

\Justification

1. Circumstances Making Collection of Information Necessary

The Rehabilitation Services Administration (RSA) is seeking approval to extend the approved OMB Form # 1820-0018 which consists of the material for the RSA discretionary grant application package, which falls under the Streamline Clearance Process for Discretionary Grant Information Collections 1890-0001. The application package is used in the processing of awarding new grants for those discretionary programs administered by the Rehabilitation Act of 1973, as Amended, the Helen Keller National Center (HKNC). The current application package expires on February 28, 2007, and in order for RSA to continue to provide application packages to applicants, RSA requests an extension on this collection for the maximum of three years.

2. Use of Information and Consequences If Not Collected

These application instructions are required so that all applications will be completed in accordance with the specific and unique requirements of the various RSA discretionary programs and (HKNC). Program staff and outside reviewers use the application information to evaluate project viability, soundness of approach and reasonableness of the proposed cost for new projects. Applications are subjected to a competitive, objective review by an independent panel of external experts, as a part of the review process. Uniform instructions for the preparation of applications are required if the competitive process is to be used successfully in awarding new grants to the best qualified applicants. This collection of information is also necessary for RSA's annual report to Congress.

3. Use of improved Technology (and Other Means) to Reduce Burden

As has been the process for several years, RSA's application packages for specific competitions are posted on the Department's website (<http://www.edgov/>). RSA participates in the Department's mandatory electronic submittal of applications. The Department participates in Grants.gov which is an electronic portal used by a number of Federal organizations for the discretionary grant process.

4. Efforts to Identify Duplication

The information supplied in these applications is not duplicated in any other information collection. The information provided by applicants is used in order to competitively award new Federal funds to support projects consistent with the intent and purpose of authorizing legislation. No information is available from any other source which enables the Department to evaluate the qualifications of applicants seeking new funding.

5. Small Business Involvement

It has been determined that there is no impact on small businesses or other small entities. A small entity may be defined to be: (1) one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprises that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

6. Consequences of Less Frequent Data Collection

The information collected is required as a minimum evaluating the capacity of each applicant to develop a comprehensive approach, including problem identification, design

and methodology, qualifications of key personnel, adequacy of resources and budget justification in response to

specific component priorities. This information is required to assist reviewers and program staff determine which proposal(s) should be supported, consistent with the intent and purpose of its authorizing legislation.

7. Special Circumstances

Data collection is consistent with 5CFR 1320.5, and, therefore, the special circumstances required.

8. Consultations with Persons outside the Agency

This application is consistent with other applications, which have a long history of public acceptance. With the exception of the supplemental budget information requested standard Department of Education forms and instructions are used in the collection of information and instructions are used in the collection of information. Supplemental instructions are included only when absolutely necessary. The additional budget information and instructions incorporated in the application package are a result of informal discussions with applicants requesting assistance in the preparation of their applications, peer reviewers and program staff. The additional budget information and supplemental instructions are deemed necessary to determine the relevance, reasonableness, and allow ability of budget items for which of the project consistent with recommendations accepted by the Department.

9. Decision to Provide any Payment of Gift to Respondents

There is no provision to make payment or gift to any respondents.

10. Assurances of Confidentiality

There is no assurance of confidentiality provided to the respondents concerning this collection.

11. Justification for Questions of a Sensitive Nature

There are no questions of a sensitive nature in this collection of information.

12. Respondent Cost

Respondent costs result only from time spent in the preparation and submission of an application. Estimated annual costs for respondents are as follows: a) Respondent costs include: 40 hours C \$20/hr = \$800.00

Total cost to all: 1,000 applicants @ \$800 = \$800,000.

Costs are not expected to vary in activity, size or complexity. The range of estimated hour burden is 30-50 hours. The range of estimated hour burden is 30-50 hours.

b) This request covers one form that may be used across several discretionary grant programs. c) Estimated costs have been included under (a). No additional costs, contractual or others are planned for this competition.

The annual reporting and recordkeeping hour burden are as follows:

a. Individuals or household 400 hrs; b. Businesses or other for profit 3,600 hrs; c. Not-for-profit institutions 20,000 hrs; and d. State Local or Tribal 16,000 hrs.

The OMB information requested, on number of hours (burden), is impossible to compile on a CFDA by CFDA basis. We cannot distribute the hours by CFDA category with any reasonable accuracy. All the money for eight of the programs comes out of one pot. We may run a competition under one CFDA one year in five. In some cases, we may not run any. Others we

may run every year. However, we change the distribution of funds from year to year to respond to needs in the field. This means we change which competition areas (i.e., CFDA) we may run in any given year. We can't project out any more than a year in some cases. As we shift money around, we change the impact on burden. We don't know how our money will be distributed in two years, so we can't estimate burden by CFDA. We can estimate with reasonable accuracy across the CFDA's as we know how much money we will compete and can translate that into number of applications which we can convert into burden. We cannot do this CFDA by CFDA with reasonable accuracy. It is that simple for us.

A good example of the problem in calculating these figures is as follows: 84.129 and 84.263 are funded out of the same pot of money (as are several other grant areas). We have no specific plans to fund anything in 84.263, but that could easily change for a given year. If we do fund grants in 84.263, we would fund fewer in 84.129, so the info on number of applications (and therefore burden) would change accordingly. We simply do not know at this point. Also, we get a VERY occasional application from an individual. we never know what category we might get on in. How do we report the number of grants from individual? For any given category, we are unlikely to get any, but we will probably get one or two somewhere along the line.

I recommend providing an aggregate figure across all CFDA's. The figures we can provide will

be reasonably accurate. Breaking them down by CFDA will be highly inaccurate.

13. Total Annual Burden Estimate to Respondents

There are not any costs to respondents other than the time to prepare an application and submit it as estimated in 12 above.

14. Estimates of Annualized Cost to the Federal Government

All activities related to collection and processing of the data are standard duties of current RSA staff; no new hiring is proposed for these purposes and no additional expenditures are anticipated. Cost to the Federal Government:

The total cost to the Federal Government is estimated at \$16,600.

The specific costs are as follows:

- It is estimated that about 2,000 application forms will be printed and mailed at a cost to the Federal government of about \$2,800.
- It is estimated that approximately 120 person hours are involved in the receipt and processing of grant applications at an average cost of \$15.00 an hour for a total cost of \$1800; costs associated with staff analysis are estimated Q 400 hours Q \$30/hr for a total cost of \$12,000.

15. Program Changes of Adjustments

No changes/adjustments

16. Publication of Results

There are no plans for the publication of this data for statistical use.

17. Seeking-Approval to Not Display OMB Expiration Date

The expiration date will continue to be shown on the front of the collection instrument.

18. Exception to the Certification Statement

There are not any exceptions noted in the certification statement.