

# **Objective Work Plan/On-going Progress Report**

**OMB Information Collection Request  
0970 - 0452**

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

**August 2023**

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 Objective Work Plan (OWP) information collection is conducted in accordance with 42 USC of the Native American Programs Act of 1974, 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.

This request is to extend approval of the OWP and the OPR for an additional three years. No changes are proposed. Revisions have been made to the burden estimates to reflect the current number of estimated respondents over the next three years.

## **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. There are no changes proposed to the OPR.

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 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 May 19, 2023 (88 FR 32227) and provided a sixty-day period for public comment. During the notice and comment period, we did not received 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 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	300	1	3	900	300	\$40	\$12,000
OPR	200	2	1	400	133	\$40	\$5,320
<b>Estimated Annual Burden Total:</b>					<b>433</b>	<b>Estimated Annual Cost Total:</b>	<b>\$17,320</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 2022, which is \$20 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$40. The estimate of annualized cost to respondents for hour burden is \$40 times 433 hours or \$17,320. <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**

There are no changes to this information collection. Burden estimates have changed slightly since the most recent approval because the revision in 2020 included burden for grantees to

complete using the 2020 OPR and future burden for completion of a revised version to be implemented in 2021. This request extends approval of only the 2021 version.

**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. OPR's 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.