OMB SUPPORTING STATEMENT

for the

Annual Performance Reporting Forms for NIDRR Grantees

U. S. Department of Education
Office of Special Education and Rehabilitative Services (OSERS)
National Institute on Disability and Rehabilitation Research (NIDRR)

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A.   Justification

1.   Importance of the Information

The National Institute on Disability and Rehabilitation Research (NIDRR) of the Department of Education (ED) requests clearance of revised annual performance reporting (APR) forms to be completed by all NIDRR grantees. The forms included in this package are revised versions of those used by grantees in the following 9 programs to submit their Annual and Final Performance Reports for Fiscal Year (FY) 2005, under OMB collection number 0642:

- Rehabilitation Research Training Centers (RRTCs)
- Rehabilitation Engineering Research Centers (RERCs)
- Field Initiated Research Projects (FIPs)
- Advanced Rehabilitation Research Training Projects (ARRTs)
- Model Systems (including spinal cord injury, traumatic brain injury, and burn centers)
- Disability and Rehabilitation Research Projects (DRRPs)
- Knowledge Translation (KT) Projects
- Disability and Business Technical Assistance Centers (DBTACS)

OMB's one-year provisional approval of the forms used in FY 2005 expires May 31, 2007.

Reporting forms for all 9 programs are web-based; that is, all grantees will complete their annual reports via the Internet. Data collected through these forms will be used to:

(a) facilitate program planning and management;

(b) respond to Education Department General Administrative Regulations (EDGAR) requirements; and

(c) respond to the reporting requirements of the Government Performance and Results Act (GPRA) of 1993 (P.L. 103-62) as well as to the Office of Management and Budget's (OMB) Program Assessment Rating Tool (PART) evaluation requirements.

Statutory Requirements for This Data Collection

NIDRR's web-based reporting system addresses specific EDGAR requirements that must be met by applicants and grantees. EDGAR requirements that apply to NIDRR Grant programs include 34 CFR, Parts 75, 77, 79-82, 85-86 and 97. Specifically, 34 CFR 75.590 requires grantees to submit an annual performance report or, for the last year of a project, a final report that evaluates at least annually: (a) the grantee's progress in achieving the objectives in its approved application, (b) the effectiveness of the project in meeting the purposes of the program, and (c) the effect of the project on the participants served.

Additionally, GPRA requires all federal agencies to implement performance measurement systems that include: (1) a five-year strategic plan, (2) an annual performance

plan, and (3) an annual performance report. Currently, NIDRR has met these requirements and has established performance indicators to meet the reporting requirements. The NIDRR APR System currently includes reporting systems for all 10 of NIDRR's grant programs.

NIDRR's GPRA plan, as part of ED's performance reporting requirements, must collect information to meet the following mandates: (a) implementation of a comprehensive plan that includes goals and objectives for the program; (b) measurement of the program's progress in meeting its objectives; and (c) submission of an annual report on program performance, including plans for program improvement, as appropriate. The data collection system addresses nearly all of the agency's GPRA indicators, either directly or by providing information for the agency's Annual Portfolio Assessment Expert Review (APAER) process.[1]

These indicators include:[2]

Indicator 1.1: The percentage of National Institute on Disability and Rehabilitation Research (NIDRR) grantees that are conducting at least one multisite, collaborative controlled trial.

Indicator 1.2: The percentage of National Institute on Disability and Rehabilitation Research (NIDRR)-supported fellows, post-doctoral trainees, and doctoral students who publish results of NIDRR-sponsored research in refereed journals.

Indicator 2.1: The number of accomplishments (e.g., new or improved tools, methods, discoveries, standards, interventions, programs, or devices) developed or tested with NIDRR funding that have been judged by expert panels to be of high quality and to advance the field.

Indicator 3.1: The number of new or improved National Institute on Disability and Rehabilitation Research (NIDRR-funded assistive and universally designed technologies, products, and devices transferred to industry for potential commercialization.

Indicator 3.2: The average number of publications per award based on National Institute on Disability and Rehabilitation Research (NIDRR)-funded research and development activities in refereed journals.

Form Questions

In order to provide accurate and comprehensive documentation of the activities, outputs, and outcomes of NIDRR grantees, the APR forms will collect information on several areas (see **Table 1**). Each form contains data elements keyed specifically to goals, objectives, and reporting requirements of the respective programs. Appendix B contains a paper version of all the data elements for which NIDRR is requesting clearance. The individual program forms will be compiled from the master list of data elements.

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[1] Several additional measures (e.g., the percentage of grant applications that receive an average peer review score of 85 or higher) are based on grant review documentation.

[2] SOURCE: National Institute on Disability and Rehabilitation Research, May 26, 2006.

Major Changes in the Reporting Form

In order to better meet its information needs, and to minimize reporting burden, NIDRR has made a number of changes to the reporting form and web-based system used for FY 2005 reporting. Most importantly, the form has been redesigned so that information provided by grantees each year is automatically carried forward to the next. Under this design, grantees need only review and, if necessary, edit their previous year's entries in order to complete subsequent annual reports. This change will be effective immediately, with all relevant information from FY 2005 reports carried forward to the new system in preparation for FY 2006 reporting.

The reporting form itself has also been streamlined, following a comprehensive review by NIDRR officials responsible for program management. Requirements for outcomes planning have been greatly simplified, and the level of detail requested on research and development/demonstration projects has been reduced. In the publications section, grantees need no longer report on materials that are not published by external sources. Finally, separate descriptions of accomplishments have been eliminated; instead, grantees will simply select their most important accomplishments from among the outputs they report.

Additional changes to the web-based system include:

- *Preloading data from grant applications*, including contact and budget information.

- *Adding system-generated summary tables* to facilitate grantee and NIDRR staff review of information submitted.

- *Carrying information forward from one section of the form to the next;* for example, information on outcome-oriented goals will be carried forward for convenient linkage with projects/activities and publications.

Analysis

The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of NIDRR staff, ED staff, and Congress under provisions of EDGAR and GPRA. NIDRR will prepare these reports according to regulatory requirements. NIDRR will prepare other data tabulations on an as-needed basis to meet specific information needs. In addition, the APR system will support NIDRR's APAER activities.

2.   Purposes and Uses of the Data

NIDRR and ED will use the information gathered annually from these data collection efforts to comply with EDGAR, to provide Congress with the information mandated in GPRA, enable grantees to complete the 524B reporting requirements, and to provide OMB information required for assessment of performance on GPRA indicators and the PART evaluation. Data collected from the 10 grant programs will provide a national description of the research activities of approximately 270 NIDRR grantees.

As noted above, the APR system is the source of data for NIDRR's annual output-based performance measures. It also supports the APAER system, the mechanism that the agency uses to assess its progress on agency-wide long-term output and outcome performance measures. The APAER system obtains information from the APR data warehouse for aggregation into portfolio areas corresponding to the NIDRR's long-range plan. NIDRR then establishes expert review panels in those areas. Panel members review the information in the portfolio and assess the aggregate performance of grantees on a number of dimensions, including scientific rigor, productivity, quality, consumer relevance, and outcomes. The panel then responds to questions regarding the agency's long-term performance in the portfolio area, thus permitting NIDRR to provide OMB with information required to assess the agency's performance over time.

Further, NIDRR, which has requested clearance of these forms, is charged in various ways with providing technical assistance and resources regarding disability research and will be better able to carry out that mission with the data collected through the APR reporting system. Research centers can also use their own annual performance data as they discuss, plan, generate support for, and implement research, development, and knowledge translation/dissemination programs and services for individuals with disabilities. These data will provide information that policy makers can use in better understanding the barriers, opportunities, and outcomes involved in improving services for individuals with disabilities.

3. Information Technology

This information collection request is for a web-based reporting system; grantees enter their data electronically through a secure Internet website. This information collection system covers 9 grant programs funded or administered by NIDRR, and each grantee submits its information using a reporting form that is unique to the program mechanism under which it is funded. The 9 forms meet the reporting requirements for the following programs:

1. Rehabilitation Research Training Centers (RRTC)
2. Rehabilitation Engineering Research Centers (RERC)
3. Field Initiated Research Projects (FIP)
4. Advanced Rehabilitation Research Training Projects (ARRT)
5. Model Systems – (includes spinal cord injury, traumatic brain injury, burn centers)
6. Disability and Rehabilitation Research Projects (DRRP)
7. Knowledge Translation (KT) Projects
8. Disability and Business Technical Assistance Centers (DBTAC)
9. Small Business Innovation Research Projects (SBIR)

The web-based reporting forms are developed and maintained using Macromedia's Cold Fusion Application Server software (version 5.0) and SQL Server 2000. Microsoft's Internet Information Server is used as the primary web server software. Collected information is stored in a relational database. Access to the data in this database is provided using a combination of

Table 1 – Data Elements Addressed by Each NIDRR Form

DATA ELEMENTS	ARRT	KT	DBTAC	DRRP	FIP	MS	RERC	RRTC	SBIR
Contact and Identifying Information									
General information	X	X	X	X	X	X	X	X	X
Award abstract	X	X	X	X	X	X	X	X	X
Impairment group		X		X	X	X	X	X	X
Budget Information									
Projected budget summary	X	X	X	X	X	X	X	X	X
NIDRR funds expended	X	X	X	X	X	X	X	X	X
NIDRR funds received	X	X	X	X	X	X	X	X	X
Rationale—carryover from previous period	X	X	X	X	X	X	X	X	X
Rationale—carryover to next period	X	X	X	X	X	X	X	X	X
Additional funds	X	X	X	X	X	X	X	X	
Support from host institution	X	X	X	X	X	X	X	X	
Funding overview (system-generated)	X	X	X	X	X	X	X	X	X[1]
Indirect costs	X	X	X	X	X	X	X	X	X
Human Resources									
Paid staff	X	X	X	X	X	X	X	X	X
Formal financial subcontracts	X	X	X	X	X	X	X	X	X
Partnerships and collaborations	X	X	X	X	X	X	X	X	X
Consumer involvement	X	X	X	X		X	X	X	X
Planning for Outcomes and Significant Outputs									
Short title of goal	X	X	X	X	X	X	X	X	X
Outcome-oriented goal	X	X	X	X	X	X	X	X	X
Type of accomplishment	X	X	X	X	X	X	X	X	X
NIDRR outcome arena	X	X	X	X	X	X	X	X	X
Primary target population(s)	X	X	X	X	X	X	X	X	X
Relevance to proposed priority	X	X	X	X	X	X	X	X	X
Projects and Activities									
Research projects	X	X	X	X	X	X	X	X	X
Development projects	X	X	X	X	X	X	X	X	X
Dissemination and knowledge translation projects		X	X	X	X	X	X	X	X
Capacity-building activities	X			X	X	X	X	X	
Training projects and activities	X	X	X	X	X	X	X	X	X
Technical assistance activities		X	X	X	X	X	X	X	X
Additional accomplishments in capacity-building, training, and technical assistance		X	X	X	X	X	X	X	X

DATA ELEMENTS	ARRT	KT	DBTAC	DRRP	FIP	MS	RERC	RRTC	SBIR
Award-Specific Sections									
Model systems clinical care						X			
Knowledge translation awards		X							
Disability Business Technical Assistance Centers			X						
Performance: Outputs and Associated Accomplishments									
Type 1 Outputs: Publications	X			X	X	X	X	X	X
Type 2 Outputs: Tools, Measures. and Intervention Procotols	X	X	X	X	X	X	X	X	X
Type 3 Outputs: Technology Products and Devices	X	X	X	X	X	X	X	X	X
Type 4 Outputs: Informational Products	X	X	X	X	X	X	X	X	X
Other accomplishments and contributions	X	X	X	X	X	X	X	X	X
Overall status of outcome-oriented goals	X	X	X	X	X	X	X	X	X

[1] Funding overview table will not include support from host institution.

Microsoft's Open Database Connectivity (ODBC) technology and database query functionality provided by Cold Fusion Markup Language.

A primary advantage of this type of dynamic database is the immediate access NIDRR staff have to the information grantees submit. Not only are NIDRR staff able to identify, almost instantly, which grantees have submitted their completed forms (via the Internet), they can also generate reports, even on partial data, as requested by Congress or ED. The system can be programmed to send electronic mail messages to all grantee project directors prior to the due date of the annual reports. Electronic messages are also sent to grantees that do not submit their reports on time; federal project officers are thus able to spend less time telephoning grantees to ensure that annual reporting requirements are met.

Use of a web-based data collection form minimizes grantee burden in submitting an annual report. Where appropriate, the reporting form automatically generates totals, saving grantees time and reducing the chance of arithmetical errors degrading the accuracy of program data. Another burden-reducing feature of the web system permits grantees to enter information on an ongoing basis during the reporting period. During year one of a grant, a grantee will enter all relevant research project information; in subsequent grant years, the system will provide grantees with previously entered data, allowing them to make only the necessary edits rather than re-enter data from year to year, as they have in the past using paper forms. Finally, NIDRR's contractor, RTI International, will provide any necessary technical assistance to grantees, expediting the process.

RTI has a proven track record of developing web-based reporting systems that are accessible to persons with disabilities. The reporting forms contained in this clearance package will meet or exceed requirements for accessibility contained in Section 508 of the Rehabilitation Act of 1973 and all other relevant statutes and regulations. RTI has worked closely with the ED Assistive Technology Team to maximize the accessibility of the reporting systems it has created for NIDRR and other ED agencies since 1998. As one example of steps taken to ensure accessibility, the instruction manual that will be included in the reporting system contains a customized guide for persons using screen-reading technologies to complete the form. To the extent possible, RTI will make any requested changes necessary to ensure that the web-based reporting forms reflect the state-of-the-art in Internet accessibility practices.

4.   Efforts to Identify Duplication

The ten forms contained in this clearance package do not duplicate items from any other NIDRR data collection efforts.

5.   Methods Used to Minimize Burden on Small Entities

This information collection will involve the small businesses that have received grants under the SBIR program. The other NIDRR programs covered by this data collection request are not small businesses or small entities. The number of businesses awarded SBIR grants by NIDRR varies each year; in FY 2005 a total of 13 small businesses had Phase II grants and were required to report using the APR tailored for that program.

The following methods will be used to minimize the reporting burden placed on SBIR grantees:

- The SBIR reporting form will contain fewer data elements than the reporting forms of most other programs.
- Recipients of Phase II grants will be able to use data entered in previous years' reporting forms as a starting point for creating each subsequent annual report. There will be no need to reenter data that are unchanged, such as project abstracts, key staff information, general contact information, or narrative of goals and objectives.
- Where appropriate, the web-based reporting system will automatically generate totals, saving the grantees the time necessary to make those computations.
- Spell checking software will be installed to help the grantee conduct spell checks of narrative sections of their reports.
- Reporting forms can be opened and closed at any time, allowing the grantees to complete their reports at their convenience.

Any remaining burden on small businesses is unavoidable, if data are to be collected from the SBIR grantees in accordance with GPRA and EDGAR reporting requirements.

6. Consequences of Not Collecting the Information

The proposed data collection activities involve an annual required data collection from NIDRR grantees. If the information is not collected, data on key aspects of programs and services for individuals with disabilities will not be available; consequently, NIDRR would be unable to meet statutory and regulatory requirements for collection and reporting of data on grantees' activities and outcomes.

7. Special Circumstances

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5, and requires no special circumstances.

8. Consultation Outside the Agency

NIDRR has revised its reporting forms based on further analysis of the agency's information needs, its experience in collecting and analyzing data for FY 2005, and OMB's comments on the FY 2005 forms. Input on revisions came not only from NIDRR's senior staff but also grantees themselves. Grantees submitted comments both to RTI International, the contractor responsible for implementation of the system, and the National Center for the Dissemination of Disability Research, which was responsible for dissemination of information on the FY 2005 APR to grantees.

RTI provided NIDRR with a summary of grantee comments from both sources, along with an analysis of technical assistance requests, in an October 2006 report. RTI also provided its own recommendations for changes in the form, based on analysis of FY 2005 data.

Additional input concerning the form will be provided by 9 grantees who will participate in a field test of the forms, using the web-based data collection system.

9.   Payments or Gifts to Respondents

No payments or gifts are to be provided to respondents.

10.   Assurances of Confidentiality

Two levels of system security will be established to assure confidentiality of data obtained via the Internet. In order to prevent the general public from accessing the system, grantees' Federal award numbers (PR numbers) will be pre-loaded into the web-based reporting system. Secondly, unique passwords will be sent to each grantee following OMB clearance. Grantees must enter both their Federal award number (PR number) and unique password to enter the web site and input their data. These two security measures will also ensure that individual grantees cannot obtain access to any other grantees' reporting form via the Internet. Additionally, only NIDRR-identified Federal staff will be given access to the system's database to view and generate reports. RTI maintains a firewall between all networks and the Internet; the firewall is configured at an appropriate level to protect the network. Network security staff monitors the firewall logs on a routine basis, and intrusion attempts are investigated as appropriate.

11.   Sensitive Questions

The questions included in the form are not considered to be sensitive.

12.   Estimate of Response Burden

NIDRR has reviewed the APR form carefully to ensure that all requested information is necessary and to reduce burden to the extent possible. As indicated above (see "Major Changes in Reporting Form"), the length of the form (particularly the "Planning for Outcomes" section) has been reduced considerably. The web-based system will be redesigned so that, whenever possible, information entered by grantees will be carried forward from one year to the next, with only verification and any necessary updating of that information required. The design of the system will also provide for preloading or uploading of information from other sources (e.g., budget data from grant applications and abstracts submitted to the National Rehabilitation Information Center). Given these improvements, as well as grantees' increasing familiarity with the system and reporting requirements, we have estimated the average amount of time required to complete the reporting form at 50 hours in a grantee's first year of award. In subsequent years, grantees will be asked to update that information, which we anticipate will require approximately 20 hours for NIDRR's major programs (i.e. RRTC, RERC, MS, DRRP) and 8 hours for the other program mechanisms.

The FY 2005 universe of NIDRR grantees required to report using the current web-based annual project performance reporting system totaled 271, distributed across program mechanisms as follows:

RRTC: 32 grants
RERC: 22 grants
FIP: 102 grants
ARRT: 16 grants
MS: 37 grants
DRRP: 36 grants
KT Projects: 4 grants
DBTAC: 10 grants
SBIR: 12 grants

While the number of grantees will vary from year to year, all grantees will be required to submit an annual performance report. Based on an average of 50 hours to complete the reporting form in a grantee's first year of award and a cost to respondents of $30 per hour, the total estimated cost per respondent in the first year of award is approximately $1,500, and the total cost for all 271 grantees is approximately $406,500. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the form.

In subsequent years, the estimated response burden is approximately 20 hours for NIDRR's major programs (i.e. RRTC, RERC, MS, DRRP) and 8 hours for the other program mechanisms. At a cost to respondents of $30 per hour, the total estimated cost per respondent in subsequent years is approximately $600 for the major programs and $240 for the other program mechanisms. The total cost for all 127 grantees in the major programs is approximately $76,200, and the total cost for all 144 grantees in the other program mechanisms is approximately $34,560.

The estimated cost to respondents of $30 per hour represents the average, fully-loaded wage rate, i.e., includes pre-tax cash wages, fringe benefits and overhead support, for four different classes of labor ranging from clerical to managerial labor. The average wage rate accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional, and managerial) are expected to expend in preparing the report.

| | First year of award | Subsequent years | |
		Major programs	Other programs
Number of direct respondents	271	127	144
Average hours per response	50	20	8
Total burden hours	13,550	2,540	1,152
Cost per hour	$30	$30	$30
Total cost	**$406,500**	**$76,200**	**$34,560**

13.   Estimate of Cost Burden of Collecting Information

This is an annual reporting form. There are no capital costs nor are any equipment purchases necessary.

14.   Estimate of Annualized Cost to the Federal Government

RTI International, of Research Triangle Park, NC, will continue to operate the web-based reporting system under contract to NIDRR. The cost of revising the system used in FY 2005, as required by changes in the APR forms and expanded functionality, is estimated at $67,000. The annualized cost of operating the system over the first year, including preparation of reports, provision of technical assistance to grantees and NIDRR staff, and revisions based on the field test and OMB guidance, is estimated be approximately $231,000.

15.   Why Has the Burden Changed

These 9 performance reports are all processed within this one system. As grantees log into it with their customized passwords, they will receive only those questions that are appropriate for their specific program. By consolidating these programs into one system, the public has been saved unnecessary burden since results have been streamlined to only require those items from each program that are mandated.

16.   Display Expiration Date for OMB Approval

NIDRR will display the expiration date for OMB approval of the information collection.

17.   Exceptions to Certification Statement

There are no exceptions to the certification statement.

Appendix A – OMB Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is XXX-XXXX, with an expiration date of XX/XX/XXXX. The web-based system is designed so that, whenever possible, information entered by grantees will be carried forward from one year to the next, with only verification and any necessary updating of that information required. The time required to complete this form is estimated to average 50 hours per response in a grantee's first year of award, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. In subsequent years, grantees will be asked to update that information, which we anticipate will require approximately 20 hours for NIDRR's major programs (i.e. RRTC, RERC, MS, DRRP) and 8 hours for the other program mechanisms. If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-465 1. If you have comments or concerns regarding the status of your individual submission of this form, write directly to: Office of the Chief Financial Officer, U.S. Department of Education, 600 Independence Avenue, S.W., Washington, D.C. 20202-4248

Appendix B - Proposal Annual Reporting Form – All Questions