

A. Justification

**1. Circumstances Making the Collection of Information Necessary**

The Older Americans Act (OAA), P.L. 89-73, enacted July 14, 1965, last amended in April 2016, P.L. 114-144, sections 601-643 requires the Department to promote the delivery of supportive services, including nutrition services to American Indians, Alaskan Natives, and Native Hawaiians.

The Administration for Community Living (ACL) is responsible for administering the Title VI A/B (Nutrition and Supportive Service) and C (Caregiver) grants. As prescribed by the Older Americans Act Section 612(a), 614(a) and 45 CFR 1326.19 related to the eligibility of Federally-recognized Tribes and Native Hawaiian organizations for grant funds under this program and their capacity to deliver services to elders.

The Application for Older Americans Act, Title VI A/B and C Grants collects information on the ability of federally-recognized American Indian, Alaskan Native and Native Hawaiian organizations to provide nutrition, supportive, and caregiver services to elders within their service area.

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

ACL is responsible for administering the Title VI A/B (Nutrition and Supportive Service) and C (Caregiver) grants. The purpose of this data collection is to improve and standardize the format of the application. The Application for Older Americans Act, Title VI A/B and C Grants collects information on the ability of federally-recognized American Indian, Alaskan Native and Native Hawaiian organizations to provide nutrition, supportive, and caregiver services to elders within their service area. Applicants are required to provide a description of their organization's service area, the number of eligible elders in their service area, and their ability to deliver services and sign assurances that the organization will comply with all applicable laws and regulations.

This is a new data collection. In prior grant cycles, AoA used ACL's generic clearance for the funding opportunity announcement (FOA) information collection currently approved under OMB control number 0985-0018. The proposed data collection materials have been updated to better align with the requirements of the Older Americans Act and Federal regulations, as well as to improve data quality and grantee accountability. The grant application serves as the collection activity for grantees to meet funding recipient requirements and includes the data required by the OAA to provide Title VI funding to programs. The application provides summary information on services for seniors and family caregivers provided or managed by American Indian, Alaskan Native, and Native Hawaiian organizations. Data is submitted every three years by prospective Title VI grantees. It includes information on the number of people the program intends to serve, the needs of the elders the program intends to serve and how the program intends to meet those needs.

Furthermore, this grantee application will better line up with the revised Title VI Program Performance Report under OMB 0985-0059 and will eliminate duplicate reporting requirements for grantees. This data collection will also support ACL in tracking performance outcomes and efficiency measures with respect to the annual and long-term performance targets established in compliance with the Government Performance Results Modernization Act (GPRMA).

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

The application is available in electronic form on [www.grants.gov](http://www.grants.gov).

**4. Efforts to Identify Duplication and Use of Similar Information**

No other sources collect this specific data or similar information that could be used for this purpose.

**5. Impact on Small Businesses or Other Small Entities**

Reporting is performed by Title VI grantees (tribes, tribal consortia, and other Native organizations). No small businesses or other small entities will be involved in this information collection.

**6. Consequences of Collecting the Information Less Frequent Collection**

Applicants submit only one application for each funding opportunity.

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

- **Requiring respondents to report information to the agency more often than quarterly;**

Not applicable. Applications are only required every three years.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Not applicable.

- **Requiring respondents to submit more than an original and two copies of any document;**

Not applicable.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

Not applicable.

- **In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**

Not applicable.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Not applicable.

- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

Not applicable.

- **Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

Not applicable.

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

A 60-day Federal Register Notice was published in the *Federal Register* on June 3, 2019 Vol. 84, No. 106, pp. 25546-25547. ACL received public comment from one organization about the changes to the Title VI grant application during the 60-day public comment period. All comments were related to clarifications of what was meant in the application and have been taken under advisement. For ease of review, ACL has included the comments and responses to each comment below.

<b>Comment</b>	<b>ACL Response</b>
Can the number of non-enrolled Indian residents age 60+ be counted as part of this question, since we are providing services to them also?	Yes. Applicants may use either tribal enrollment or Census numbers to determine the number of eligible Native elders being served. If using the tribal enrollment numbers applicants may ask for certifications from the tribal enrollment official accounting for any additional non-enrolled Native elders over the age of 60.
Are you asking that the applicant count any/all non-tribal/non-Indian elder residents or provide number of Indian	This should only be Native elders. ACL appreciates the comment and will update language accordingly to specifically refer to Native elders.

elders only?	
Precise instruction for this question might be beneficial, for example: add line #___ + line #___ = _total How important is this answer, and will the count require certification/verification?	ACL does not require for this number to be verified or certified.
What is being asked of the applicant; to describe in writing the “planned service area” or to provide a map of the “planned service area” or both?	ACL would like a map that is reflective of the service area. Therefore bot a map and a description of which portions represented on the map are part of the planned service area are required. ACL will update the language in the application to reflect this.
Describe the nutrition and supportive services programming your program will provide and how your program will deliver the services. Recommended replacement - Describe the nutrition and supportive services your organization will provide (provide examples; _____, _____, _____, etc.); and describe how these services will be delivered consistently (provide examples: _____, _____, _____, etc.) across the entire Planned Service Area.	ACL has updated the language as suggested.
PAGE ONE the combination of Part A & C is one choice for the applicant. However, on page 12 the Sub-header reads “Complete this section (only if) you are applying for Part C funds. A bit confusing.	ACL has updated the language to make it clearer that only those applying for Part C funds should fill out the final section of the application.

A 30-day Federal Register Notice published in the *Federal Register* on August X, 2019 Vol. 84, No. XXX, pp.

**9. Explanation of any Payment/Gift to Respondents**

Not applicable.

**10. Assurance of Confidentiality Provided to Respondents**

No personally identifiable information is requested or accepted from applicants; there are no assurances of confidentiality.

**11. Justification for Sensitive Questions**

No information of a sensitive nature is being asked or collected.

## **12. Estimates of Annualized Burden Hours (Total Hours & Wages)**

Title VI grant applications are required once every three (3) years, so an annual response is not required for this instrument (the annual burden below reflects this calculation). Additionally, Title VI funding is broken into three categories. Parts A and B are for nutritional and supportive programming, with Part A being restricted to American Indian and Alaska Native grantees, and Part B restricted to Native Hawaiian grantees. Part C is for caregiver programming. All Part C grantees must have Part A/B funding, but not all Part A/B grantees will have Part C programs. Therefore, there are likely to be 295 unique respondents, but only 250 will have to complete all three portions of the application. This application covers all three parts of Title VI.

ACL estimates the burden associated with this collection of information as follows:

Respondent/Data Collection Activity	Number of Respondents	Responses Per Respondent	Hours Per Response	Annual Burden Hours
Title VI Application Part A/B	295	1	2.75	270.4
Title VI Application Part C	250	1	1.5	125
Total:			4.25	395.4

The number of burden hours associated with the Title VI, Part A/B application was calculated as 811.25. However, since this instrument is used only once every 3 years, this number was annualized by dividing it into thirds. This resulted in an annualized number of 270.4 hours. Similarly, the total hours associated with the Title VI, Part C application is 375. This number was annualized by dividing it by three, resulting in an annual burden hours of 125.

## **13. Estimates of other Total Annual Cost Burden to Respondents or Record-keepers/ Capital Costs**

There are no additional costs to the projects beyond those already identified in Item 12 above.

## **14. Annualized Cost to Federal Government**

The total Federal burden hours for two staff spent reviewing and approving applications are estimated to be 200 hours annually each. The average salary rate of a GS-13 is \$47.52 per hour<sup>1</sup> for a total of \$9, 504. Factoring in 100% to account for benefits and overhead; the total estimated annualized cost for a GS-13 totals \$19, 008.

The average salary rate of a GS-12 is \$39.96 per hour for a total of \$7,992. Factoring in 100% to account for benefits and overhead; the total estimated annualized cost for a GS-12 totals

<sup>1</sup> Federal staff costs based on 2019 hourly wage rate of \$47.52 for a Project Officer at the GS 13 level and \$39.96 for a Project Officer at the GS 12 level. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx) Accessed June 2019.

\$15,984. The total estimated annualized cost to the Federal Government is \$ 34,992.

Staff Hours/Costs

Grade 13: 200 hrs. X \$95.04 per hour	\$ 19,008
Grade 12: 200 hrs. X \$79.92 per hour	\$ <u>15,984</u>
Total Cost to Federal Government	\$ 34,992

**15. Explanation for Program Changes or Adjustments**

This is a new data collection request. There is a program change increase of 395.4 annual burden hours.

**16. Plans for Tabulation and Publication and Project Time Schedule**

No tabulation or publication is planned.

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

We are not seeking approval to not display the expiration date for OMB approval of the information collected.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to this request for certification.

**Supporting Statement Part B.**

**Collection of Information Employing Statistical Methods.**

This information collection does not employ statistical methods.