

SUPPORTING STATEMENT

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The National Institute on Disability Rehabilitation Research (NIDRR or the Institute) provides support to research and related activities in the area of disability through grants. Authorized by the Rehabilitation Act of 1973, as amended, and the program regulations under 34 CFR Parts 350-360, which apply to this information collection. Based on the authority and program regulations, NIDRR's mission is to generate new knowledge and promote its effective use to improve the abilities of people with disabilities to perform activities of their choice in the community, and also to expand society's capacity to provide full opportunities and accommodations for its citizens with disabilities. Toward this end, NIDRR conducts comprehensive and coordinated programs of research and related activities to maximize the full inclusion, social integration, employment and independent living of individuals of all ages with disabilities. NIDRR's focus includes research in areas such as employment; health and function; technology for access and function; independent living and community integration; and other associated disability research areas. Awards are made on the basis of competitively reviewed applications. The Department is requesting approval of this grant application package for the information used to apply for new grants. A final rule is attached based on the 1992 Amendments to the Rehabilitation Act.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The grant application package is necessary to standardize applications for the many programs in NIDRR with the least amount of burden to the applicants. The selection criteria used is program specific. Without the information contained in this application package, the Department would not be able to effectively comply with the legislative mandate and conduct expert peer reviews to make grant funding decisions. Applicants, including individuals and small for and non-profit businesses, may elect to apply for grants at their own option. The information required by the government is minimal. The Institute discourages elaborate or lengthy applications. Most applicants elect to submit far more information than the Institute requires. This application package is used for the following programs: 133A, Disability Rehabilitation Research Projects; 133B, Rehabilitation Research and Training Centers; 133E, Rehabilitation Engineering Research Centers; 133F, Research Fellowship; 133G, Field Initiated Project; 133N,

Special Projects and Demonstrations for Spinal Cord Injuries Program; and 133P, Advanced Rehabilitation Research Training Project.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The Department intends to provide access instructions for electronic ED standard forms -- ED 424 and ED 524 (OMB No. 1890-0004) to record much of the information required by P.L. 106-554, some of the required information items are outside the scope of these forms. The Department intends to continue to use Grants.gov APPLY and the e-Reader module of the U.S. Department of Education's e-Grants Web Portal processes for this program to expedite the application review and project awards. Concurrently, this electronic process is intended to reduce applicant burden.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

As stated in Item 3, the Department intends to use ED standard forms to collect basic descriptive applicant information. In addition, applicants for discretionary awards submit applications on a voluntary basis for discrete projects. Duplication of other collection efforts is not an issue, so similar information is not already available. NIDRR priorities change from year to year, so that applications for funding will necessarily be different.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Applicants, including individuals and small for and non-profit businesses, may elect to apply for grants at their own option. The information required by the government is minimal. The Institute discourages elaborate or lengthy applications. Most applicants elect to submit far more information than the Institute requires. In keeping with the legislative and regulatory intent of NIDRR's programs, the Department has developed this uniform and consolidated grant application package.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The Department would not comply with the legislative mandate (P.L. 106-554) if this collection were not conducted each year in which its extramural R/R&D budget exceeds \$100 million.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- 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;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- 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.

At the discretion of the applicant, proprietary information may be included in an application. This would be for the purpose of explaining the proposed research and/or research and development activity. Confidentiality assurances and information protection mechanisms are explained in item 9.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe

actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

One portion of the application package contains standard Federal forms (e.g., SF 424) that request minimal needed information. Telephone conversations with hundreds of potential applicants in the past three years have led to the clarifying instructions in the package. Other materials in the package are program regulations, application-rating forms based on program regulations, and instructions for the completion of the narrative. Extensive discussions have been held and public comments taken on the program regulations and NIDRR's Long-Range Plan. The rating forms are based on selection criteria in the program regulations, and their format is based on discussions with peer reviewers and applicants in prior years. The Institute provides guidelines in the application package that encourage applicants to limit the number of pages and amount of information that they submit.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts to respondents other than the remuneration of grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The agency retains applications in a secure room during the review process and destroys any duplicates after the review. An original copy of the application and peer review comments are sent to the Federal Record Center for a 3-year period then destroyed. Peer reviewers contract with the agency not to disclose any information about applications they review.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification

should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should :

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-1.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.

Estimates of Hour Burden for this Information Collection:

Number of Applications	650
Hours Needed to Complete .	200
Total Burden Hours	130,000

Estimated total percentage of applicants for the 133A, Disability Rehabilitation Research Projects; 133B, Rehabilitation Research and Training Centers; 133E, Rehabilitation Engineering Research Centers; 133F, Research Fellowships; 133G, Field Initiated Projects; 133N, Spinal Cord Injury Model Systems; 133P Advanced Rehabilitation Research Training programs.

30% Institutes of Higher Education
40% State (includes State Universities)
19% Not for Profit
10% For Profit
1% Individuals

Estimated total average number of application, percentage and hours by individual programs.

<u>Program</u>	<u>Average # of Applications</u>	<u>% of 650 estimated #</u>	<u>Estimated Hours</u>	<u>Amount</u>
133A	125	19.23%	25,000	\$ 700,000
133B	25	3.85%	5,000	\$ 140,000
133E	30	4.62%	6,000	\$ 168,000
133F	75	11.54%	15,000	\$ 420,000
133G	350	53.85%	70,000	\$1,960,000
133N	35	5.38%	7,000	\$ 196,000
133P	10	1.53%	2,000	\$ 56,000
Total	650	100%	130,000	\$3,640,000

Estimates of Annual Cost Burden to Respondents for this Information Collection:

Preparation of Application (\$28.00 per hour X 200 burden hours*)
 \$5,600
 Postage and Printing (\$50.00 per application X 0 applications**)
 \$ 0
 Total Cost Burden \$560,000

*Based on discussions with current grantees 200 is an average number of hours.

**Based on recent experiences, it is assumed, that between 500 and 750 applications will be received in any year.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection

services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Total Annualized Capital/Startup Cost : \$.00
Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : \$.00

There are no start-up costs for this collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimates of Annualized Cost to the Federal Government:

NIDRR uses an average of 5 to 7 reviewers per panel. The number of panels change based on the number of priorities and the number of awards received per competition.

OSERS, including NIDRR, have a contractor to assist program staff to organize, mail, contact peer reviewers for the grant competitions.

COST FOR PEER REVIEW PROCESS For 84.133A/B/E/F/G/N/P

Background Information

NIDRR individual staff time for peer review is estimated at 20% of time. This includes: (1) Review of Applications; (2) Recruitment of Reviewers; (3) Review of peer reviewer material; (4) Actual Competition; and (5) Pre-Funding and Competition Slate preparation.

Contractor Staff Time is based on approved contract. In FY 2007, the estimated cost for 20 competitions is \$757,262, which equals \$37,863 average contractor cost per competition.

Peer Reviewer reimbursement is estimated at \$200.00 per 3 days of Peer Review and \$200.00 for one day preparation to total \$800.00. Per Diem is figured at the Washington DC rate of 3 nights stay at \$188.00 per night (\$564) and M&IE at \$96 per day (\$288). Average cost per reviewer per day is \$284.00 and for 3 days is \$852.00. The number of reviewers ranges from 4-7 per competition with an average of 5. For the purposes of these charts below, we are using 5 reviewers, with the exception of the 133G competition where 7 reviewers are used.

Number of Competitions is based on the estimate of FY 2007 numbers.

OVERALL COST FOR ELECTRONIC PEER REVIEW PROCESS

NIDRR Staff Per Person	Contractor Staff Time	Peer Reviewer Time (5 reviewers)
\$20,067.84	\$37,863	\$4,000.00

BY PROGRAM COST FOR ELECTRONIC PEER REVIEW PROCESS

Program	Number Of Competitions	NIDRR Staff Per Person	Contractor Staff Time	Peer Reviewer Time
133A	2	\$40,135.68	\$75,726	\$8,000.00
133B	1	\$20,067.84	\$37,863	\$4,000.00
133E	7	\$140,474	\$265,041	\$28,000
133F	1	\$20,067.84	\$37,863	\$4,000.00
133G-2	1	\$20,067.84	\$37,863	\$5,600.00*
133P	1	\$20,067.84	\$37,863	\$4,000.00

* 133G-1 uses 7 reviewers instead of the average 5 reviewers.

There is no 133N competition in FY 2007, but it is one competition.

133N	1	\$20,067.84	\$37,863	\$4,000.00
------	---	-------------	----------	------------

OVERALL COST FOR IN-PERSON PEER REVIEW PROCESS

NIDRR Staff Per Person	Contractor Staff Time	Peer Reviewer Time/Travel/Per Diem (5)
\$20,067.84	\$37,863	\$8,260.00

BY PROGRAM COST FOR ELECTRONIC PEER REVIEW PROCESS

Program	Number Of Competitions	NIDRR Staff Per Person	Contractor Staff Time	Peer Reviewer Time (5)
133A	2	\$20,135	\$75,726	\$16,520.00
133G-1	1	\$20,067.84	\$37,863	\$57,820.00*

* 133G-1 uses 7 reviewers instead of the average 5 reviewers.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

Applicants may increase due to the dissemination of NIDRR’s priorities and regulatory programs to spread the word on availability of funds. This has been accomplished through increase visibility and outreach by the NIDRR Director and staff. Posting competitions on the Grants.gov website has increased interest for these applications. Change from the current 20,000 burden hours to 130,000 is based on discussions with applicants.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Department posts a Forecast of Funding outlining both proposed and actual dates of the competitions. NIDRR posts the successful applicants on their on-line program directory through a contractor.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

OMB approval of this collection with the expiration date will be displayed

18. Explain each exception to the certification statement identified in Item 20, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There are no exceptions to the Certification Statement.

B. Collection of Information Employing Statistical Methods