

Evaluation of the Administration for  
Community Living's (ACL) American Indian,  
Alaskan Native, and Native Hawaiian  
Programs (OAA Title VI) – Revision  
Administration for Community  
Living/Administration on Aging  
Supporting Statement Part A

September 2020

## **A. Justification**

The Administration for Community Living (ACL) is requesting approval for data collection associated with the Evaluation of the Administration for Community Living's (ACL) American Indian, Alaska Natives, and Native Hawaiian Programs (Older Americans Act [OAA] Title VI; short title: *Evaluation of the Title VI Programs*). OAA Title VI establishes grants to Native Americans for nutrition services, supportive services, and family caregiver support services. The purpose of Title VI is "to promote the delivery of supportive services, including nutrition services, to American Indians, Alaskan Natives, and Native Hawaiians that are comparable to services provided under Title III" (42 U.S.C. 3057), which provides nutrition, caregiver and supportive services to the broader U.S. population. Title VI is comprised of three parts; Part A provides nutrition and supportive services to American Indians and Alaska Natives, Part B provides nutrition and supportive services to Native Hawaiians, and Part C provides caregiver services to any programs that have Part A/B. The previous data collection for this project entailed a series of interviews and focus groups with Title VI program staff, elders, and caregivers. This data collection revision is requesting to collect information via a new follow-up tribal program staff interview.

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

American Indian, Alaska Native, and Native Hawaiian (AI/AN/NH) populations experience significant health and socioeconomic disparities compared to the rest of the U.S. population. The AI/AN population has the highest rate of disabilities and the lowest life expectancy compared to the averages for the overall population (Centers for Disease Control and Prevention [CDC], 2008; Goins, Moss, Buchwald, & Guralnik, 2007). While 18% of the non-Hispanic white population is 65 years or older, just 8% of Native Hawaiians and 10% of the AI/AN population is 65 years or older (AoA, 2015). However, as overall life expectancy increases, the proportion of older AI/AN adults is expected to increase. By 2050, the percentage of non-Hispanic white adults is expected to decrease by 20%, while the population of older minority population adults, including AI/AN/NH, is expected to increase by 110% (AoA, 2015; CDC, 2013). For AI/AN populations, this translates to a 93% increase in the number of older adults. In addition, the population aged 75 and older needing long-term care is expected to double by the year 2030 (AoA, 2015; CDC 2013; Goins et al., 2007).

In fiscal year 2017, ACL awarded 270 Title VI three-year grants to tribes/tribal organizations and one organization serving Native Hawaiian elders for the provision of nutrition and supportive services, as well as 236 three-year grants for the Native American Caregiver Support Program. The Evaluation of the Title VI Programs will examine the effects of the program on:

1. Older Indians, their families and caregivers
2. Tribal communities
3. Intergenerational connections in tribal communities
4. Management of the Title VI program

**The Need for Evaluation**

The Evaluation of the Title VI Programs is authorized under Section 206(a, c) of Title II of the OAA, which directs ACL to “...measure and evaluate the impact of all programs authorized by this Act, their effectiveness in achieving stated goals in general, and in relation to their cost, their impact on related programs, their effectiveness in targeting for services under this Act unserved older individuals with greatest economic need (including low-income minority individuals and older individuals residing in rural areas) and unserved older individuals with greatest social need (including low-income minority individuals and older individuals residing in rural areas), and their structure and mechanisms for delivery of services, including, where appropriate, comparisons with appropriate control groups composed of persons who have not participated in such programs.”

Consistent with requirements of the Government Performance Results Modernization Act (GPRMA), ACL’s Administration on Aging (AoA) integrates its strategic priorities and plans with performance measurement criteria. The AoA has three major performance measures: improve program efficiency, improve client outcomes, and improve effective targeting of vulnerable elders. Through program evaluations, ACL seeks a better understanding of key programs, such as the programs under Title VI of the OAA for AI/AN/NH.

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

Having completed most of the data collection, the Evaluation of the Title VI Programs has an interest in adding a data collection activity to do a follow-up interview with evaluation grantees after they have completed the current evaluation cycle to understand which components of the technical assistance they have received have been the most useful for them.

Exhibit 1 provides an overview of the new Evaluation of the Title VI Program data collection activity.

**Exhibit 1. Data Collection Activities**

Activity	Purpose, Respondents, Method, and Relevant Study
Title VI Program Staff Follow-up Interviews	The Program Staff Follow-up Interviews will assess how the Title VI Programs have been utilizing and implementing the Technical Assistance they have received from the contractor around the practice of evaluation. Data will include how evaluation practice is being implemented and on what occurring basis, as well as perceptions of met and unmet needs around evaluation; and barriers to using evaluation. Up to 2 local staff (e.g., program director and evaluation staff person) will participate in each interview. The interviews will be conducted via telephone in Year 4 with up to 12 evaluation grantees, for a maximum of 24 participants, and will take 60 minutes to complete. <i>See Attachment A (Title VI Program Staff Consent Form and Interview Guide).</i>

**Use of Information Collected**

ACL’s strategic priorities are to empower older people and their families to (1) make informed decisions about, and easily access, health and long-term care options and (2) enable seniors to remain in their own homes through the provision of home and community-based services. Central to these priorities is the pursuit of consistent and effective approaches to support older adults in their own homes and communities, and to coordinate the provision of supportive services to seniors and their caregivers in an integrated system of long-term care.

Information gathered through the Evaluation of the Title VI Programs will inform ACL and its partners, other Federal agencies and administrators, current grantees, policymakers, and the field about ways to improve service delivery for elders and their caregivers and helping them to remain in their homes for as long as possible. For example, information gathered through the evaluation will be used to identify gaps and challenges in service delivery, as well as areas of further need.

This is the first comprehensive evaluation of the Title VI Program. Without this evaluation, Federal and local officials will not be able to determine whether the Title VI Programs are having the intended impact on AI/AN/NH elders and whether the grantees are meeting the individual goals of the programs. The new proposed data collection will further allow ACL to understand how successful the training and technical assistance provided to Title VI evaluation grantees was for their practice of data collection and use.

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

Where possible, the evaluation has used secondary data sources to answer evaluation questions and minimize burden on respondents. Every effort has been taken to limit burden on individual respondents who participate in data collection activities. Staff follow-up interviews will be conducted via telephone to allow respondents flexibility in location.

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

Where possible, ACL has sought to avoid duplication of the design and data collection efforts by trying to identify existing instruments and data sets relevant to the study. However, there is no other way to collect information on the effectiveness of the training and technical assistance provided to Title VI grantees regarding data collection and usage.

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

No small businesses will be involved in this effort.

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

The Tribal Program Staff Follow-up Interviews will gather detailed information about how programs are continuing to strengthen their data and evaluation capacity. Conducting interviews minimizes burden as interviews will take 60 minutes.

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

This data collection request is fully consistent with the guidelines in 5 CFR 1320.8(d). There are no special circumstances required for the collection of information in this data collection.

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

A 60-day Federal Register Notice was published in the *Federal Register* on May 19, 2020, vol. 85, No. 397; pp. 22948-29949. No public comments to the evaluation materials were received during the 60-day public comment period. A 30-day Federal Register Notice published in the *Federal Register* on August 18, 2020, vol. 85, No. 160; pp. 50826-50827.

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

Respondents to the tribal program staff follow-up interviews will be grantee staff. Therefore, no remuneration is planned for those activities.

## 10. Assurance of Confidentiality Provided to Participants

There are no assurances of confidentiality, we will be taking notes during the interview, contact information and answers will be kept secure to the extent permitted by law.

To ensure the privacy of data compiled for the protection of human subjects, the data collection protocol and instruments for the Evaluation of the Title VI Program will be reviewed through the contractor's institutional review board (IRB) prior to the collection of covered or protected data. The contractor's IRB holds a Federal wide Assurance (FWA00002349; Expiration, July 12, 2023 – Attachment C) from the HHS Office for Human Research Protections (OHRP). This review ensures compliance with the spirit and letter of HHS regulations governing such projects. All protected data will be stored on the contractor's secure servers in the manner described in the IT Plan and IT Data Security Plan that was submitted to ACL on April 6, 2017.

In order to facilitate the administration of interviews, the contractor will collect names, addresses and e-mail contact information. This information will not be stored with or linked to responses, as all data will be reported in aggregate. All hard copy forms with this information will be stored in locked cabinets; contact information will be entered into a password-protected database accessible to a limited number of individuals who require access (e.g., selected contractor staff, such as data analysts). Once final data collection is complete, participant contact information will be deleted from the database and the hard copy forms will be destroyed.

## 11. Justification for Sensitive Questions

There are no expectation that any questions of a sensitive nature will be asked.

## 12. Estimates of Annualized Burden Hours and Costs

Clearance is being requested an additional point of data collection for the Evaluation of the Title VI Programs for 12 grantees. Exhibit 2 describes the estimated hourly burden associated with data collection activities while Exhibit 3 describes the estimated annualized costs associated with data collection activities. The cost was calculated based on the hourly wage rates for appropriate wage rate categories using data collected as part of the National Compensation Survey (BLS, 2015) and from the U.S. Department of Labor Federal Minimum Wage Standards.

The data collection timeframes are long; this is due to the cultural importance of establishing relationships in the communities where we will be gathering information and thus necessitates a different pace for data collection (LaVeaux and Christopher, 2009).

### Exhibit 2. Annualized Burden Hours

Respondent Type	Form Name	No. of Annual Respondents	No. of Responses per Respondent	Average Burden (in hours) per Response	Annual Burden Hours <sup>1</sup>
Program director	Program staff follow-up interview guide	12	1	1	12

<sup>1</sup> Rounded to the nearest whole number

Respondent Type	Form Name	No. of Annual Respondents	No. of Responses per Respondent	Average Burden (in hours) per Response	Annual Burden Hours <sup>1</sup>
<b>Total</b>		12			12

**Exhibit 3. Estimated Annualized Cost to Respondents**

Respondent Type	Form Name	No. of Annual Respondents	No. of Responses per Respondent	Average Burden (in hours) per Response	Hourly Wage Rate	Annual Respondent Cost
Program director	Program staff follow-up interview guide	12	1	1	\$33.38 <sup>2</sup>	\$400.56
<b>Total</b>		12				\$400.56

The estimated aggregated costs to respondents over the three-year period is \$400.56.

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

There will be no direct costs to the respondents other than their time to participate in each information collection.

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

Governmental costs for this project include personnel costs for federal staff involved in the plan and data collection design, data collection and analysis, and reporting. There are no equipment or overhead costs. The project covers an additional 6 months, the annual cost to the government is \$27,672, and the total cost to the government is \$61,278. The cost breakdown is described below.

This information collection includes approximately 30 percent level of effort of a GS-14 behavioral scientist’s time assuming a \$112,021 annual salary. The estimated annualized cost to the Federal Government for oversight by this individual is \$33,606.

The contractor is being compensated for the development of the instruments, as well as to collect and analyze participant data. The contract amount for the data collection is \$27,672.

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

There is a program change decrease of -875 annual burden hours with a program change decrease of -495 annual number of responses.

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

***Plans for Tabulation***

<sup>2</sup> Mean hourly wage for social and community service managers; [https://www.bls.gov/oes/2015/may/oes\\_nat.htm#31-0000](https://www.bls.gov/oes/2015/may/oes_nat.htm#31-0000)

Data collected through the evaluation will be analyzed to address key evaluation questions. The data collection will be qualitative so analysis for the interview data will involve the development of qualitative codebooks and include inductively-oriented and exploratory-analytic techniques aimed at identifying relevant stories emerging from the data.

The analyses also will involve systematically integrating the quantitative findings with themes that emerge from previous data collection for this evaluation.

**Publication**

The contractor has produced one interim report per year and will include the findings from the program staff followUp interviews in the final project report. The final report will include a comprehensive analysis and synthesis of findings related to all evaluation questions, describe the methods used to obtain data, data completeness and any data deficiencies, lessons learned, and relevant recommendations.

**Project Timeline**

Exhibit 4 provides the reporting schedule for the Title VI Programs evaluation.

**Exhibit 4. Timeline**

Activity	Timeline
OMB approval	Estimated August 2020
Data collection	Begins 1 month after OMB approval
▪ <i>Conduct Tribal Program Staff Follow-up Interview</i>	▪ <i>Estimated March 2021</i>
Final project report	September 2021

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

All data collection instruments will display the expiration date of OMB approval.

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

This collection of information involves no exceptions to the Certification for Paperwork Reduction Act Submissions.

## References

Administration on Aging. (2015). A profile of older Americans: 2015. Retrieved from [http://www.aoa.acl.gov/Aging\\_Statistics/Profile/2015/docs/2015-Profile.pdf](http://www.aoa.acl.gov/Aging_Statistics/Profile/2015/docs/2015-Profile.pdf)

Baum, F., MacDougall, C., & Smith, D. (2006). Participatory action research. *Journal Of Epidemiology And Community Health*, 60(10), 854-857.

U.S. Bureau of Labor Statistics. (2015). National Compensation Survey. Office of Compensation and Working Conditions. Washington, D.C. Retrieved from <https://www.bls.gov/ncs/>

Centers for Disease Control and Prevention. (2013). The state of aging and health in America 2013. Atlanta, GA: Centers for Disease Control and Prevention. Retrieved from [http://www.cdc.gov/features/agingandhealth/state\\_of\\_aging\\_and\\_health\\_in\\_america\\_2013.pdf](http://www.cdc.gov/features/agingandhealth/state_of_aging_and_health_in_america_2013.pdf)

Centers for Disease Control and Prevention. (2008). Racial/ethnic disparities in self-rated health status among adults with and without disabilities—United States, 2004–2006. *Morbidity and Mortality Weekly Report*, 57, 1069–1073.

Goins, R. T., Moss, M., Buchwald, D., & Guralnik, J. M. (2007). Disability among older American Indians and Alaska Natives: An analysis of the 2000 Census public use microdata sample. *The Gerontologist*, 47, 690–696.