

# **Project Outcomes Assessment Survey**

OMB Information Collection Request - Revision

0970 - 0379

Supporting Statement Part A - Justification

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Submitted By:

Administration for Native Americans  
Administration for Children and Families  
U.S. Department of Health and Human Services  
Amy Zukowski  
Administration for Native Americans  
Director, Division of Program Evaluation and Planning  
202-205-5606  
[Amy.zukowski@acf.hhs.gov](mailto:Amy.zukowski@acf.hhs.gov)

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## 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 Children and Families (ACF) 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 2992 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.

This request is for a revision to the approved collection under OMB #0970-0379. Revisions are required as ANA removed several questions it deems superfluous and not reviewed by analysts. This allows for more in-depth qualitative questions to be added, as well as the clarification of some remaining questions which were ambiguous. (See Attachment D.)

The Native American Programs Act of 1974 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 assesses at least 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 collected once at the end of the grant project period and used by ANA to report quantifiable results to Congress on the outcomes 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 percent. The POAS has been developed in an MS Access database, which will allow ANA to easily extract data and perform subsequent analysis. The questions will be provided to the grantee in advance of the meeting so they are better prepared.

**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**

Small businesses will not be adversely impacted.

**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 60-day Federal Register Notice was published on February 21, 2019, vol. 84, p.5447 and no comments were received. No agencies outside of Administration for Children and Families/ANA were consulted on these revisions; however the Office of Planning, Research, and Evaluation was consulted on the framing of questions.

**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 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 POAS.

**12. Estimates of Annualized Burden Hours and Costs**

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

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Project Outcome Assesment Survey (POAS)	85	1	6	510

**Estimated Total Annual Burden Hours: 510**

The dollar equivalent would be \$17.50 X 510 hours or \$8,925.

The job code is 21-1093 and wage data from May 2017 is \$17.50 per hours.

The estimate of annualized cost to respondents for hour burden (inclusive of fringe and overhead) is \$34.10. The dollar equivalent would be \$34.10 X 510 hours or \$17,391.

<https://www.bls.gov/oes/current/oes211093.htm>

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

No annual cost burden to the federal government.

**14. Annualized Cost to the Federal Government**

The annual cost burden to the federal government is approximately \$13,400 to collect and analyze data.

**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 no longer analyzed by ANA. Also, questions were rephrased for clarification purposes with few additional requests to the primary content. As previously approved questions have been eliminated, renumbered or replaced, there should be no considerable increase or decrease in burden to the grantee. See Attachment D for detailed changes. On-site interviews should still only last no longer than six (6) hours.

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

All ANA grants have a standardized completion date of June 30 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)**

N/A

**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
  
2. Procedures for the Collection of Information
  
3. Methods to Maximize Response Rates and Deal with Nonresponse
  
4. Test of Procedures or Methods to be Undertaken
  
5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data