

A. Justification

**1. Circumstances Making the Collection of Information Necessary**

The Older Americans Act (OAA), P.L. 89-73, enacted July 14, 1965, last amended in April 2016, P.L. 114-144, requires the Department to submit an annual report to Congress on the performance of Older Americans Act funded projects. (42 U.S.C. 3012).

This is a request for Office of Management and Budget (OMB) approval of the Administration for Community Living's (ACL) Administration on Aging (AoA) Title VI performance data. These proposed revisions will replace the currently approved Title VI program performance report under OMB 0985-0007 by collection year 2020; therefore the currently approved 0985-0007 is concurrently undergoing PRA clearance as an extension for usage after the expiration of April 30, 2019.

These data collection materials have been updated to better align with comparable data collected for ACL's other nutritional, supportive, and caregiving grants. Proposed changes in this request also include adding data components and updating others for more accurate reporting of persons served and activities provided through the Title VI-funded programs. The revised data collection will provide data necessary to determine the effectiveness of the program. Some examples of these changes are updating definitions in Title VI to be more in line with Title III, asking for unduplicated numbers of people served for different services and the number of hours spent providing said services. Additionally, the caregiver portion of the PPR has been updated to collect more information around types of caregivers served and unduplicated numbers of caregivers. Another element added has to do with information on expenditures.

Measures as required by Congress and the Government Performance Results Modernization Act of 2010 (GPRAMA), are also supported in ACL tracking performance outcomes and efficiency measures with respect to the annual and long-term performance targets established in compliance GPRAMA.

**2. Purpose and Use of Information Collection**

The information submitted by Older Americans Act (OAA) Title VI grantees is AoA's principle source of information on programs and services funded under the (OAA). The Program Performance Report (PPR) serves as the Program Performance Report for grantees to meet their annual grantee reporting requirements and includes the data required by the OAA to be reported in the AoA Annual Report to Congress. The data collection is summary data of services for seniors and family caregivers provided or managed by American Indian, Alaskan Native, and Native Hawaiian organizations. Data is submitted annually by all Title VI grantees. It includes information on the number of people served, the number of units of specific services, expenditures, and number of staff.

Data from the PPR are the primary source for performance measures in the Congressional budget justification; the HHS Annual Performance Plan and Report as well as the Annual Report to Congress referred to above.

AoA also uses the data to respond to inquiries from stakeholders, the public, and the press as well as program and policy decision makers.

Information from the most recent PPR is available on-line on the Aging Integrated Database (AGID) website (<http://www.agid.acl.gov/>). Results are available annually.

### **3. Use of Improved Information Technology and Burden Reduction**

Grantees are required to submit data electronically via an on-line internet based secure server.

### **4. Efforts to Identify Duplication and Use of Similar Information**

No other sources collect this specific data or similar information that could be used for this purpose.

### **5. Impact on Small Businesses or Other Small Entities**

Reporting is performed by Title VI grantees (tribes and other Native organizations). No small businesses or other small entities will be involved in this information collection.

### **6. Consequences of Collecting the Information Less Frequent Collection**

The Older Americans Act requires the Department to report annually on the performance of this program. If the reports were made less frequently, AoA would not fulfill its statutory reporting responsibilities.

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

- **Requiring respondents to report information to the agency more often than quarterly;**

Not applicable. Reports are only required on an annual basis.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Not applicable.

- **Requiring respondents to submit more than an original and two copies of any document;**

Not applicable.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

Not applicable.

- **In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**

Not applicable.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Not applicable.

- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

Not applicable.

- **Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

Not applicable.

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

A 60-day Federal Register Notice was published in the *Federal Register* on August 15, 2018, Vol. 83, No. 158, pp. 40519-40520 83 40519. This notice is included below:

ACL received comments from ten (10) organizations and two (2) individuals about the Program Performance Report (PPR) redesign. ACL reviewed all of the comments. However, some of the comments were deemed to not be relevant because they were: (a) about the data submission process itself; (b) did not request a change; (c) only related to format; or (d) indicated topics for technical assistance and training for the final data collection. For ease of review, the remaining comments and their responses have been grouped by topic or issue. The ACL responses for each topic/issue are detailed below:

<b>Topic/Issue</b>	<b>Comment</b>	<b>ACL Response</b>
Additional comment boxes for story telling	One of the comments was to include a comment box to the PPR to allow for programs to better share their stories	ACL has added a comment box at the end of the PPR for program staff to share contextual information about how their program is addressing the needs of Elders in their community.
Additional data reporting	There were some concerns expressed around having to keep track of and report additional data.	Although ACL understands that reporting can be a burdensome process, having better and richer data is a priority for the Title VI program, particularly where it allows us to align with the data collection

		for Title III.
“Tribal Organization”	There was a suggestion posited by two organizations to change the term “Tribal Organization” to something more encompassing.	ACL has decided to use the term “Grantee Name” to be more inclusive of tribal consortia, Native Hawaiian organizations, and other entities that did not feel covered under the previous term of “Tribal Organization”.
Staffing/ Volunteers	Five organizations commented that they found the prospect of collecting data on volunteers and their hours to be an unnecessary reporting burden.	Upon consideration of the issues brought up through the FRN comments, ACL has decided to remove the question on volunteers and volunteer hours.
Nutrition Questions	There was one comment noting that there were too many questions around nutrition education and counseling.	ACL understands that reporting can be a burdensome process and so have updated the questions under “Other Nutrition Services” to only ask one additional question regarding number of persons receiving nutrition counseling. In keeping with Title III’s SPR we have updated Nutrition Education hours to “sessions”.
Meal Mileage	There were many comments (both positive and asking for clarification) related to a proposed question around home-delivered meal mileage.	ACL has decided to remove this question from the PPR and will consider posing it to grantees through a different data collection source at a later date.
Ombudsman	Removal of the ombudsman question.	ACL will not add an ombudsman question back into the Title VI PPR as official ombudsman services should be reported through the State Ombudsman and collected in the NORS tool. However, ACL has decided to add in a question related to visiting nursing homes and other assisted living facilities as we agree that these activities are important to capture.
Other Supportive Services	Suggestions to add space for grantees to report on the types of supportive services they provide.	ACL has decided to add an optional text box for programs to share other supportive services they may offer that are not currently listed.
Transportation	Suggestions to split transportation into assisted and unassisted as they are in Title III’s SPR.	ACL appreciates the suggestion to collect more data but has decided in the interest of balancing data collection and burden to not make the distinction between the different “types” of transportation provided by a program.
Social Events	Question about the purpose of “social events held” and whether it would be better to	Title III does not ask for this information. A social event, as it is being defined in Title VI, can be recorded as “Other” in

	change to social/recreation events held” to allow cost sharing with Title III.	SPR.
Finance Section for Part A/B	The comments on the newly added finance section for Part A/B were varied and ran from asking that the question be removed and others asking for more options to share data.	ACL is sensitive to the burden that may be caused by asking for new kinds of information from our grantees, we find that requiring this information will allow us to better advocate for our programs and their financial needs. Based on the comments ACL has added an optional text box for grantees to explain more about their financial situations, and has also added additional options under the section asking for types of funding used.
Caregiver (language)	Suggestions to change some of the language in the caregiver section to make it clearer.	ACL has updated the language in this section to be less wordy and using the term “caregiver” rather than “persons” to make it clearer that the intended recipients of services are caregivers and not those they care for.
Caregiver (Information and Assistance)	There were a couple of suggestions that Information and Assistance should be separated from one another.	ACL has chosen to maintain consistency in this area with Title III’s SPR and will ensure that training and technical materials make it clear how we are defining Information and Assistance and how to best collect it.
Finance Section for Part C	Suggestion to not add the finance section and asking for the cost of respite care to be pulled out.	ACL is sensitive to the burden that may be caused by asking for new kinds of information from our grantees, we find that requiring this information will allow us to better advocate for our programs and their financial needs. ACL chose respite care from the five required services based on the thinking that the cost of this service would be easier to track.

**9. Explanation of any Payment/Gift to Respondents**

Not applicable.

**10. Assurance of Confidentiality Provided to Respondents**

ACL has conducted a Privacy Impact Assessment (PIA) which shows that individuals are not identified in the PPR (Program Performance Report) data collection. Individual level/person level data is not collected; therefore PII (Personally Identifiable Information) is not applicable. PPR reporting contains only aggregate level data; therefore there are no assurances of confidentiality.

## **11. Justification for Sensitive Questions**

No information of a sensitive nature is being asked or collected.

## **12. Estimates of Annualized Burden Hours (Total Hours & Wages)**

The information below shows the estimated annualized burden hours and costs for grantees to enter their data.

Title VI funding is broken into three categories. Parts A and B are for nutritional and supportive programming, and ask for the same information. Part A is for American Indian and Alaska Native grantees, and Part B is for Native Hawaiian grantees. Part C is for caregiver programming. All Part C grantees must have Part A/B funding; but not all Part A/B grantees will have Part C programs. Therefore, there are 270 unique respondents, but only 237 will have to complete all portions of the PPR. The burden hours are based on the number of grantees (270 grantees for the current funding cycle with Part A/B and 237 grantees with Part C), at an estimated average time of 1.83 hours for A/B and 1.66 hours for C per year submitted annually for a total of 887.5 hours.

<b>Respondent/Data Collection Activity</b>	<b>Number of Respondents</b>	<b>Responses Per Respondent</b>	<b>Hours Per Response</b>	<b>Annual Burden Hours</b>
PPR Part A/B	270	1	1.83	494.1
PPR Part C	237	1	1.66	393.4
<b>Total:</b>	507			887.5

### **Costs to Respondents**

<b>Type of Respondent</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Total Respondent Costs</b>
American Indian, Alaskan Native, Native Hawaiian program staff	887.5	\$61.64 per hour <sup>1</sup>	\$54,705.5

<sup>1</sup> The Hourly Wage Rate of \$30.82 per hour is derived from the Bureau of Labor Statistics 2017 Occupational Employment and Wages Estimates median hourly wage for Social and Community Service Managers. Hourly wage of \$30.82, plus a factor of 100% (\$30.82) to account for benefits and overhead. Link: <https://www.bls.gov/oes/current/oes119151.htm>

**13. Estimates of other Total Annual Cost Burden to Respondents or Record-keepers/  
Capital Costs**

There are no additional costs to the projects beyond those already identified in Item 12 above.

**14. Annualized Cost to Federal Government**

The total Federal burden hours for two staff spent reviewing and analyzing the program data are estimated to be 200 hours annually at an average salary rate of a GS-13 \$46.46 per hour<sup>2</sup> for a total of \$9,292.

At an average salary rate of a GS-12 \$39.07 per hour for a total of \$7,814. Factoring in 100% to account for benefits and overhead and the ACL database contract of \$773,000; the total estimated annualized cost to the Federal Government is \$ 807,212.

Staff Hours/Costs

Grade 13: 200 hrs. X \$92.92 per hour	\$ 18,584
Grade 12: 200 hrs. X \$78.14 per hour	\$ <u>15,628</u>
	\$ 34,212
Contract for database	\$ 773,000
Total Cost to Federal Government	\$ 807,212

**15. Explanation for Program Changes or Adjustments**

These reporting requirements are a revision of those which are currently in effect under OMB 0985-0007. There is a program change increase from 2.5 hours for A/B and C to 3.5 hours per respondent, for a total increase of 392.5 annual burden hours.

The factors that influenced the revision of the PPR include:

1) the need to modernize the data structure to allow for more efficient reporting and the ability to use current technology for reporting and analysis; 2) the interest in aligning data elements within and across data collections; 3) the need to consider alternative data elements that reflect the current Aging Network and long-term care services and supports; and 4) the need to enhance data quality.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Results from Program Performance Report are uploaded to the Aging Integrated Database (AGID) available on-line at <http://www.agid.acl.gov/> . Results are available annually.

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

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<sup>2</sup> Federal staff costs based on 2018 hourly wage rate of \$46.46 for a Project Officer at the GS 13 level and \$39.07 for a Project Officer at the GS 12 level. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf). Accessed November 29, 2018.

We are not seeking approval to not display the expiration date for OMB approval of the information collected.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to this request for certification.

**Supporting Statement Part B.**

**Collection of Information Employing Statistical Methods.**

This information collection does not employ statistical methods.