

Supporting Statement for the Annual Semi-Annual and Final Reporting Requirements for Administration for Community Living Discretionary Grant Programs for FY 2018-2020

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Community Living (ACL) requires grantees funded under its discretionary grants programs to report semi-annually on the performance of their projects. This request is for a renewal of the OMB approval of the existing ACL performance reporting requirements and proposes no changes to the currently approved 0985-0006. ACL requires grantees funded under its discretionary grants programs to report on the performance of their projects. This request is for an extension without change of the generic clearance mechanism currently in use to meet AoA's performance reporting requirements.

Under the PRA, a "Generic Clearance" is approved by OMB for conducting more than one information collection (IC) using very similar methods and set protocols of questions that are approved for multiple ICs. AoA uses the generic clearance mechanism to collect performance data for a number of its smaller programs. The information submitted by ACL discretionary grantees is used by AoA to: (a) review and monitor the grantee's progress in achieving project objectives; (b) identify significant findings, products, and practices of the project; and (c) identify areas of performance that may benefit from advice and assistance from ACL and, in rare instances, take corrective action.

The current AoA Grantee Performance Report Instrument and Instructions will expire on April 30, 2019. Under this request, ACL would request that OMB approve an extension without change of this information collection mechanism for 18 months after expiration. During this extension period, ACL plans to substantively revise and submit a Generic Clearance request covering discretionary grant ICs across ACL, not just under the Older Americans Act.

2. Purpose and Use of the Information Collection

The information submitted by ACL discretionary grantees is used by ACL to: (a) review and monitor the grantee's progress in achieving project objectives; (b) identify significant findings, products, and practices of the project; and (c) identify areas of performance that may benefit from advice and assistance from ACL and, in rare instances, take corrective action.

3. Use of Improved Information Technology and Burden Reduction

The information must be submitted in electronic form.

4. Efforts to Identify Duplication and Use of Similar Information

No other data source collects this or similar information

5. Impact on Small Businesses or Other Small Entities

The ACL grant programs that use this standard reporting format are state governmental entities, universities, and non-profit organizations. The types of grantees are based on statutory requirements. As such, small businesses are not affected.

6. Consequences of Collecting the Information Less Frequently

If the reports were to be made less frequently than semi-annually, the grantee would be less accountable to ACL for its actions, have less opportunity to receive constructive advice from ACL, and likely would miss opportunities for mid-course corrections. This report is submitted semi-annually, not just annually, for several reasons. First, some of the programs authorized by the Older Americans Act, which are the predominant programs that use this format, are statutorily required to report semi-annually. In addition, some ACL Project Officers require that program progress be reported on a semi-annual basis due to the nature of the programs, particularly if they are implementing new service delivery practices in the community. Semi-annual reporting provides a useful tool to address obstacles or other issues in a formal manner as quickly as possible.

Also, due to limited funds that preclude ACL Project Officers from conducting site visits, semi-annual reporting from grantees allow Project Officers to monitor their grant programs in a more proactive manner.

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

There are no special circumstances related to this information collection.

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

ACL published a 60-day Federal Register Notice in 84 FR 9528 on 3/15/2019 and did not receive any public comments. A 30-day Federal Register Notice pends publication at submittal of this extension request to OMB.

9. Explanation of Any Payment or Gift to Respondents

Not applicable

10. Assurance of Confidentiality Provided to Respondents

Information provided in the Performance (Progress) Report is not confidential; the report is an accounting of project activities supported by public funds. There are no assurances of confidentiality.

11. Justification for Sensitive Questions

This request does not involve questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs:

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
ACL Grantee	N/A	266	2	20	
Total		532			10,640

The number of respondents reflects the number of grant awards we expect to be issued and monitored using this program progress report format based on FY 2016 forecast data for new grants and our official electronic grant system, Grant Solutions, for non-competing continuations.

The burden estimate is specific to the type of work done by the grantees that use this reporting format. The 20 hour estimate is based on an informal survey of 9 respondents and the last FY grant collection reporting cycle.

Estimated Annualized Cost to Respondents Based on Burden Hours:

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
ACL Grantee	10,640	\$55.76	\$593,286

The hourly wage rate was calculated using the average salary of individuals with a bachelors in social work (BSW) in the United States. The majority of grantees who submit this information are individuals with BSW degrees.

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

There are no other total annual cost burden to respondents and record keepers.

14. Annualized Cost to the Federal Government

The estimated annualized cost to federal government is \$193,308.

The total Federal burden hours for two staff spent reviewing and analyzing the program data are estimated to be 2,400 hours annually.

For a Program Officer at a GS-13 step one taking 1,800 annual burden hours to review and follow-up with grantees at an average salary rate of \$43.52 per hour¹ the annual cost totals \$156,672.

For a Grants Officer at a GS-11 step one taking 600 annual burden hours to review and follow-up with grantees at an average salary rate of \$30.53 per hour² the annual cost totals \$36,636.

At a salary rate of a GS-13 \$87.04 per hour factoring in 100% to account for benefits and overhead; and a salary rate of a GS-11 \$61.06 per hour factoring in 100% to account for benefits and overhead the total estimated annualized cost to the Federal Government is \$193,308.

Staff Hours/Costs

Grade 13: 1800 hrs. X \$87.04 per hour	\$	156,672
Grade 11: 600 hrs. X \$61.06 per hour	\$	<u>36,636</u>
	\$	193,308

15. Explanation for Program Changes or Adjustments

There are no program changes or adjustments, this is a request for approval to extend the currently approved information collection with no changes.

16. Plans for Tabulation and Publication and Project Time Schedule

Project Officer's use collected information to ensure that grantees are adhering to their project proposal and making expected progress with their project. In the event of project delays, etc, the Project Officer uses the report to learn more about where/how they might be able to support (provide technical assistance to) the grantee. ACL does not create a report with the information. This information collected is strictly used as a project monitoring tool.

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

There is no reason display of OMB expiration date would be inappropriate

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to certification for paperwork reduction act submissions

¹ Federal staff costs based on 2018 hourly wage rate of \$43.52 for a Project Officer at the GS 13 level https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf

² Federal staff costs based on 2018 hourly wage rate of \$30.53 for a Grants Officer at the GS 11 level https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf