format, which means no individual or personal information will be transmitted. Confidentiality will not be compromised. Aggregate data will be used to inform: AoA, other federal agencies, Congress, state agencies on aging, ADSSP state grantees, and other relevant stakeholders about the progress being made and services provided through the ADSSP.

11. Justification for Sensitive Questions

The report does not include questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs (Total Hours & Wages)

12A. Estimated Annualized Burden Hours

The estimated hourly burden for this revised ADSSP-DRT is based on the number of persons served in the most recent ADSSP grantee data submission. At the end of FY 2013, there will be a total of 21 state-level grantees administering a total of 30 grants. Based on reports from a sample of ADSSP grants, there are approximately 2 local program sites per grant. ADSSP-DRT related data entry by local program sites requires an average of 11.6 hours of paid and volunteer time annually per local program site. This equates to a total of 696 hours total across the 30 grants (11.6 hours x 2 sites x 30 grants = 696 hours).

Based on reports from a sample of ADSSP grants, state grantees spend an average of 16 hours annually per grant gathering data from local program sites and submitting the data to AoA. Data is submitted to the state grantees from the local program sites and aggregated into the ADSSP-DRT. Grantees differ in their methods of collecting data from local sites. Some grantees have local sites report aggregate data using state-specific electronic data reporting systems; other grantees have local sites report aggregate data on the ADSSP-DRT. Regardless of collection method, grantees ensured that cumulative, aggregate data was submitted to AoA using the ADSSP-DRT.

A fair estimate for the average amount of state staff time spent gathering the local data, correcting mistakes, entering it into the ADSSP-DRT and submitting the report to AoA is 16 hours per grant. This equates to a total of 480 hours total across the 30 grants (16 hours x 30 grants = 480 hours).

Thus, the average time spent reporting for a single grant annually equals:
696 hours (local) + 480 hours (state) = 1176 hours; 1176 hours/30 grants = approximately

39 hours per grant.

Type of Respondent	Form Name	No. of Respondents	Frequency of Response	Average Time per Response (in hours)	Total Burden Hours (Annual)
Local Program Site	ADSSP-DRT	60	2	5.8	696
State Government	ADSSP-DRT	30	2	8	480
Total					1176

12B. Costs to Respondents

Documentation (local level)

5.8 hours x 2 (semi-annual reports) = 11.6 hours annually

11.6 hours annually x \$20.43 per hour = \$236.99 per grant annually. This estimate is based on the projected salary for a local government social service worker, according to the U.S. Bureau of Labor Statistics² (\$42,490 per year, divided by 52 weeks in a year, divided by 40 hour work week).

\$236.99 x 60 local sites = \$14,219.40 annually

Preparing ADSSP-DRT (state level)

8 hours x 2 (semi-annual reports) = 16

16 hours x \$27.40 per hour (average state salary reported among ADSSP state project directors) = \$438.40 per grant annually x 30 grants = \$13,152 annually

Type of Respondent	No. of Respondents	Total Annual Burden Hours Per Respondent	Hourly Wage Rate	Total Annual Cost Per Respondent	Total Annual Cost Per Grant
Data Entry by Local Site Staff	60	11.6	\$20.43	\$236.99	\$473.98

² U.S. Bureau of Labor Statistics (2013). Occupational Outlook Handbook, Accessed May 29, 2013 from <http://www.bls.gov/ooh/community-and-social-service/social-workers.htm>

ADSSP State Staff	30	16.00	\$27.40	\$438.00	\$438.40
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Total Annual Costs to All Respondents: \$14,219.40 (local) + \$13,152 (state) = \$27,371.40.

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

There are no other costs to respondents or record-keepers or capital costs.

14. Annualized Cost to the Federal Government

One GS 14-8 @ 2 percent time	\$2,580
Contract	\$25,720 ³
<i>TOTAL</i>	<i>\$28,300.00</i>

15. Explanation for Program Changes or Adjustments

The annual reporting burden hour estimates have decreased from 1410 hours to 1176.

The following reasons account for the change in burden hour estimates:

- The new estimates are for 30 grants, rather than the 47 grants from the previous ADSSP-DRT approval.
- Although, for the current data set, it was anticipated that grantee respondents would spend 15 hours reporting annually, the actual number of hours spent (local and state combined), as reported by the current ADSSP state grantees consulted, was 39 hours annually per grant
- It is likely that 39 hours annually is an over-estimate because several items included in the current tool are not included in the 2013 revised tool.

The following reasons account for the change in burden cost estimates:

- The new estimates are for 30 grants, rather than the 47 grants from the previous ADSSP-DRT approval.
- The annualized cost to the government increased due to increased contractor costs for: semi-annual trainings of grantees on the use of the ADSSP-DRT; maintenance of a web platform; and data analysis (including tabulation and creating reports), based on contractual amounts available for data support.

The annual reporting burden for grantees is expected to decrease over time as the number of active grants decreases. The number of new grants awarded decreased significantly

³ An AoA contractor provided this estimate, which includes the following tasks: semi-annual trainings of grantees on the use of the ADSSP-DRT; maintenance of a web platform; and data analysis (including tabulation and creating reports), based on contractual amounts available for data support.

over the last three years (21 in 2010, 4 in 2011, zero in 2012). The maximum number of grants awarded anticipated to be awarded in 2013 will not exceed 6. The number of new grants is subject to available funds and grant opportunity focus.

16. Plans for Tabulation and Publication and Project Time Schedule

Data will be due semi-annually and reviewed by an AoA contractor. If inconsistencies are noted grantees will be asked to correct and resubmit their reports. Once all reports are in and verified, the data will be aggregated and analyzed by the contractor. Based on previous data collections, this process will take three to four months. When the national data is finalized, the information will be posted on the ADSSP website, which is available to the public. The contractor will provide AoA and grantees access to the data in charts, graphs and other summaries depicting the national data and each state's data.

OMB approval for an additional three (3) years is requested.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable – display is not inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

B. Statistical Methods (used for collection of information employing statistical methods)

These collections do not employ statistical methods.