

# **Administration for Native Americans (ANA) On-Going Progress Report (OPR) and Objective Work Plan (OWP)**

**OMB Information Collection Request  
0970 - 0452**

## **Supporting Statement Part A - Justification**

**August 2020**

Submitted By:  
Administration for Native Americans  
Administration for Children and Families  
U.S. Department of Health and Human Services

## **SUPPORTING STATEMENT A – JUSTIFICATION**

### **Summary**

This request is for a revision to the approved information collection, On-going Progress Report (OPR) and Objective Work Plan (OWP) (OMB # 0970-0452). The request includes the continued use of the currently approved OPR, with minimal changes to the instructions, through fiscal year (FY) 2020 and a revised version of the OPR to be used beginning FY 2021. The revised OPR combines the Administration for Children and Families Administration for Native Americans' Annual Data Report (currently approved under OMB #0970-0475) with the OPR. There are no changes proposed to the OWP.

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

The Objective Work Plan (OWP) information collection is conducted in accordance with 42 USC of the Native American Programs Act of 1972, as amended. This collection is necessary to evaluate applications for financial assistance and determine the relative merits of the projects for which such assistance is requested, as set forth in Sec. 806 [42 USC 2991d-1](a) (1).

The Ongoing Progress Report (OPR) information collection is conducted in accordance with Sec. 811 [42 USC 2992] of the Native American Programs Act and will allow the Administration for Children and Families (ACF) Administration for Native American (ANA) to report quantifiable results across all program areas. It also provides grantees with parameters for reporting their progress and helps ANA better monitor and determine the effectiveness of their projects.

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

The OPR is submitted to ANA on a semi-annual basis and provides grantees with a set format by which they report on their performance indicators, progress achieved, and training and technical assistance needs. This standardized format allows ANA to monitor grantee progress, identify grantees that may need training and/or technical assistance, and report quantifiable results to Congress.

ANA seeks approval for two versions of the OPR. OPR FY 2020 will be used from for the remainder of FY 2020 and OPR FY 2021 will be used beginning with FY 2021 reporting. The OPR FY2021 has been revised to include ANA's Annual Data Report (ADR) (currently approved under OMB #0970-0475). The ADR mainly collects quantitative data from grantees, whereas the OPR collects more qualitative data from grantees.

The information collected in the OWP is used by ANA to determine if an applicant has a viable implementation plan from which to carry out a proposed project. Applicants are required to complete this as part of their funding application package. The OWP is a planning

and implementation tool which requires applicants to map out their goals, objectives, activities, resources, and time frames for their projects. It is used on the front end during the panel review process, and by ANA program specialists throughout the grant period to compare projected objectives and activities against actual accomplishments in order to gauge grantees' progress. There are no changes proposed to the OWP.

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

Applicants are able to electronically submit the OWP through [www.grants.gov](http://www.grants.gov). The OPR is an online form which grantees can complete electronically and submit in the GrantSolutions system, a Grants Management Center of Excellence managed by ACF.

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

ANA has reviewed information collection instruments and has determined that there are no existing forms that can be used to meet ANA's data collection needs.

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

The information being requested has been held to the absolute minimum required for the intended use.

### **6. Consequences of Collecting the Information Less Frequently**

Failure to collect this information would violate the legislative mandate of the Native American Programs Act of 1974 as amended. The OWP is required one-time only (at time of application), and the OPR is only required to be collected on a semi-annual basis in order to effectively monitor ANA projects. Completing the OPR is a reporting requirement as a term and condition of an ANA grant award.

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

There are no special circumstances.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to

request an OMB review of this information collection activity. This notice was published on June 12, 2020, Volume 85, Number 114, page 35935, and provided a sixty-day period for public comment. We did not receive any comments during the notice and comment period.

### 9. Explanation of Any Payment or Gift to Respondents

No payments or gifts have been or will be provided to any respondents.

### 10. Assurance of Confidentiality Provided to Respondents

Information being requested in the OWP and OPR is not considered confidential. Therefore, no additional safeguards are considered necessary beyond those that are customarily applied to routine government information. In rare cases, grantees may insert or attach information to their OPRs, such as community meeting attendance lists that include contact information. ANA will take reasonable precautions to keep information contained in the OPR private to the extent permitted by law. The OWP and OPR are "housed" electronically on the ACF GrantSolutions system.

### 11. Justification for Sensitive Questions

This is not applicable. No information of a sensitive nature is requested in the OWP or OPR.

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

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
OWP 2020-2021	300	1	3	900	300	35.62	\$10,686.00
OPR FY 2020	200	2	1	400	133	35.62	\$4,689.58
OPR FY 2021-Exp Date	200	4	2	1600	533	35.62	\$18,985.46
<b>Estimated Annual Burden Total:</b>					<b>966</b>	<b>Estimate d Annual Cost Total:</b>	<b>\$34,361.04</b>

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2019 which is \$17.81 per hour. To account for fringe benefits and overhead the rate was multiplied by two

which is \$35.62. The estimate of annualized cost to respondents for hour burden is \$35.62 times 966 hours or \$34,361.04.

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

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

There are no additional costs to respondents or record keepers.

### **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**

This request includes revisions to the previously approved information collections, as described below.

#### **Ongoing Progress Report FY 2020**

- The estimated number of respondents to the OPR has decreased from the prior approval to better align with ANA's actual portfolio.
- Minor clarifying adjustments to the instructions.

#### **Objective Work Plan**

- The estimated number of respondents has decreased from the prior approval to better align with the number of applications that ANA has received on an annual basis in previous years.
- No changes to content.

#### **On-Going Progress Report Beginning FY 2021**

- The estimated number of respondents to the OPR has decreased from the prior approval to better align with ANA's actual portfolio.
- The estimated average time to complete the revised OPR has increased from 1 hour to 2 hours. This increase is due to the incorporation of data elements from ANA's Annual Data Report (OMB #0970-0475). ANA will discontinue the Annual Data Report information collection. The streamlining of the reporting periods will ultimately reduce the burden on the grantee. Reporting will be due at the same time semi-annually.
- Revisions proposed to the OPR FY21 include:

- **Staffing (Question 5):** The staffing table is replaced by two staffing tables – one for project funded staff and the second for jobs obtained as a result of the project activities. This will allow ANA to collect more accurate real time data on jobs created as a result of the project as a whole.
- **Native Asset Building Initiative (NABI) Grants:** This section is removed as ANA has discontinued the NABI program area.
- **Impact Indicators:** Questions from ANA’s Annual Data Report are placed in the OPR. Due to the expansion of one of ANA’s programs to five years, ANA has included targets for Years 4 and 5; however this is to be filled out by ANA.
- **Native Youth and Elder Engagement:** Questions from ANA’s Annual Data Report are placed in the OPR.
- **Project Development:** Questions from ANA’s Annual Data Report are placed in the OPR.
- **Partnerships:** Questions from ANA’s Annual Data Report are placed in the OPR.
- **Community Involvement and Participation in the Project:** Questions from ANA’s Annual Data Report are placed in the OPR.
- **Use of Project Data:** This is removed from the information collection to reduce duplication, as ANA receives this information from another information collection.
- **Project Benefits:** Questions from ANA’s Annual Data Report are placed in the OPR.
- **Lessons Learned:** Questions from ANA’s Annual Data Report are placed in the OPR.
- **Language Projects Only:** Questions from ANA’s Annual Data Report are placed in the OPR. Only Native Language Preservation and Maintenance, Esther Martinez Immersion and Native Language Community Coordination Demonstration Project grants will report in this section.
- **Esther Martinez Immersion (EMI) Projects Only:** Questions from ANA’s Annual Data Report are placed in the OPR. Only Esther Martinez Immersion grants will report in this section.
- **Environmental Regulators Enhancement (ERE) Projects Only:** Questions from ANA’s Annual Data Report are placed in the OPR. Only Environmental Regulators Enhancement grants will report in this section.
- **End-of-Project Addendum –BENEFITS, RESULTS, AND OUTCOMES:** Questions from ANA’s Annual Data Report are placed in the OPR. These questions will only be asked of projects that do not receive an end of project onsite visit in accordance with Native American Programs Act of 1974, § 811. ANA has worked to visit as many ending projects as realistic given budgetary, time constraints or staffing, therefor the impact on the public for this section should be minimal.

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

The OWP form will be made available on Grants.gov and the ACF Grants webpage. OPRs will be tabulated and the aggregate data shared with Congress and other stakeholders 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.