

Supporting Statement Part A: 0985-0059 Assessment and Evaluation of ACL's American Indian, Alaska Natives, and Native Hawaiian Programs Older Americans Act Title VI; short title: *Assessment and Evaluation of the Title VI Programs*).

A. Justification

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 2023, ACL awarded 290 Title VI three-year grants to tribes/tribal organizations elders for the provision of nutrition and supportive services, and a portion of awardees also received funds for the Native American Caregiver Support Program. The Assessment and Evaluation of the Title VI Programs will examine the effects of the program on:

- Older Indians, their families and caregivers
- Tribal communities
- Intergenerational connections in tribal communities
- Management of the Title VI program

Additionally, the assessment will examine how using COVID supplemental funds impacted Title VI services provided to older adults. This work will help ACL better understand and document the impact of these funds, how service provision changed over time, and what gaps existed despite the additional funding.

The Need for Assessment and Evaluation

The Assessment and 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.”

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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 assessments and 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 Information Collection

Having completed most of the data collection, the Assessment and Evaluation of the Title VI Programs has an interest in adding a data collection activity to do a follow-up interview with 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.

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.

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Information gathered through the Assessment and 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.

Without this assessment and 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 assessments and evaluations have 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 Frequent Collection

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.

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8. Comments in Response to the Federal Register Notice/Outside Consultation

A 60-day Federal Register Notice was published in the *Federal Register* on August 18, 2023, vol. 88, No. 159; pp. 56633-56635. No public comments were received during the 60-day public comment period. A 30-day Federal Register Notice published in the *Federal Register* on November 3, 2023, vol.88, No. TBD, pp. TBD.

Note to ACL OIRA Desk Officer: At time of submittal to OMB the Federal Register returned the 30-day FRN to ACL for electronic certification issues related to the new title block of ACLs *Principal Deputy Administrator for the Administration for Community Living, performing the duties of the Administrator and the Assistant Secretary for Aging*. ACL received confirmation of the publication date on day of expiration for submittal to OMB.

9. Explanation of any Payment/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 Respondents

There are no assurances of confidentiality.

11. Justification for Sensitive Questions

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

12. Estimates of Annualized Hour and Cost Burden

The estimated annualized hour and cost burden for the Assessment and Evaluation of the Title VI Programs is 24 hours.

The data collection timeframes are based on 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).

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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
Program Director	Program staff follow-up interview guide	12	1	1	12
	Title VI COVID Supplement	12	1	1	12
Total		24			24

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

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, 2022) and from the U.S. Department of Labor Federal Minimum Wage Standards.¹

Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Burden per Response	Hourly Wage	Annual Respondent Cost
Program director	Program staff follow-up interview guide	12	1	1	\$35.69	\$428.28
Total		12				\$428.28

The estimated aggregated costs to respondents over the three-year period are \$428.28.

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 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.

¹ The Hourly Wage Rate of \$35.69 per hour derived from the Bureau of Labor Statistics Occupational Employment and Wages Estimates median hourly wage for Social and Community Service Managers. Hourly wage of \$35.69, plus a factor of 100% (\$35.69) to account for benefits and overhead. Link: [Social and Community Service Managers \(bls.gov\)](https://www.bls.gov)

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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 **\$55,929**. The cost breakdown is described below.

This information collection includes approximately 30 percent level of effort of a GS-12²behavioral scientist's time assuming a \$94,191 annual salary. The estimated annualized cost to the Federal Government for oversight by this individual is \$28,257.

15. Explanation for Program Changes or Adjustments

There is a program change increase of 12 annual burden hours. ACL added an assessment that will examine how using COVID supplemental funds impacted Title VI services provided to older adults. This work will help ACL better understand and document the impact of these funds, how service provision changed over time, and what gaps existed despite the additional funding.

16. Plans for Tabulation and Publication and Project Time Schedule

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.

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 Certification for Paperwork Reduction Act Submissions

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

²Federal staff costs based on hourly wage rate of \$39.07 for a Project Officer at the GS 12 level
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf

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