

SUPPORTING STATEMENT  
FOR TITLE VI PROGRAM PERFORMANCE REPORT

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

A Program Performance Report on activities under Title VI of the Older Americans Act (OAA) is necessary for the Administration of Community Living (ACL) to monitor federal funds effectively and to be informed as to the progress of the programs. Grantees are required to submit an annual Program Performance Report to allow for efficient federal monitoring.

Sections 614(a)(3), 202(a)(16)(A)(i)(ii)(iii) and 207(a) of the OAA state that an applicant for a grant under Title VI Part A, Indian Program, shall “provide that the tribal organization will make such reports in such form and containing such information, as the Assistant Secretary may reasonably require, and comply with such requirements as the Assistant Secretary may impose to assure the correctness of such reports.” Section (624)(a)(4) of the OAA states that an applicant for a grant under Title VI Part B, Native Hawaiian Program, shall “provide that the organization will make such reports in such form and containing such information as the Assistant Secretary may reasonably require, and comply with such requirements as the Assistant Secretary may impose to ensure the correctness of such reports” Section 373(e)(3) of the OAA states that an applicant for a grant under Title VI Part C, Native American Caregiver Support Program shall “prepare and submit to the Assistant Secretary reports on the data and records required under paragraph (2), including information on the services funded under this subpart, and standards and mechanisms, by which the quality of the services shall be assured.” A combined Program Performance Report form is used for reporting by grantees under Parts A, B and C. The regulations at 45 CFR 92.40(b)(1) provide that “grantees shall submit annual performance reports unless the awarding agency requires quarterly or semiannual reports.” Again, we require annual reports.

ACL is submitting a reinstatement without change request to the Office of Management and Budget (OMB) a form for the Program Performance Report. The report is required annually, with a 2.5 estimated preparation time per report.

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

The Program Performance Report provides a data base for ACL to: (1) monitor program achievement of performance objectives; (2) establish program policy and direction; and (3) prepare responses to Congress, the OMB, the General Accounting Office, other federal departments, public and private agencies as required by the OAA Title II sections 202(a)19 and 208. To prepare data for the Federal Interagency Task Force on Older Indians established pursuant to section 134(d) of the 1987 Amendments to the OAA. If ACL did not collect the program data herein requested, it would not be able to monitor and manage total program progress as expected, nor develop program policy options directed toward assuring the most effective use of limited Title VI funds.

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

A web based reporting system is in place reducing the cost of mailing reports to ACL and ensuring that reports are received in a timely manner. However, due to the geographical location and size of some Tribal grantees, paper reports are also accepted.

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

Title VI funds are used to provide specific services to distinct target populations, American Indian and Alaskan Native elderly living on or near reservations; Native Hawaiians and Caregivers caring for American Indian, Alaskan Native elderly living on or near reservations and Hawaiian elders. Other federal programs may provide some services to some of the American Indians and Native Hawaiians and Caregivers but they do not generate data specifically about services provided by the Title VI programs.

No similar information is available.

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

OAA Title VI grantees are Tribal organizations representing tribal governments; therefore, we view them as local government entities.

### **6. Consequences of Collecting the Information Less Frequently**

Annual reporting allows Tribes to analyze their actual performance against their originally stated goals and objectives. ACL carefully monitors the reports to determine accuracy of reported information and contacts grantees to discuss any questionable responses. This approach offers an opportunity for training, technical assistance and monitoring.

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

There are no special circumstances relating to the guidelines of 5 CFR 1320.5

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

ACL published a 60-day Federal Register Notice on July 15, 2020 Volume 85, Number 136, pages 42857-42858; ACL did not receive any public comments during the 60-day FRN.

A 30-day Federal Register Notice published on October 23, 2020 Volume 85, Number 206, pages 67547-67548.

### **9. Explanation of Any Payment or Gift to Respondents**

No payments, gifts to respondents or other remunerations of contractors or grantees have been provided.

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

Individuals are not identified in the report and there are no assurances of confidentiality.

## **11. Justification for Sensitive Questions**

The report does not include questions of a sensitive nature.

## **12. Estimates of Annualized Burden Hours and Costs**

There are 263 respondents, reflected is the number of grant awards we expect to be issued and monitored using this program progress report format based on FY 2020 forecast data for new grants and our official electronic grant system, Grant Solutions, for non-competing continuations.

The burden estimate is specific to the type of work done by the grantees that use this reporting format; ACL estimates it takes 3.49 hours to complete the Title VI PPR.

With 282 respondents taking 3.49 hours per performance report, annual burden hour totals 984 hours.

<b>Respondent/Data Collection Activity</b>	<b>Number of Respondents</b>	<b>Responses Per Respondent</b>	<b>Hours Per Response</b>	<b>Annual Burden Hours</b>
Title VI PPR	282	1	3.49	984
<b>Total:</b>				<b>984</b>

### Estimated Annualized Cost to Respondents Based on Burden Hours:

3.49 hours at an average of \$61.64 per hour<sup>1</sup> totals: \$215.12

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

ACL has assessed potential for Offset and mailing costs to the respondent. These costs are estimated at 2367 pages at 10 cents per page totals \$236.70.

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<sup>1</sup>The Hourly Wage Rate of \$30.82 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 \$30.82, plus a factor of 100% (\$30.82) to account for benefits and overhead. Link: <https://www.bls.gov/oes/current/oes119151.htm>

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

<b>Government Burden Hour Estimate per Task</b>	<b>Hours</b>
Dissemination of report instructions to field	16
Regional office review of reports from Title VI grantees, and consultation with Grantees (1 hour per annual report for 263 grantees)	263
Central office analysis and compilation of report for dissemination	100
Dissemination of report of nationwide program	30
	<b>409.0</b>

The

estimated annualized cost to federal government is \$31,959.

The total Federal burden hours for staff, spent reviewing and analyzing the program data estimated to be 409 hours annually.

For a Program Officer at a GS-12 step one taking 409 annual burden hours to review and follow-up with grantees at an average salary rate of \$39.07 per hour<sup>2</sup> the annual cost totals \$31,959.

At a salary rate of a GS-12 \$78.14 per hour factoring in 100% to account for benefits and overhead; the total estimated annualized cost to the Federal Government is \$31,959.

409 hrs. X \$78.14 per hours = 31,959

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

There are no program changes or adjustments.

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

ACL submits an annual report to Congress and the reporting data is included in that report.

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

There is no reason display of OMB expiration date would be inappropriate.

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

There are no exceptions to certification for paperwork reduction act submissions.

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<sup>2</sup>Federal 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](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf)