

SUPPORTING STATEMENT
FOR THE
ADMINISTRATION FOR NATIVE AMERICANS (ANA)
ON-GOING PROGRESS REPORT (OPR)

OMB No. 0970-0452

A. Justification

1. Circumstances Making the Collection of Information Necessary

Content changes are being made to the Objective Progress Report, now known as the On-going Progress Report (OPR) previously approved under information collection (OMB No. 0980-0204). ANA reduced and renumbered the OPR questions to allow for the collection of information necessary for the ongoing monitoring of grantee progress and performance of their grant award. The majority of information requested from the grantees is less than previous OPR versions and includes edits for clarification and simplification purposes.

The information in the OPR is collected on a semi-annual basis to monitor the performance of grantees and better gauge grantee progress. The semi-annual data collection replaces the previous quarterly filing requirement of the OPR.

The Objective Work Plan information collection is conducted in accordance with 42 USC of the Native American Programs Act of 1972, as amended. This collection is 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 Ongoing 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 Ongoing Progress Report (OPR) is submitted to ANA on a semi-annual 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 monitor grantee progress, identify grantees that may need training and/or technical assistance, and report quantifiable results to Congress.

Adjustments to Specific Sections of the OWP.

Results Expected and Benefits Expected:

These two data elements will now be combined into one data element to read as follows: Results and Benefits Expected. The applicant will still include the Criteria for Evaluating. This is an effort to simplify the information collected here.

Adjustments to Specific Sections of OPR.

Objective Work Plan Status Update

Question 1 was rephrased. Question 2 removes the term “Awarding Agency” and makes it specific to ANA. It also allows for the grantee to provide more narrative detail rather than a simple Yes/No to describe any changes needed to the work plan.

Question 3 remains the same, asking the grantee to complete the table to include all objectives, results, benefits, activities, dates as they appear in the OWP. However, the questions “Current Status of Expected Results” and “Current Status of Expected Benefits” have been combined read as “Current Status of Expected Results and Benefits”. In addition, previous references to quarterly reports, such as Quarter 1 (Q1), have been removed from the chart since the grantee is now reporting on a semi-annual basis.

Partnerships and Leveraged Resources:

Questions related to Partnerships and Leveraged Resources have been removed from the OPR since it is not necessary to collect this data for ongoing monitoring of a grantee’s progress. However, this information remains useful for other ANA data collection needs and will be asked in a separate form.

Impact indicator:

- a. Questions related to the Impact Indicator have been removed from the OPR since it is not necessary to collect this data for ongoing monitoring of a grantee’s progress. However, this information remains useful for other ANA data collection needs and will be asked in a separate form.

Native American Youth and Elder Opportunities

Questions related to Native American Youth and Elder Opportunities have been removed from the OPR since it is not necessary to collect this data for ongoing monitoring of a grantee’s progress. However, this information remains useful for other ANA data collection needs and will be asked in a separate form.

Staffing and Human Resources

These questions have been simplified to request the most pertinent information needed to understand the current staffing levels of the grantees. The questions have been enhanced for monitoring purposes.

Project Sustainability

Questions related to Project Sustainability have been removed from the OPR since it is not necessary to collect this data for ongoing monitoring of a grantee's progress. However, this information remains useful for other ANA data collection needs and will be asked in a separate form.

Financial

Questions 9 and 10 are new, related to program income. These questions will not pose additional burden to grantee because they also have to report this on the SF-425. However, the data collected will be useful for ongoing project monitoring.

Previously Assets for Independence (AFI), this section of the form will now read as Native Asset Building Initiative (NABI) Grants.

These questions are only to be answered by NABI grantees. These questions have been completely revised and are aligned to the performance indicators that are included in the NABI Funding Opportunity Announcement. The questions should not pose any additional burden on these grantees because they already collect this information. Four questions in the previous version of the form were removed.

3. Use of Improved Information Technology and Burden Reduction

Applicants are able to electronically submit the OWP through www.grants.gov. The OPR is an online form which grantees can complete electronically and submit in the GrantSolutions system, a Grants Management Center of Excellence managed by the Administration for Children and Families (ACF).

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 now only required to be collected on a semi-annual 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. 79, No. 131, page 38904, published on July 9, 2014. 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	2	1,000
OPR	275	2	1	550

				1,550
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Estimated Total Annual Burden Hours: 1,550

The dollar equivalent would be \$0 X 1,550 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

The following are changes to specific sections of the OWP.

Results Expected and Benefits Expected

These two data elements will now be combined into one data element to read as follows: Results and Benefits Expected. The applicant will still include the Criteria for Evaluating. This is an effort to simplify the information collected here.

The following are changes to specific sections of the OPR.

Changes to the OPR form were made to allow for ease in completion of the form. The questions have been re-organized and re-numbered 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. Some questions were removed because they did not relate to ongoing monitoring but other ANA data collection needs. Also, questions were rephrased for clarification purposes without any additional requests to the primary content.

Objective Work Plan Update: Content is the same. ANA consolidated the current status of expected results and the current status of expected benefits into one question. This will match ANA’s revised OWP.

The following sections have been removed from the OPR and will be part of an anticipated separate collection that will only be collected on an annual basis by grantees. These sections are known as:

- Partnerships and Leverage Resources
- Impact Indicator
- Native American Youth and Elder Opportunities
- Project Sustainability

Staffing: Content is essentially the same but the questions are reworded and renumbered. New columns were added to the table to ask how the position is funded and if the position is filled by a Native American.

Challenges: Content is essentially the same but the questions are reworded and renumbered.

Financial: The information requested in this section is similar to those in the previous OPR with a few additions. Questions 9 and 10 are new, related to program income. These questions will not pose additional burden to grantee because they also have to report this on the SF-425. However, the data collected will be useful for ongoing project monitoring.

Native Asset Building Initiative, previously listed as Assets for Independence (AFI): These questions have been revised to reflect the current data requested in the Funding Opportunity Announcement for this program. Only grantees with a NABI grant award are required to complete this section of the form. There are now a total of 7 questions related the AFI portion of the grant award.

16. Plans for Tabulation and Publication and Project Time Schedule

The OWP form will be made available on Grants.gov and the ACF Grants webpage. 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.