

The Supporting Statement for Data Collection Request Package
Assets for Independence (AFI) Performance Progress Report (PPR)

April 1, 2016

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Introduction

Assets for Independence (AFI) is a federal discretionary grant program administered by the Office of Community Services (OCS) in the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services (HHS). The AFI program enables eligible organizations to implement and demonstrate an assets-based approach for supporting low-income individuals and their families.

AFI is authorized to award grants to the following categories of entities:

- Non-profit organizations with 501(c)(3) status;
- State, local, and tribal government agencies applying jointly with a 501(c)(3) non-profit; and
- Financial institutions that are federally certified as either a Low-Income Credit Union or a Community Development Financial Institution and that demonstrate a collaborative relationship with a local community-based organization whose activities are designed to address poverty in the community and the needs of community members for economic independence and stability.

AFI grantees enroll participants to save earned income in special-purpose, matched savings accounts called Individual Development Accounts (IDAs). Every dollar of earned income that a participant deposits into an AFI IDA is matched (from \$1 to \$8 in combined federal and non-federal funds) by the AFI project, promoting savings and enabling participants to acquire a lasting asset. AFI participants use their IDAs and matching funds for one of three allowable assets: to purchase a first home; to capitalize a business; or to fund postsecondary education or training.

In this document, we request OMB clearance for AFI program-specific Performance Progress Report (PPR) data collection instruments. The AFI PPR will replace two reports: 1) the semiannual Standard Form Performance Progress Report (SF-PPR) and 2) the annual data report. By combining the SF-PPR and the annual data report into the new AFI PPR, OCS will streamline the programmatic reporting process for grantees. The SF-PPR is currently collected semiannually in GrantSolutions and used in conjunction with regular grantee calls with to provide OCS with information on the performance of AFI grants. However, the SF-PPR is very general and does not allow for the collection of specific performance indicators for the AFI program. The annual data report has been collected for each fiscal year in the past to provide detailed data on AFI grant performance, project characteristics, and participant traits that is reported in the annual AFI Report to Congress, but this collection did not have an OMB control number. Fiscal year (FY) 2014 was the last year of data collected using the annual data report, and OCS is now seeking OMB approval to ensure that we are in compliance with the Paperwork Reduction Act (PRA) going forward.

In order to minimize the burden on grantee organizations while still meeting the need for OCS to monitor grant performance throughout the year, we are requesting approval for two forms under the AFI PPR, a Long Form and a Short Form. With these two forms, we propose quarterly data collection: three collections per year using the abbreviated Short Form and one collection using the Long Form. Having recent performance data is critical for OCS's support of grantees

through training and technical assistance and for informing the multiple AFI program application review and funding decision processes each year.

Part A. Justification

1. Circumstances Making the Collection of Information Necessary

OCS is committed to being responsible stewards of federal dollars, and we are also committed to working with our grantees to ensure that the critical services that they provide to the low-income individuals and families in their communities are meaningful, high-quality, and effective. Strong grant performance data is critical to both of these priorities. The data from the AFI PPR will support OCS's goals of improving both AFI program monitoring and grantee performance. The standardized reporting format will ensure that accurate grant data is received in a timely, relevant way.

Additionally, the AFI authorizing statute includes annual report requirements both for AFI projects and for OCS on the AFI program overall. The AFI Act (Title IV of the Community Opportunities, Accountability, and Training and Educational Services Act of 1998, as amended, Pub.L. 105-285, [42 U.S.C. § 604 note]) states:

“Each qualified entity under this title shall prepare an annual report on the progress of the demonstration project. Each report shall include both program and participant information and shall specify for the period covered by the report the following information:

- (1) The number and characteristics of individuals making a deposit into an individual development account.
- (2) The amounts in the Reserve Fund established with respect to the project.
- (3) The amounts deposited in the individual development accounts.
- (4) The amounts withdrawn from the individual development accounts and the purposes for which such amounts were withdrawn.
- (5) The balances remaining in the individual development accounts.
- (6) The savings account characteristics (such as threshold amounts and match rates) required to stimulate participation in the demonstration project, and how such characteristics vary among different populations or communities.
- (7) What service configuration of the qualified entity (such as configurations relating to peer support, structured planning exercises, mentoring, and case management) increased the rate and consistency of participation in the demonstration project and how such configurations varied among different populations or communities.
- (8) Such other information as the Secretary may require to evaluate the demonstration projects.”

Section 414 of the AFI Act outlines information OCS must report to Congress regarding the AFI program, including:

- The savings rates of individuals in the demonstration project based on demographic characteristics including gender, age, family size, race or ethnic background, and income.
- The effects of individual development accounts on savings rates, homeownership, level of postsecondary education attained, and self-employment, and how such effects

vary among different populations or communities.

2. Purpose and Use of the Information Collection

The primary purpose of the AFI PPR is to collect data on all active AFI grants in a uniform, efficient, and systematic manner. The data collected in the AFI PPR is categorized by project information and administration; IDA design; saver account activity; training, services, and assistance offered; participant demographics at the time of enrollment; and participant demographics at the time of matched withdrawal. Broadly, the AFI PPR will help OCS fulfill its purpose as the administrator of the AFI program, including oversight of AFI grants and the services for low-income individuals funded by these grants.

Annual AFI Report to Congress. As mentioned above, one critical use of the data that will be collected in the AFI PPR is for the annual AFI Report to Congress. The report provides Congress with a yearly record of AFI projects, including descriptions of the IDA design characteristics, supportive services that they offer, IDA holder demographics, and information on matched withdrawals for asset purchases. These quantitative and qualitative data on the program-level outputs offer Congress and other stakeholders valuable information on the performance of the AFI program.

Performance Measures for the President's Budget. Another key use of the AFI PPR data is for the formulation of the AFI program performance measures reported annually in the President's Budget. Annual performance measures 13A and 13B are two components of one outcome measure developed in coordination with AFI grantees. Annual measure 13A is the amount of savings (earned income) participants withdraw from their IDAs for purchase of any of the three allowable assets (i.e., first home, small business, or postsecondary education) during the reporting period. This measure is expressed as the dollar amount withdrawn during one fiscal year. Annual measure 13B tracks the number of participants who withdraw IDA funds to purchase these assets during the reporting period. The results of annual measures 13A and 13B are framed by the number of eligible applicants enrolled and participant savings levels, which all take place over a five-year period.

Project Assessment and Monitoring. In support of our commitment to project oversight, OCS has developed several tools and dashboards in recent years to facilitate our ability to assess grant performance. Data from the AFI PPR will be incorporated both into dashboards designed to make it easier to monitor grant performance in an on-going manner throughout the year and into an assessment tool that will be used regularly to determine which AFI grantees are the highest priority for grant monitoring reviews. Having quarterly updates on key data elements will allow for early identification of warning signs and grantee challenges, enabling OCS to address any performance issues at a stage when they can be resolved more easily.

Training and Technical Assistance. The primary resource OCS has to address AFI grantee performance issues is training and technical assistance. OCS will use the AFI PPR data to inform both the targeting and content of training and technical assistance for grantees.

3. Use of Improved Information Technology and Burden Reduction

Grantees will submit AFI PPR data to OCS through an online reporting system—the ACF Online Data Collection System (OLDC). OLDC is a web-based reporting system that can be accessed by grantees and federal staff from anywhere with an internet connection. It was specifically designed to allow HHS grantees to submit grant forms and other data over the internet.

OLDC programmers will build the AFI PPR forms according to OCS's specifications, allowing us to incorporate time-saving features. For example, OLDC allows respondents to copy a row, which enables OCS to create a form that is streamlined for projects that have only one IDA design but that can also accommodate all of the data from projects that offer multiple IDA designs. OLDC also allows skips, eliminating the need for respondents to scroll past questions that are not relevant to them or, worse, taking the time to answer questions that are not relevant to them. Finally, OCS will pre-populate data whenever possible and incorporate auto-calculation as appropriate in order to minimize grantee burden and prevent errors. OLDC will also enable federal staff to access data easily and track the submission, review, and acceptance of reports.

OLDC will be a new system for many AFI grantees, so OCS is planning to provide robust training and support on using the OLDC system and on the overall transition to the AFI PPR.

4. Efforts to Identify Duplication and Use of Similar Information

The ACF Office of Planning, Research, and Evaluation (OPRE) has OMB approval to collect information for a 36-month evaluation of the AFI program through 2017. This evaluation seeks to determine the long-term impact of the AFI program as implemented in two AFI sites. The evaluation does not collect data from all AFI projects. Duplication is minimal between these information collections. While essential data, the OPRE collection does not fulfill the same purposes as the AFI PPR and it cannot be modified to meet these purposes.

5. Impact on Small Businesses or Other Small Entities

Some AFI grantees are small entities, therefore the AFI PPR will have an impact on those organizations. The AFI PPR has been designed to ensure that the information being requested is held to that which is necessary to meet our statutory obligations and to ensure accurate performance data.

6. Consequences of Collecting the Information Less Frequently

Consistent and timely reporting is necessary in order to track grant progress over the five-year project period. Because AFI program participants often need to save for more than a year, it is critical that AFI projects use the five-year project period efficiently. Without quarterly updates on key data elements, OCS would learn about grant performance issues after six months or more has passed, perhaps impacting many participants or potential participants that interact with the AFI project during that time. Training and technical assistance would be delayed, and it may be more difficult to resolve the issues if they have become entrenched.

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

This data collection fully complies with the guidelines of 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The first Notice, as required by 5 CFR 1320.8 (d), was published in the Federal Register (80 FR 28620) on May 19, 2015

(<https://www.federalregister.gov/articles/2015/05/19/2015-12096/proposed-information-collection-activity-comment-request>). ACF and OCS solicited public comment on the proposed collection. Public comments were due by July 18, 2015. This Notice was also shared with all current grantees via email and information on the proposed AFI PPR was posted to the AFI Resource Center website at <http://idaresources.acf.hhs.gov/page?pageid=a04700000VjdWe>.

On July 6th, 2015, OCS hosted a virtual Tribal Consultation to solicit feedback on the AFI PPR. A transcript of the consultation and a summary report are available at <http://www.acf.hhs.gov/programs/ocs/resource/afi-tribal-consultation-report>.

In response to the 60-day Notice, OCS received comments from six individuals/organizations, which were broken down into 62 specific comments. OCS organized the comments in a spreadsheet, considered each comment, and recorded the action taken to resolve each comment.

Concerns raised by commenters and the OCS response to each are described by category below:

- A. Formatting and consistency of the data collection:** OCS received several comments about how formatting and consistency could reduce the time burden of the collection instrument. In order to address these comments OCS revised the AFI PPR to include a uniform order when referring to AFI asset types, a standard format when requesting dates, the removal of a duplicate question, and a standard format for collecting information about asset-specific education and other services offered to AFI IDA holders.
- B. Instructions on completing the AFI PPR and the meaning of key words:** Comments expressed concern from grantees that were unsure how to complete the forms correctly. To address these concerns, OCS used more specific terms, edited the instructions to include additional context when comments mentioned that terms were unclear, and used terms consistently throughout. As mentioned above, OCS plans to offer training and technical assistance to grantees if the AFI PPR is approved in order to facilitate and ease the data collection process.
- C. Data that is not currently kept and data that presents a burden:** Respondents expressed a desire for certain data about their grant(s) to auto-populate, concern about data that grantees are not currently collecting, and commented about the time involved in reporting the data. OCS will auto-populate data whenever possible; reducing the time it takes grantees to complete the AFI PPR has been at the forefront of this process. While we acknowledge that there are new data collection items, these new items were added to ensure that we are collecting data required by the AFI Act and in response to questions routinely asked by the public and Congress. In order to minimize the impact and stress that these new items have on grantees, OCS plans on a phased approach for collecting these data. If OMB approval is granted, OCS will first implement the AFI PPR with these data as optional, allowing any grantees that have been collecting the data to report it but allowing those grantees that have not been collecting it to skip those fields initially. Following OMB approval, OCS will train grantees on the new requirements and provide assistance to ensure that they can begin collecting these data. Eventually, these data will

be required. We believe that this phase-in approach will provides adequate time for grantees to integrate new questions into their existing data collection tools with minimal disruption.

9. Explanation of Any Payment or Gift to Respondents

The information collection does not involve any payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collection does not require an assurance of confidentiality.

11. Justification for Sensitive Questions

The information collection does not include sensitive questions. All participant data is collected in aggregate form at the project level.

12. Estimates of Annualized Burden Hours and Costs

Table 1. Annual Burden Estimate

| Form Name | Number of Responses | Number of Responses Per Respondent | Average Burden Hours Per Response | Total Burden Hours |
|-------------------------------|---------------------|------------------------------------|-----------------------------------|--------------------|
| AFI PPR Short Form | 300 | 3 | 0.5 | 450 |
| AFI PPR Long Form | 300 | 1 | 3.8 | 1,140 |
| Estimated Annual Burden Hours | ... | ... | ... | 1,590 |

Table 2. Annual Cost Estimate

| Form Name | Total Burden Hours | Estimated Hourly Wage* | Total Cost |
|-----------------------|--------------------|------------------------|-------------|
| AFI PPR Short Form | 450 | 55.85 | \$25,132.50 |
| AFI PPR Long Form | 1,140 | 55.85 | \$63,669.00 |
| Estimated Burden Cost | ... | ... | \$88,801.50 |

*Source: Department of Labor; U.S. Bureau of Labor Statistics and Payscale.com. Includes fringe benefits.

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

The information collection does not involve additional annual direct costs to respondents, beyond the burden described under item 12.

14. Annualized Cost to the Federal Government

The annualized cost to the federal government for this data collection is \$77,986.50.

| AFI PPR Short Form | AFI PPR Long Form | Other costs |
|--|---|--|
| \$19,867.50 total | \$13,245 total | \$44,874 |
| Breakdown: <ul style="list-style-type: none"> • 300 grants • 0.5 hours per review, 3 collections per year • \$44.15 hourly wage of a GS-13, Step 1 for the locality of Washington, DC (high estimate of labor cost) | Breakdown: <ul style="list-style-type: none"> • 300 grants • 1.5 hours per review, 1 collection per year • \$44.15 hourly wage of a GS-13, Step 1 for the locality of Washington, DC (high estimate of labor cost) | Estimated costs for training and technical assistance for grantees, data collection assistance, and data analysis. |

15. Explanation for Program Changes or Adjustments

This is a request to become compliant with the Paperwork Reduction Act, so there are no program changes or adjustments to an existing data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

As discussed above, the AFI PPR will be submitted by grantees through OLDC. OCS will conform to the OMB standard quarterly reporting deadlines for the AFI PPR Short Form, requiring grantees to submit the Short Form on January 30, April 30, and July 30 each year of their grant. The AFI Act allows grantees 60 days after the end of each project year to submit their annual progress reports, so OCS is setting the deadline for the AFI PPR Long Form 60 days after the end of the federal fiscal year: November 30. When OCS was collecting the annual data report, it was due on December 1st each year, so this timeframe is very similar to what grantees were accustomed to.

As mentioned above, OCS has not yet collected FY 2015 data from AFI projects; ideally that data would have been collected in November 2015, however, OCS had not yet submitted the AFI PPR to OMB for approval at that time. Given this, OCS plans to collect FY 2015 data using the AFI PPR Long Form as soon as possible after OMB approval is granted. We are estimating that this would be in late summer of 2016, and we plan to prepare grantees for this collection while OMB is reviewing this request. Following the FY 2015 data collection, we will transition to working with grantees to prepare for submitting the AFI PPR Long Form for the FY 2016 data, due November 30, 2016, with no intermediary Short Form submission. FY 2017 would be the first year of the regular AFI PPR quarterly submission schedule.

The AFI PPR data will be tabulated and analyzed for the annual AFI Reports to Congress and the AFI portion of the annual President’s Budget, both of which are published following review and clearance. Under our estimated timeline, OCS expects to publish the FY 2015 AFI Report to Congress in early 2017 and the FY 2016 AFI Report to Congress in late 2017. The FY 2017 Budget included AFI program data from FY 2014 and OCS intends to include FY 2015 data in the FY 2018 Budget, if OCS receives approval for the AFI PPR.

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

OCS will clearly display the OMB approval number, expiration date, and other required information in the OLDC system on the information collection forms.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

OCS is not seeking an exception to certification for this data collection.

Part B. Statistical Methods

Not applicable.