# ADMINISTRATION FOR NATIVE AMERICANS (ANA) ANNUAL DATA REPORT (ADR)

OMB Information Collection Request 0970 - 0475

# Supporting Statement Part A -Justification

February 2022

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

## 1. Circumstances Making the Collection of Information Necessary

The Annual Data Report (ADR) information collection is conducted in accordance with Sec. 811 [42 USC 2992] of the Native American Programs Act and allows the Administration for Native Americans (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 ADR is submitted to ANA on an 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.

# 3. Use of Improved Information Technology and Burden Reduction

The ADR is now built into the On-Line Data Collection (OLDC) within GrantSolutions. This reduces the burden on the grantees and ANA program staff. Previously the information collection was a fillable Adobe form emailed to the grantee to be filled out and emailed back to the program office.

# 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.

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

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

The information being requested has been held to the absolute minimum required burden on small businesses. Most of ANA's grant recipients are smaller organizations and businesses.

#### 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 ADR is only required to be collected on an annual basis in order to effectively monitor ANA project progress. Reducing the frequency of the ADR would hamper ANA's efforts to exercise oversight responsibilities of its funded projects and would preclude ANA from offering timely training and technical assistance to grantees.

# 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 December 13, 2021, Volume 86, Number 236, page 70845, and provided a sixty-day period for public comment. During the notice and comment period. We did not receive comments.

# 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 ADR 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 ADRs, such as community meeting attendance lists that include contact information. ANA will take reasonable precautions to keep information contained in the ADR private to the extent permitted by law. The ADRs are "housed" electronically on the ACF GrantSolutions system, which requires a unique login and is only accessible by federal employees or their contractor designees, and the authorized officials as designated by the grant recipient.

# **11. Justification for Sensitive Questions**

This is not applicable. No information of a sensitive nature is requested in the ADR.

# 12. Estimates of Annualized Burden Hours and Costs

Burden estimates are based on previous experience collecting this information from grantees. There are 80 ANA funded grant recipients who are required complete the ADR. It takes each grantee about one hour each year to complete the ADR. This is a reduction from the previous number of respondents as ANA is phasing out this information collection and there are only 80 respondents remaining to complete the ADR.

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ADR	80	1	1	80	\$36.76	\$2,941

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 2020, which is \$18.38 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$36.76. <u>https://www.bls.gov/oes/current/oes211093.htm</u>

# 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

There are no changes to the information collection since the last OMB approval. There is a reduction of respondents to 80 ANA funded grant recipients who are required complete the ADR as ANA is phasing out this information collection and there are only 80 respondents remaining who are required to complete the ADR.

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

ADRs 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.