Generic Program-Specific Performance Progress Report (PPR)

OMB Information Collection Request 0970 - 0490

Supporting Statement Part A: Justification

JANUARY 2023

Administration for Children and Families U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

This information collection request (ICR) is to extend data collection under the Administration for Children and Families (ACF) Generic Program-Specific Performance Progress Report (PPR) (0970-0490). This overarching generic has allowed ACF program offices to collect performance and progress data from recipients who receive funding from ACF under a discretionary award. This information is required under 45 CFR 75.342, monitoring and reporting program performance; 45 CFR 75.301, performance measurement; and the GPRA Modernization Act of 2010 (Pub.L. 111-352, Sec 12). This current request expands the overarching generic to include the collection of performance and progress data from recipients who receive funding from ACF under a non-discretionary award¹.

ACF programs award funding to provide services and activities that promote the economic and social well-being of families, children, individuals and communities with partnerships, funding, guidance, training and technical assistance.

According to HHS's GrantSolutions.gov, in FY 2022, ACF issued a total of \$66 billion total in federal financial assistance, including \$768 million in COVID-19 relief programs, through \$27 billion in 9352 discretionary awards, and \$38 billion in federal financial assistance through 13,193 non-discretionary awards. Prior to the use of this generic program-specific PPR, a standard ACF PPR (#0970-0406) was used for all ACF discretionary awards and cooperative agreement awards for post award reporting. Historically, on the standard ACF PPR form, ACF required funding recipients to only respond to a common set of broad questions, which often resulted in qualitative or incomplete information. This one-size-fits-all approach did not adequately collect the specific data needed for particular grant programs or allow program offices to assess continuous quality improvement. Different grant programs vary in purpose, target population, and activities. Therefore, a need for program offices to customize performance measurements was identified and the generic program-specific PPR was developed. Nondiscretionary funding recipients have historically provided performance and progress data through program-specific information collection requests. When subject to the Paperwork Reduction Act, these collections have been approved through full information collection requests.

ACF program offices have benefited from the ability to create and use a program-specific PPR that is more effective and includes specific data elements that reflects a specific program's indicators, demographics, priorities, and objectives. As such, this request is to revise and extend approval to the umbrella generic and extend approval of ongoing GenICs currently approved under this OMB number. This revision proposes to expand the scope of the umbrella generic to also cover non-discretionary funding recipients, if a program wanted to use this mechanism.

2. Purpose and Use of the Information Collection

The overall purpose of the information collections and uses of the data remain the same under this current request for renewal.

¹ For definitions of discretionary and non-discretionary, please see 2 CFR 200: <u>https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-A/subject-group-ECFR2a6a0087862fd2c/section-200.1</u>

A generic program-specific PPR that can be tailored for program-specific needs allows program offices to collect useful data in a uniform and systematic manner. The reporting format allows program offices to gather uniform program performance data from each recipient, allowing aggregation at the program level to calculate outputs and outcomes, providing a snapshot and allowing for longitudinal analysis, including comparative analyses across grantees and/or regions.

Data from a tailored program-specific PPR that demonstrates a program's successes and challenges have been useful for accountability purposes, such as required reports to Congress. Moreover, it has been useful for program management and oversight, such as identifying recipients' technical assistance needs and ensuring compliance with federal and programmatic regulations and policies. This includes, but is not limited to, identifying additional needs for program guidance, development or updates to support for recipients, and making informed refinements to programs in general and the related activities and supports. The information from the program-specific PPRs will also help ACF to ensure recipients comply with program planning and design requirements that are a new requirement for all FY23 funding opportunities (2 CFR 200.202 and 2 CFR 200.329). This includes requirements prior to issuing a NOFO. These consistent elements will allow ACF to then measure recipients' performance and financial data under a risk management lens.

Most ACF funding recipients of discretionary awards will continue to submit the standard ACF PPR (0970-0406) on a periodic basis, unless a program has an alternative approved reporting mechanism. Non-discretionary programs currently require performance progress reports on a program-by-program basis based on the individual program statutes and regulations.

Program offices that decide to develop standardized performance measures for their program can submit the program-specific PPR for review and approval under this umbrella generic clearance. In those specific instances where approval is granted, the program-specific PPR will be used by recipients for additional periodic reports. Submission of reports under the program-specific PPRs will be required to retain a benefit (i.e., the ACF award) (45 CFR 75.342, 45 CFR 75.301, Pub.L. 111-352, Sec 12, 45 CFR Part 96-Block Grants).

The program-specific PPRs will be uncontroversial and provide a significant benefit and ensure federal stewardship and oversight of funding recipient activities. While submission of these reports is required, applying for a grant is a voluntary activity. ACF includes information about performance and progress data that will be expected in all notices of funding, for example in NOFOs, Terms and Conditions, and/or Action Transmittals. Requirements are also included in the governing statue and/or regulation, as applicable.

Attachment B includes the standard ACF-required PPR instrument with data elements.

A program-specific generic IC (GenIC) will be submitted to OIRA for each individual request, along with the Generic PPR submission template (**Attachment A**). GenICs currently approved are available for review on RegInfo.gov: https://www.reginfo.gov/public/do/PRAViewICR? ref_nbr=202301-0970-009.

3. Use of Improved Information Technology and Burden Reduction

Some program offices may use some of form of electronic collection. This could include web pages, email or other online data management systems. Recipients may be required to enter and retrieve information pertinent to their awards through electronic forms closely resembling the paper forms (i.e., fillable PDFs or tailored online data management systems). Such technology support is expected to improve standardization and timeliness of recipient reporting and to ease further analyses of reported data.

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are available.

5. Impact on Small Businesses or Other Small Entities

These collections will not have adverse impact on small entities.

6. Consequences of Collecting the Information Less Frequently

ACF program offices may require reporting occur on a quarterly, semi-annual or annual basis. Less frequent submission would mean funding recipients provide less current information on performance and progress to ACF.

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 July 6, 2022 (87 FR 40245), 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

There are no payments or gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

We will protect respondents' information and data obtained to the extent allowed by Federal law.

Additionally, all funding recipients must adhere to 45 CFR § 75.303 (e) to take reasonable measures to safeguard protected personally identifiable information of program participants.

11. Justification for Sensitive Questions

ACF may request grantees provide information on data that may be considered to be sensitive in nature. For example, data about gender identity or other similar data to support an ACF-wide focus on equity may be requested. This will most commonly be done in aggregate. This information will allow ACF to understand if and how specific groups are being offered services and to provide support to grantees, as needed. Each GenIC will provide information about any data elements that may be considered sensitive.

As noted in the previous section, all funding recipients must adhere to 45 CFR § 75.303 (e) to take reasonable measures to safeguard protected personally identifiable information of program participants.

12. Estimates of Annualized Burden Hours and Costs

Total burden, including previously approved collections that are ongoing in addition to requested burden over the next three years is 19,455 hours (3,255 + 16,200 = 19,455).

Previously Approved and Ongoing Information Collections

The following generic PPRs were previously approved under 0970-0490 and are still in use.

Generic PPR Title	Number of Respondents	Responses per respondent	Hours per response	Burden hours
Administration for Native Americans (ANA) American Rescue Plan Emergency Language (ARP EL) Progress Report and Post Project Report	211	2	0.75	317
Community Collaborations to Strengthen and Preserve Families Semi Annual ACF Performance Progress Report and Racial Equity Supplement	13	2	13	338
Ethnic Community Self-Help (ECSH) Program Data Indicators	31	2	2	124
Head Start Collaboration Office Annual Report	54	1	4	216
Human Trafficking Youth Prevention Education (HTYPE) Demonstration Grant Program Performance Indicators	8	1	6	48
Microenterprise Development Program Indicators	29	2	2	116

Office of Refugee Resettlement Refugee Family Child Care Microenterprise Program Performance Data	15 4 2		2	120
Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant Performance Progress Report	52 1 6		6	312
Refugee Agricultural Partnership Program (RAPP) Indicators	20	2	2.3	92
Refugee Individual Development Accounts (IDA) Program Indicators	26	4	6	624
Refugee Resettlement Refugee Career Pathways Program Performance Data	42	2	5	420
Tribal Maternal, Infant, and Early Childhood Home Visiting Program Form 4: Quarterly Performance Reporting Form	23	4	3	276
Wilson-Fish TANF Coordination Project Performance Report Part A and B	21	2	6	252
	Total Respondents: 545	Average # of Responses: 2.23	Average Burden Hours per Response: 4.47	Total Ongoing Burden Hours: 3,255

Requested Burden for New Generic Information Collections

The burden estimate for the next three years of approval is estimated based on generic PPRs submitted during the first three years of approval (see above) in addition to internal discussions regarding the program office needs in the upcoming years. We have increased the number of respondents to account for the potential use by non-discretionary programs and adjusted average estimated number of responses and burden hours per response based on the experiences and feedback over the past three years and projections for the upcoming three years.

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hour per Response	Total Burden Hours	Average Hourly Wage*	Total Cost
Program Specific PPRs	900	3	6	16,200	\$62.80*	\$1,017,360

*This amount accounts for fringe benefits and overhead.

The cost to respondents was calculated using an average of the following Bureau of Labor Statistics (BLS) job codes:

- 11-9151: Social and Community Service Managers (\$36.92)
- 11-9031: Education Administrators, Preschool and Childcare Center/Program (\$25.87)

The average mean hourly wage is \$31.40. To account for fringe benefits and overhead the rate was multiplied by two, which is \$62.80. <u>https://www.bls.gov/oes/current/oes_stru.htm#11-0000</u>

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

There are no monetary costs to respondents in completing and submitting the program-specific PPR.

14. Annualized Cost to the Federal Government

Costs to the Federal Government are estimated based on about 5% time of a GS-13² for initial creation of the form, data collection and review. This is an estimate of \$5,341.15 per information collection. Based on the past three years, we have multiplied this by 15 collections to estimate a cost of \$80,117.25.

15. Explanation for Program Changes or Adjustments

This is a request for an extension to a previously approved collection. Adjustments to burden estimates reflect changes in the currently approved and ongoing GenICs, updates to estimated average number of responses and burden hours per response (based on feedback, experiences to date, and projections for upcoming years) and the broadened scope to include non-discretionary grants. See A12, subsection *Previously Approved and Ongoing Information Collections* for additional information.

16. Plans for Tabulation and Publication and Project Time Schedule

Data collected from generic PPRs are often published on the ACF website and used to fulfill requirements such as reports to Congress, which are made public. Any plans to publish results will be described in individual ICs under this generic clearance.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.

² Step 1, adjusted for DC area: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf