

THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

This annotated electronic version of the OMB outline for a Supporting Statement has been prepared by the ACF, Office of Planning, Research and Evaluation (OPRE), to assist in the preparation of a request for clearance of an information collection. This template can be downloaded from the PRA E-Office information collection web site.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

THE SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

The information collected by the Project Outcome Assessment Survey (POAS) 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 assess one-third of its grant portfolio each year to meet the assigned mandate. This mandate eliminates the need to use sampling methods as all ANA projects will be evaluated over a three-year period.

2. Purpose and Use of the Information Collection

The information collected in the POAS 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 their congressionally-mandated statute.

The information collected in the POAS 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 its 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 POAS will be completed on-site with the grantee. The on-site process will allow ANA to verify planned project deliverables and will also ensure a respondent rate of 100%. The POAS has been developed in personal document format (PDF), which will allow ANA to easily extract data and perform subsequent analysis.

4. Efforts to Identify Duplication and Use of Similar Information

ANA has reviewed existing information collection instruments and has determined that there are no existing forms which 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

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 POAS 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 December 24, 2015, vol. 80, p.80363 and no comments were received.

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

12. Estimates of Annualized Burden Hours and Costs

Annual Burden Estimates

Instrument	Number of Respondents	Number of Responses per	Avg. Burden Hours per	Total Burden Hours
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		Respondent	Response	
ANA Project Outcome 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 POAS.

Annual Cost Estimates

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Project Director	POAS	6	\$24.00	\$144.00

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 POAS with 85 grantees at the site of their projects.

15. Explanation for Program Changes or Adjustments

Adjustments to the POAS form were made to allow for ease in completion of the end of project survey. This information collection compliments the Annual Data Report (ADR) (OMB CN: 0970-0475). Questions in the POAS were eliminated, re-organized and re-numbered to consolidate questions that relate to the same theme in sections of the ADR. For example, some questions were removed because they are not necessary to collect this data collection such as leveraged resources. Also, questions were rephrased for clarification purposes with few additional requests to the primary content. As questions have been eliminated, there should be no considerable increase in burden to the grantee.

The following sections have been added to the POAS as those projects are now ending and ANA needs to collect data from them. Those are sections are:

- Sustainable Employment and Economic Development Strategies (SEEDS)
- Native Asset Building Initiative (NABI)

16. Plans for Tabulation and Publication and Project Time Schedule

All ANA grants have a standardized completion date of July 31 or September 29th. The POAS 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 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. Statistical Methods (used for collection of information employing statistical methods)

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

1. Respondent Universe and Sampling Methods

Respondents are ANA applicants/grantees. Sampling methods are not applicable with this collection activity. The POAS is required to be completed by grantees at the end of the project period in order to review of outcomes and benefits of ANA projects as required by 42 United States Code 2991 et seq..

2. Procedures for the Collection of Information

The POAS is a form that is only required by those applicants who received ANA grant awards. The POAS is a fillable adobe form that will be submitted directly to ANA via email and reviewed with ANA staff during an on-site visit. Information collected from the OWP is keyed into a database by ANA staff from which annual reports are generated.

3. Methods to Maximize Response Rates and Deal with Nonresponse

ANA maximizes the response rate by requiring selected grantees to complete the POAS at the end of the project; thereby ensuring response rates are maximized.

4. Test of Procedures or Methods to be Undertaken

ANA's data collection procedures and use of the POAS (previously known as the Project Impact Assessment Survey OMB CN: 0970-0379) over the last 7 years have had satisfactory results. Therefore, testing will not be necessary.

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

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