

# **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)

## **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. ANA proposes the following changes to the POAS:

- Removed several questions that were determined to be superfluous and not reviewed by analysts.
- Added more in-depth qualitative questions
- Clarified some questions that were noted as ambiguous.

Attachment A provides an overview of the changes.

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

The information collected in the POAS is collected once at the end of the grant project period. Collecting this project information fulfills requirements of ANA's congressionally mandated statute and is used by ANA to report quantifiable results to Congress on the outcomes of grantees' projects and effectiveness in achieving their planned project goals.

In addition to fulfilling requirements, the information collected in the POAS also serves as a valuable performance and planning tool for ANA. The analysis of information collected provides an opportunity to review and make changes to ANA's internal policies and procedures in an effort to better support and serve its grantees as well as informs Training and Technical Assistance providers on service delivery improvements and other grant recipients or potential recipients of activities ANA funds. Information collected on grantee best practices is and will continue to be made available to all ANA grantees and will serve as a resource guide for implementing effective and efficient projects. Other than providing information for the annual Report to Congress, the information collected is not published; it is used internally by ACF and shared directly with ANA grantees.

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

In order for ANA to obtain standardized and accurate data, the POAS is completed on-site with the grantee. The on-site process allows ANA to verify planned project deliverables and ensures a respondent rate of 100 percent. The POAS is housed in an MS Access database, which allows 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**

Many of the respondents are small businesses. The POAS is designed to impose the least burden possible while meeting ANA's reporting requirements and informational needs. On-site data collection is scheduled in coordination with the grantees and questions provided in advance to allow for preparation.

#### **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**

##### *Federal Register Notice and Comments*

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 January 24, 2022, Volume 87, Number 15, page 3562, and provided a sixty-day period for public comment. No comments were received during the notice and comment period, X.

*Consultation with Experts Outside of the Agency*  
 No agencies outside of ACF were consulted on these revisions.

**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 MS Access Database 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**

ANA collects the POAS from grant recipients, including Tribal governments, Native American nonprofit organizations, and Tribal Colleges and Universities. Based on experience to date, the estimated time to complete the POAS is 6 hours. Funding recipients provide one over the time of their grant period. The total burden over a three-year period is 510 hours (85 respondents x 1 response x 6 hours per response). This total burden is divided by three to provide an annual average of 170 hours.

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
Project Outcome Assessment Survey (POAS)	85	1	6	510	170	\$36.76	\$6,249.20

We estimated the total cost by using the Bureau of Labor Statistics wage data for Social and Human Services Assistants (job code 21-1093). The mean hourly wage from May 2020 is \$18.38 per hours. To account for fringe benefits and overhead the rate was multiplied by two which is \$36.76. The estimate of annualized cost to respondents for hour burden (inclusive of fringe and overhead) is \$36.76.

<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**

Adjustments to the POAS form were made to allow for ease in completion of the end of project survey. This information collection compliments the On-Going Progress Report (OMB #: 0970-0452). Questions in the POAS were eliminated, re-organized and re-numbered to consolidate questions. For example, some questions were removed because they are no longer analyzed by ANA or the program no longer exists. 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. Therefore, the burden estimate provided remains consistent at six hours. See Attachment A for detailed changes.

**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.