

RSA has been asked to elaborate on the public comments received on this collection instrument (question A8) and explain the changes that were made in response to public comments.

Response for Rachel Potter:

During prior revisions and extensions of this collection instrument, RSA has received both formal and informal comments from OMB, RSA staff, the National Disability Rights Network (NDRN), formerly known as the National Association of Protection and Advocacy Systems (NAPAS), and most significantly, CAP grantees, on the content of the form.

Suggestions from all sources were considered during revisions of the form and are reflected therein.

Report Form RSA -509 and Form RSA-227 as presented, were extended through March 31, 2006 for the purpose of collecting data and information concerning the program activities carried out during fiscal year 2005 only. RSA was required by OMB to consider revisions to the reporting instrument based on the work of the Interagency Workgroup on Common Definitions for P&A Reporting, and adopt those data elements applicable to the programs. The workgroup met several times during the year and appropriate revisions were made to the instrument as per the recommendations of the workgroup.

OMB did not approve the changes to this form as proposed by RSA. Instead, OMB approved the previously approved version of the reporting instruments for an 18-month period while the Federal P&A workgroup completes its ongoing review of the P&A annual reporting forms. Upon resubmission of these forms for OMB approval, RSA will make revisions in accordance with the findings of the Federal P&A workgroup.

Any revisions based on public comments were already included in the previously approved version of the reporting instruments; therefore, no further changes were considered necessary.