SUPPORTING STATEMENT FOR THE ADMINISTRATION FOR NATIVE AMERICANS (ANA) ANNUAL DATA REPORT (ADR)

OMB No. XXXX-XXXX

A. Justification

1. Circumstances Making the Collection of Information Necessary

Content changes are being made to the Objective Progress Report, now known as the Annual Data Report (ADR) previously approved under information collection OMB No. 0980-0204. ANA reduced and renumbered the ADR 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 ADR versions and includes edits for clarification and simplification purposes.

The information in the ADR is collected on an annual basis to monitor the performance of grantees and better gauge grantee progress. The Annual Data Report replaces the previous quarterly filing requirement of the OPR.

The Annual Data 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 Annual Data Report (ADR) is submitted to ANA on an 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 ADR.

Objective Work Plan Status Update

The Objective Work Plan questions 1 and 2 have been removed from the ADR since it is not necessary to collect this data for review of outcomes and benefits of the grant. However, this information remains useful for other ANA ongoing monitoring of a grantee's progress and is being asked for in a separate form.

Partnerships and Leveraged Resources

Questions related to Leveraged Resources have been removed from the ADR since ANA determined it is not necessary to collect this data.

Questions related to Partnerships have been streamlined to list the name of the partner, indicate whether the partnership is new or pre-existing the type of partner and what resource did the partnership contribute to the project. ANA has determined that it will not review when the partnership was formed, and therefor data will not be collected.

Impact indicator

The Impact Indicator section was streamlined and consolidated to reduce the burden on the grantee and clarify exactly what is being asked for by the Administration for Native Americans. The question related to the extent to which the impact indicator was achieved was removed.

Native American Youth and Elder Opportunities

Questions related to intergenerational activities have been removed from Native American Youth and Elder Opportunities of the ADR since it is not necessary to collect this data. The data collection tables were streamlined to only ask for information that ANA will review.

ANA added two questions about if the activities promoted youth and elders in cultural preservation and/or youth leadership development activities.

Staffing and Human Resources

Questions related to Staffing and Resources have been removed from the ADR since it is not necessary to collect this data for performance of grantees and better gauge grantee progress. However, this information remains useful for other ANA data collection needs and will be asked in a separate form.

Challenges

Questions related to Challenges have been removed from the ADC since it is not necessary to collect this data for performance of grantees and better gauge grantee progress. However, this information remains useful for other ANA data collection needs and will be asked in a separate form.

Community Involvement and Participation in the Project

ANA added this section to track the number of volunteers, hours contributed to the project and what contribution they had on the project. Further ANA is interested in the level of community participation they actually had versus the projected involvement as detailed in their application and added a question regarding community participation to this data collection.

Use of On-going Project Data

In an effort to increase capacity of ANA grantees, ANA added questions to this data collection on how project information (data) is used to improve the implementation of the project. The grantee is required to list results and Benefits in the OWP and therefor, ANA is asking to have the grantee report on the measurement and outcomes of those results and benefits as well as if they obtained community feedback on project progress.

Project Benefits

ANA has added questions to this data collection for information on any business created, jobs training, regulations or ordinances developed or any materials or resources developed.

Financial information was streamlined to collect data on whether the project has secured funds to sustain the project and if not, would they want ANA support in developing a plan.

Other financial information as part of ongoing monitoring of a grantee's progress remains useful for other ANA data collection needs and will be asked in a separate form.

Project Sustainability

Questions related to project sustainability have been relocated to Project Benefits and streamlined.

Financial

Questions related to financial information have been relocated to Project Benefits and streamlined. However, more detailed information remains useful for other ANA data collection needs and will be asked in a separate form.

Lessons Learned and Additional Support

A question related to any lessons learned, promising practices or obstacles overcame and what support or resources ANA can provide was added to this data collection. ANA can use this information to improve services to grantees.

Assets for Independence (AFI)

Questions related to the Assets for Independence or Native Asset Building Initiative (NABI) were removed from the ADR since it is not necessary to collect this data for review of outcomes and benefits of the grant. However, this information remains useful for other ANA ongoing monitoring of a grantee's progress and is being asked for in a separate form.

Language Projects

ANA has added questions to the information collection to gain data on the language that ANA language projects are preserving or restoring, what activities they are conducting to preserve or restore the language, if they are teaching classes how they are measuring language acquisition and any teacher training or certification.

Esther Martinez Immersion (EMI)

ANA as added a question to this data collection to identify which type of three possible EMI projects the grantee is operating under.

Environmental Regulatory Enhancement (ERE)

ANA has added questions to the information collection to gain information on what types of baseline data the project might have collected, data monitoring environmental conditions and how the project has increased capacity to manage the environmental conditions on its lands.

Beneficiaries

ANA has added questions to the information collection to gain data on the beneficiaries of the project and what the benefits were attained. This is only asked at the end of the grant period.

Objective Work Plan – Final Summary

This section of the data collection asks for the grantee to summarize the results and benefits that were achieved for each objective. This is only asked at the end of the grant period.

Problem Statement and Project Goal

ANA has added questions to the information collection to gain data on the extent to which the grantee has achieved the original goal of the project. This is only asked at the end of the grant period.

Project Development

ANA has added questions to the information collection to ask who wrote the grant application. This is only asked at the end of the grant period.

Community and External Data

ANA has added questions to the information collection to gain data on what changed in either the organization and/or community as a result of the project and if the project gained any feedback from the community. This is only asked at the end of the grant period.

Continuation/Sustainability of Project Goals, Results, and Efforts

In addition to asking about finances in place to sustain the project, ANA has expanded the sustainability section of the ADR to collect data on promising practices, lessons learned and how the project has disseminated successes or publicized the project activities. Additionally, this data collection will gain information on what ANA services the grantee is interested in pursuing in the future. This is only asked at the end of the grant period.

3. Use of Improved Information Technology and Burden Reduction

The ADR is a fillable adobe form that will be submitted directly to ANA via email.

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 ADR is only required to be collected on an annual basis in order to effectively monitor ANA project progress. Reducing the frequency of the ADR 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. 80, No. 162, page 50855, published on August 21, 2015. 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 ADR 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 ADRs, such as community meeting attendance lists that include contact information. ANA will take reasonable precautions to keep information contained in the ADR private to the extent permitted by law. The ADRs 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 ADR.

12. Estimates of Annualized Burden Hours and Costs

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

		NUMBER OF	AVERAGE	TOTAL
		RESPONSES	BURDEN	BURDEN
	NUMBER OF	PER	HOURS PER	HOURS
INSTRUMENT	RESPONDENTS	RESPONDENT	RESPONSE	
ADR	275	1	1	275

Estimated Total Annual Burden Hours: 275

The dollar equivalent would be \$50 X 275 hours or \$13,750.

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

Adjustments to the ADR form were made to allow for ease in completion of the reporting forms. 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, some questions were removed because they are not necessary to collect this data for review of outcomes and benefits of the grant, but other ANA data collection needs or not at all. Also, questions were rephrased for clarification purposes without any additional requests to the primary content.

The following sections have been removed from the ADR 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:

- Staffing
- Challenges
- Financial
- Native Asset Building Initiative, previously listed as Assets for Independence (AFI)

16. Plans for Tabulation and Publication and Project Time Schedule

OPRs 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.