

Extension of AFI Performance Progress Report

**OMB Information Collection Request
0970 - 0483**

Supporting Statement Part A - Justification

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

SUPPORTING STATEMENT A – JUSTIFICATION

This request is for approval and extension (no changes) of the current Assets for Independence (AFI) standard reporting format that expires at the end of August 2019.

The Office of Community Services (OCS) in the Administration for Children and Families (ACF) will continue to use the data collected in the AFI Performance Progress Report (PPR) to prepare the annual AFI Report to Congress, to evaluate and monitor performance of the AFI program, and to continue support for technical assistance efforts. The extension of the PPR will allow AFI program grantees to fulfill AFI Act reporting requirements and program goals.

1. Circumstances Making the Collection of Information Necessary

An ongoing priority at OCS is to improve performance and accountability. Monitoring the AFI program closely, to better measure success and understand AFI's role in supporting grantees, relies heavily on data collected in both the Performance Progress Report- Long Form and Performance Progress Report- Short Form.

PPRs are a critical part of the evaluation strategy for the AFI program and allows OCS to collect program data that supports funding decisions, training and technical assistance, and emphasizes accountability. The standardized reporting format ensures accurate program data is received in a timely, relevant way.

The legislative requirement for the AFI program is in Title IV of the Assets for Independence Act of 1998, section 412, as amended:

“Each qualified entity under this title shall prepare an annual report on the progress of the demonstration project. Each report shall include both program and participant information and shall specify for the period covered by the report the following information:

- (1) The number and characteristics of individuals making a deposit into an individual development account.
- (2) The amounts in the Reserve Fund established with respect to the project.
- (3) The amounts deposited in the individual development accounts.
- (4) The amounts withdrawn from the individual development accounts and the purposes for which such amounts were withdrawn.
- (5) The balances remaining in the individual development accounts.
- (6) The savings account characteristics (such as threshold amounts and match rates) required to stimulate participation in the demonstration project, and how such characteristics vary among different populations or communities.

- (7) What service configuration of the qualified entity (such as configurations relating to peer support, structured planning exercises, mentoring, and case management) increased the rate and consistency of participation in the demonstration project and how such configurations varied among different populations or communities.
- (8) Such other information as the Secretary may require to evaluate the demonstration projects.”

In addition to the Assets for Independence Act specifying what information the AFI program must collect from grantees, section 414 clearly outlines information AFI must provide in the program’s annual report to Congress:

“In evaluating any demonstration project conducted under this title, the research organization shall address the following factors:

- (1) The effects of incentives and organizational or institutional support on savings behavior in the demonstration project.
- (2) The savings rates of individuals in the demonstration project based on demographic characteristics including gender, age, family size, race or ethnic background, and income.
- (3) The economic, civil, psychological, and social effects of asset accumulation, and how such effects vary among different populations or communities.
- (4) The effects of individual development accounts on savings rates, homeownership, level of postsecondary education attained, and self-employment, and how such effects vary among different populations or communities.
- (5) The potential financial returns to the Federal Government and to other public sector and private sector investors in individual development accounts over a 5-year and 10-year period of time.
- (6) The lessons to be learned from the demonstration projects conducted under this title and if a permanent program of individual development accounts should be established.
- (7) Such other factors as may be prescribed by the Secretary.”

2. Purpose and Use of the Information Collection

The primary purpose of the Performance Progress Report- Long Form and Performance Progress Report- Short Form is to collect data in a uniform and systematic manner for the AFI program. These report formats gather uniform data on program performance, the Project Reserve Fund, and account characteristics that ultimately inform reporting on program-level outputs and outcomes.

This PPR is categorized by the following programmatic goals:

- Providing qualified individuals and families an opportunity to save earned income for first-time home purchase, business capitalization, or postsecondary education.
- To increase savings opportunities for individuals and families living at or below 200 percent of the poverty line, and with a net worth of no more than \$10,000.
- Providing training, services, and other assistance to AFI IDA holders.

Annual Report to Congress. By measuring program outcomes, OCS is able to analyze grantee performance and demonstrate program success in the Annual Report to Congress. The report provides Congress with a snapshot of the performance of AFI projects and the impact those projects have on individuals and communities. OCS uses data obtained through the PPR to present grantee performance on key indicators, such as number of AFI IDA holders using earned income for primary asset purchases.

Project Monitoring Tools. OCS develops monitoring tools and dashboards that incorporate data from the PPR. Such tools provide high-level program snapshots, help OCS staff and leadership monitor project progress of participants, and allow for early identification of warning signs and potential grantee challenges so they can be reviewed and addressed quickly.

Technical Assistance. OCS uses the data obtained through the PPR forms to identify grantees in need of technical assistance based on individual grantee outcomes.

3. Use of Improved Information Technology and Burden Reduction

Grantees will submit data to OCS in the PPR format through an online reporting system—the ACF On-line Data Collection System (OLDC). OLDC is the central, web-based reporting tool that can be accessed by grantees and federal staff from anywhere with an internet connection. OLDC was designed to allow HHS grantees to submit grant forms and other data over the internet. The online reporting system reduces the burden on grantees by establishing clear reporting and data collection expectations and ensuring that all grantees provide the data needed for compliance with their grant requirements. OLDC will also enable federal staff to access data easily and track the submission, review, and acceptance of reports.

4. Efforts to Identify Duplication and Use of Similar Information

No other federal agency has the statutory requirement to collect this information; consequently, there is no similar source of information that can be modified for the purpose of collecting required AFI program information.

5. Impact on Small Businesses or Other Small Entities

The Performance Progress Report- Long Form and Performance Progress Report- Short Form have been designed to ensure that the information being requested is held to the absolute minimum necessary for accurate performance data. In addition, the reporting format requires the Performance Progress Report- Long Form only once per year, reducing the burden on grantees. In the development of both the Performance Progress Report- Long Form and Performance Progress Report- Short Form small entities were kept in mind and

unnecessary data fields were removed from the PPRs.

6. Consequences of Collecting the Information Less Frequently

Consistent and timely reporting is necessary in order to track grantees' progress over their five-year project period. In addition to the Performance Progress Report- Long Form, completion of the Performance Progress Report- Short Form will allow OCS staff to identify grantees in need of assistance and respond to best practices in the field. Without the collection of this information, OCS would not have a way of identifying training and technical assistance needs. This data is also necessary for the annual report to Congress, as required by the Assets for Independence Act.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This data collection fully complies with the guidelines of 5 CFR 1320.5

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The first Notice, as required by 5 CFR 1320.8 (d), was published in the Federal Register (Vol. 84, No. 101, Pg. 24156) on May 24, 2019 (<https://www.federalregister.gov/documents/2019/05/24/2019-10863/proposed-information-collection-activity-extension-of-assets-for-independence-afi-performance>). ACF and OCS solicited public comment on the proposed collection. Public comments were due by July 23, 2019. This Notice was also shared with all current grantees via email.

In response to the 60-day notice, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

The information collection does not involve any payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collection does not require an assurance of confidentiality.

11. Justification for Sensitive Questions

The information collection does not include sensitive questions; demographic information is shared in ways that it could not be personally identifiable.

12. Estimates of Annualized Burden Hours and Costs

Table 1. Annual Burden Estimate

Form Name	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours
AFI PPR Short Form	145	1	0.5	72.5
AFI PPR Long Form	145	1	3.8	551
Estimated Annual Burden Hours				623.5

Table 2. Annual Cost Estimate

Form Name	Total Burden Hours	Estimated Hourly Wage*	Total Cost
AFI PPR Short Form	72.5	\$55.85	\$4,049.13
AFI PPR Long Form	551	\$55.85	\$30,773.35
Estimated Burden Cost			\$34,822.48

*Source: Department of Labor; U.S. Bureau of Labor Statistics. OCS works directly with the AFI program grantees who are mostly Senior Executives in the Community Organization industry. Job Code: 11-1010. <https://www.bls.gov/ncs/ocs/sp/nctb1493.txt>. Bureau of Labor Statistics, National Compensation Survey Table 19- Full-time private industry workers: Hourly wage percentiles (1)

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

The information collection does not involve additional annual direct costs to respondents, beyond the burden described under item 12.

14. Annualized Cost to the Federal Government

The renewal of these forms will require no additional time or costs to the Federal Government as this reporting format is already underway.

15. Explanation for Program Changes or Adjustments

This is a request for extension with no changes. There are no program changes or adjustments, however Annual Burden Estimates have been adjusted in response to no funds being appropriated for the AFI program for federal fiscal year 2017 and on. AFI grants awarded in FY 2016 and before are not affected by the FY 2017 appropriation, as the total award amount was obligated for those grants at the time they were made. As such, the number of AFI program grantees whom will still be responsible for continuing to operate those projects and adhere to the AFI Programmatic reporting requirements will be 145.

16. Plans for Tabulation and Publication and Project Time Schedule

The AFI PPR Short Form and AFI PPR Long Form will be submitted by grantees through the On-line Data Collection System (OLDC). Grantees are required to submit the AFI Performance Progress Report- Short Form on April 30, October 1 to March 31, during each year of their grant. Grantees are required to submit the AFI Performance Progress Report- Long Form on November 30, October 1 prior year to September 30 current year (complete federal fiscal year) during each year of their grant. Each PPR submission will be reviewed and used for data analysis for overall program reports as well as individual grantee monitoring reports throughout the year.

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

OCS will clearly display the OMB approval number, expiration date, and other required information on the information collection forms.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

OCS is not seeking an exception to certification for this data collection.