Office of Community Services

Tribal Consultation Report

August 28, 2015

Background

Assets for Independence Program Overview

Assets for Independence (AFI) is a federal program administered by the Office of Community Services (OCS), which is part of the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services (HHS). The authority for the AFI program is The Assets for Independence Act, Title IV of the Community Opportunities, Accountability, and Training and Educational Services Act of 1998, as amended, Pub.L. 105-285, (42 U.S.C. § 604 note).

AFI is a competitive, discretionary grant program that enables eligible organizations to implement and demonstrate an assets-based approach for supporting low-income individuals and their families. Tribal governments that apply jointly with 501(c)(3) non-profit organizations are eligible for AFI grants. AFI grantees enroll eligible participants to save earned income in special-purpose, matched savings accounts called Individual Development Accounts (IDAs). Every dollar of earned income that a participant deposits into an AFI IDA is matched (from $1 to $8 in combined federal and non-federal funds) by the AFI project, promoting savings and enabling participants to acquire a lasting asset. AFI participants use their IDAs and matching funds for one of three allowable assets: a first home, a business, or post-secondary education or training.

In FY 2014, the AFI program awarded 44 grants totaling $9.97 million. The FY 2014 enacted funding level for AFI was $18.95 million. AFI has a non-federal cash matching requirement. Applicants must document commitment of non-federal funds for their AFI project equal to the grant amount requested. Award amounts range from $10,000 to $1,000,000.

AFI Performance Progress Report Proposal

OCS is proposing to create an AFI program specific Performance Progress Report (PPR) to replace two current AFI reports: the semiannual standard form performance progress report (SF-PPR) and the annual data report. The AFI PPR would collect data on project activities and attributes similar to the reports that it is replacing. OCS plans to use the data collected in the AFI PPR to prepare the annual AFI Report to Congress, to evaluate and monitor the performance of the AFI program overall and of individual projects, and to inform and support technical assistance efforts. The AFI Act requires that organizations operating AFI projects submit annual progress reports, and the AFI PPR would fulfill this requirement.

Under the Paperwork Reduction Act of 1995, federal agencies must seek approval from the Office of Management and Budget (OMB) to collect information from the public. OCS is going through the OMB approval process for the AFI PPR, which takes several months and includes

two public comment periods. OCS has completed the first open comment period for the AFI PPR. The second comment period will be announced in the Federal Register.

OCS has proposed that the AFI PPR would be submitted quarterly: three times per year using an abbreviated short form and one time using a long form. Both draft data collection instruments are available for review at http://idaresources.acf.hhs.gov/AFIPPR. AFI grantees would submit the proposed AFI PPR long form once each year for each grant, providing detailed data on activities and performance through the end of the federal fiscal year (Sept. 30). The AFI PPR long form has been proposed to be due November 30, approximately 60 days after the reporting period end date. In order to monitor grant performance on key indicators throughout the year, the abbreviated AFI PPR short form would be required for each grant three times a year. Short form deadlines would be aligned to the OMB standard quarterly reporting schedule, 30 days after the reporting period end date.

As stated above, the AFI PPR would replace both the semiannual SF-PPR due on April 30 and October 30 and the annual data report that has been due on December 1. With the implementation of the AFI PPR, AFI grantees would no longer be asked to complete the SF-PPR and the data report.

OCS anticipates that the AFI PPR would be submitted through the On-Line Data Collection (OLDC) system. The OLDC system was designed to allow HHS grantees to submit grant forms and other data over the internet. Where possible, OCS plans to incorporate field pre-population and calculation into the AFI PPR online data collection form in order to minimize grantee burden and prevent errors. Additionally, OCS would provide grantees with training and support on using the OLDC system and on this transition overall.

Consultation Information
In order to consult with tribal leaders on this proposal, OCS held a virtual consultation on Monday, July 6 from 2-3:30 PM Eastern Time. Notification of this consultation was achieved via a Federal Register Notice published on June 11 and via letters to Tribal leaders mailed on June 11. Tribal leaders that were not able to participate in the July 6 consultation were invited to submit written testimony. OCS did not receive any written testimony.

The July 6 consultation was facilitated by Jeannie Chaffin, Director of OCS, and Liz Mueller, Vice Chairwoman of Jamestown S'Klallam Tribe and Chair of the ACF Tribal Advisory Committee. A full transcript of this consultation will be released with this report. Other than Liz Mueller, no Tribal leaders participated in the consultation, so there was no testimony or official consultation with the tribes.

There were Tribal members that participated and asked questions about the AFI program and about the PPR proposal. For example, Dawn Hix with the Choctaw Nation of Oklahoma asked about the timeline for implementing the proposed PPR and how the proposed PPR would impact the data management system that Choctaw currently uses. Jeannie responded that the timeline is dependent on the OMB approval process. Regarding the data management system, Jeannie noted that these are operated by private companies and that various systems are used by AFI grantees. She encouraged Dawn to talk directly to the data management system firm that

Choctaw uses. Dawn also noted that Choctaw does not currently collect some of the data requested on the proposed PPR, specifically related to participant information at the time of asset purchase. The other comments and questions were more general questions about the AFI program rather than the PPR proposal.

<u>Conclusion</u>
For the OMB approval process, OCS has to submit a package that addresses comments received on the PPR proposal during the first open comment period. OCS will incorporate information from the July 6 virtual tribal consultation into that package and into plans for providing grantees with training and technical assistance with the PPR if it is approved by OMB.