

SUPPORTING STATEMENT

A. Justification:

1. Legal Requirement:

Public Law 108-364, Section 5, of the Assistive Technology Act of 1998, as amended (the Act) requires that the secretary make a grant to an entity in each state to support protection and advocacy services through the systems established to provide protection and advocacy services under the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act), for the purposes of assisting in the acquisition, utilization, or maintenance of assistive technology devices or assistive technology services for individuals with disabilities. Effective as of February 2, 2004, the administration of the Protection and Advocacy for Assistive Technology (PAAT) program was transferred from the National Institute on Disability and Rehabilitation Research to the Rehabilitation Services Administration (RSA). The attached documents comprise of the grantee's written request for grant funds and assurances that the PAAT program can carry out its statutorily prescribed purposes and functions.

This preprint is based on the following:

- (1) Title I, Section 5 of the Act; and
- (2) General requirements for all written requests for funding, pursuant to the Education Department General Administrative Regulations (34 CFR Part 76).

2. Purpose of the Information:

While Section 5 of the Act does not contain any provisions specifying the manner by which an application for PAAT funding must be made, an approved written request is a condition for receipt of federal funds under EDGAR, Part 76. RSA has developed the materials listed below to serve as the request for funds under the PAAT program. The materials are similar to those used by the Protection and Advocacy (P&A) systems in each state to request funding under other P&A programs administered by RSA, including those for the Protection and Advocacy of Individual Rights (PAIR) program and the Client Assistance Program (CAP). In addition, the content of the Assurances is based directly on the provisions of Section 5 of the Act.

The PAAT application package consists of the following documents:

- (1) A cover letter from the commissioner of RSA to the executive director of the P&A system in each state;
- (2) The PAAT assurances;
- (3) Certifications of Lobbying, Debarment and Drug-Free Workplace; and
- (4) A sample letter from the executive director of the P&A in

each state to the commissioner to accompany the completed package.

One minor change was made to the content of this material. The 2004 amendments to the Assistive Technology Act added a definition for “American Indian Consortium.” As in the authorizing legislation for the other major P&A programs, including the PAIR program, Section 5(b)(4) now creates a set-aside to fund the P&A system designated by the American Indian Consortium. This reservation is equal to the allotments for territories (a minimum of \$30,000). Based upon this change, there are now 57 PAAT grantees required to submit these assurances rather than the previous number of 56.

As with the currently approved collection, RSA will require each P&A to submit the assurances annually. These materials will serve as a request for funding until such time as the governor in accordance with the provisions of the DD Act, may redesignate the P&A. This procedure will reduce the reporting burden on the P&As and simplify the process by which grant awards are made by RSA.

3. **Burden:**

This is a preprinted legal document, which requires an authoritative signature and minimal reporting burden. P&As do not submit responses electronically because an authoritative signature is required. The possibility of submitting responses electronically, with just a hard copy signature page, was considered. However, because the reporting burden is so minimal and the form is so short, it did not justify allowing the submission to be done in two stages.

4. **Duplication:**

This document collects unique information that is not collected under any other instrument. The written request is required by federal regulation and is not obtained through any other data source.

5. **Small entities:**

The collection of this information does not involve small businesses or other small entities.

6. **Consequences of less frequent collection:**

The provisions of EDGAR require grantees to submit a written application or request for formula grant funds, such as those available under the PAAT program, though there is no requirement regarding the frequency of the submission. As described above in answer to No. 2, the assurances and other materials will be submitted only once prior to the budget period beginning October 1, 2007. These materials will serve as the request for FY 2008 funds and all subsequent fiscal years, until such time as the P&A in the state may be redesignated. If the P&A fails to complete the application as required, the P&A will not

be eligible for federal funds for the PAAT program. This method has been established as the required procedure.

7. **Special circumstances:**

There are no special circumstances that would require this information to be collected in a different manner.

8. **Solicitation of public comments:**

The assurances are taken directly from federal law and regulations. We will seek public comments through *Federal Register* notices.

9. **Payment to respondents:**

No payment or gift has been provided to respondents.

10. **Confidentiality:**

The written request does not contain specific or personal information.

11. **Sensitive questions:**

The written request does not contain any questions of a sensitive nature.

12. **Estimates of hour burden to respondents:**

a.	Number of respondents	- 57
b.	Frequency of response	- 1
c.	Total annual responses (axb)	- 57
d.	Hours per response	- .16*
e.	Total burden hours (cxd)	- 9
f.	State hourly rate of salary	- \$20
g.	Total cost (exf)	- \$180.00

* The burden hours associated with the written Request for a PAAT program grant is estimated at 10 minutes, or .16 hours, per P&A in each state or territory. The estimated hour burden per P&A is not expected to vary significantly. Estimated burden hours are founded on judgments based on submittals of similar written requests for P&A grants administered by RSA, including the PAIR program and CAP.

13. **Additional cost burden to respondents:**

There is no additional cost burden to the &As in each state and territory when submitting

a written Request for a PAAT grant.

14. Cost burden to Federal government:

a.	Review of each written request	- .16 hours
b.	Number of written requests to review	- 57
c.	Total time to review written requests	- *9 hours
d.	Federal hourly rate of salary	- \$25
e.	Total cost (cxd)	- \$225

* The estimated burden hours to the federal government does not include time needed for negotiations when a written request is not approvable. Given the perfunctory nature of this written request, it would be unusual for a request to not be approvable.

15. Program changes:

There is a negligible change to the burden hours or costs established for this collection (1820-0658) based upon the addition of one respondent: American Indian Consortium (see answer 2 above).

16. Information to be published:

The information collected will not be published for statistical use.

17. Approval not to display expiration date:

This document is not seeking OMB approval not to display the expiration date.

18. Exceptions to the certification statement:

This document meets each of the criteria outlined in the "Certification for Paperwork Reduction Act Submissions."

B. Collection of information employing statistical methods:

The written request for a PAAT grant is a legal document and does not require the use of any statistical methods in obtaining information.