

Supporting Statement for the State Program Report for FY 2019-2022

A. Justification

1. Circumstances Making the Collection of Information Necessary

- This is a request for Office of Management and Budget (OMB) approval of Administration for Community Living's (ACL) Administration on Aging (AoA) Title III and Title VII performance data. ACL is seeking OMB approval to continue collecting data using the State Program Report after expiration on 12/31/2019. This is a revision request to the 2016 approved version of the Reporting Requirements for Title III and VII State Program Report Definitions. The currently approved version of the State Program Report (SPR) includes language intended for usage in FY 2023. Since these data elements are not required for usage until FY 2023, under the Paperwork Reduction Act ACL is required to update the information collection (IC) to contain only the language and requirements for collection years 2020-2023. Removing the proposed FY 2023 language from the currently approved SPR causes a revision to OMB 0985-0008. ACL intends to seek OMB approval under a new OMB control number for the FY 2023-2026 data elements allowing usage of 0985-0008 until the new IC is approved and ready for usage.
- The Older Americans Act (OAA), P.L. 89-73, enacted July 14, 1965, last amended in April 2016, P.L. 114-144, requires a report annually on the performance of Older Americans Act funded projects. (42 U.S.C. 3012).
- Data collection is essential to provide performance measures as required by Congress and the GPRM Modernization Act of 2010 (GPRAMA).

2. Purpose and Use of Information Collection

- The information submitted by Title III grantees is AoA's principle source for data and information on programs and services funded under the Older Americans Act (OAA). The State Program Report (SPR) serves as the Program Performance Report for the state 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 provided or managed by State Units on Aging (SUA) and Area Agencies on Aging (AAA). Data is submitted annually by the 50 states, four Territories (American Samoa, Guam, Puerto Rico, and Virgin Islands), and Washington, D.C. It includes information on the number of people served, the number of units of specific services, Title III expenditures, total expenditures, number of state and local staff, number of providers, and major accomplishments.

Data from the SPR are a significant 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, the press as well as program and policy decision makers. The performance measures from the SPR are: Outcomes: 1.1, 2.10, 3.1, 3.3, 3.5, 3.6; Outputs: C, D, E, F, G, H, AB, L, M, N, O, I, J, K (<https://acl.gov/about-acl/budget>).

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

3. Use of Improved Information Technology and Burden Reduction

- States are required to submit data electronically via a secure on-line data collection portal.

4. Efforts to Identify Duplication and Use of Similar Information

- No other sources collect this or similar information.

5. Impact on Small Businesses or Other Small Entities

- Reporting is performed by State Units on Aging. No small businesses will be involved in this collection.

6. Consequences of Collecting the Information Less Frequent Collection

- The Older Americans Act contains provisions for annual reporting. If the reports were made less frequently, AoA would not fulfill its legislated reporting responsibilities.

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

- None of the listed circumstances applies to this submission.

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 30, 2019, Vol. 84, No. 169, pp. 45768-45769. There were no public comments received during the 60-day FRN comment period.
- The 30-day Federal Register notice was published in the *Federal Register* on November 12, 2019, Vol. 84 No. 169 page 61062.

9. Explanation of any Payment/Gift to Respondents

- Not applicable.

10. Assurance of Confidentiality Provided to Respondents

- Individuals are not identified in the report. Aggregate data are being collected.

- ACL has conducted a Privacy Impact Assessment (PIA) which shows that individuals are not identified in SPR (State Program Report) data collection. Individual level/person level data is not collected, therefore PII (Personally Identifiable Information) is not applicable. SPR reporting contains only aggregate level data collection.

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 states to enter their data.

12A. Estimated Annualized Burden Hours

The burden hours are based on the number of grantees (50 States, plus Territories (American Samoa, Guam, Puerto Rico, and Virgin Islands), and Washington, D.C.), at an estimated average time of 50 hours per year for 2,750 hours.

12A. Estimated Annualized Burden Hours

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
States	State Program Report	55	1	50	2,750

12B. Costs to Respondents

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
State Units on Aging staff	2,750	\$77.66 per hour ¹	\$213,565

¹ The mean hourly wage rate of \$38.83 per hour plus 100% overhead and benefits. Bureau of Labor Statistics May 2018 National Industry-Specific Occupational Employment and Wage Estimates, Business and Financial Operations Occupations, occupation code 13-000. Link: https://www.bls.gov/oes/current/naics4_551100.htm#13-0000

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

- There should not be any additional costs to the projects beyond those already identified in Item 12 above.

14. Annualized Cost to Federal Government

- The estimated annualized cost to the Federal Government is \$734,992.
- Base hourly rate for GS-Grades 12 & 13:

<u>Staff Hours/Costs</u>	
GS-13 200 hrs. X 95.04 per hour ²	\$ 19,008
GS-12 200 hrs. X \$79.92 per hour ³	\$ <u>15,984</u>
	\$ 34,992
 Contract for database	 \$ <u>700,000</u>
Total Cost to Federal Government	\$734,992

15. Explanation for Program Changes or Adjustments

- There is a program change increase of 874 annual burden hours and an adjustment decrease of -1 respondent.

16. Plans for Tabulation and Publication and Project Time Schedule

- Results from State Program Report are uploaded to the Aging Integrated Database (AGID) available on-line at <https://agid.acl.gov/>. Results are available annually and all data are available on this site.

The annual goal of posting is December of each year. Data on the supportive services programs and congregate and home delivered nutrition programs under Title III of the Older Americans Act are available on-line, which include the following features:

- Data-at-a-Glance, a tool for generating quick estimates of data in table form, supplemented by map and chart graphical presentations;
- State Profiles, featuring profiles of state Older Americans Act programs;
- National Tables, tables listing state-specific data; and
- Custom Tables, a query database which allows users to produce detailed, multi-year tables.

² Hourly wage rate GS-13 \$47.52 plus 100% overhead and benefits from the 2019 OPM Salary and Wages https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx

³ Hourly wage rate GS-12 \$39.96 plus 100% overhead and benefits from the 2019 OPM Salary and Wages https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx

- o Issue Briefs are also available on the ACL website <https://acl.gov/aging-and-disability-in-america/data-and-research> and on AGID at <https://agid.acl.gov/Resources/>.

17. OMB Expiration Date

- We will display the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

- There are no exceptions to this request for certification.

B. Collection of Information Employing Statistical Methods.

- Not applicable.