

## SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

### 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 regulations mandating or authorizing the collection of information.**

Section 13 of the Rehabilitation Act, as amended (the Act) requires the Commissioner of the Rehabilitation Services Administration (RSA) to submit an annual report to the Congress on the activities carried out under this Act, including statistical data reflecting services and activities provided individuals during the preceding fiscal year. Section 14(a) of the Act further requires an evaluation of the impact of programs under the Act, including their general effectiveness in relation to their cost.

Section 302(b)(2)(C) of the Rehabilitation Act, as amended (the Act), requires academic institutions (i.e. grantees) which administer the RSA Long-Term Training grants to be responsible for keeping track of the employment location of former scholars supported under their training grants. Program regulations at 34 CFR 386.34 require each grantee to establish and maintain a tracking system on current and former RSA scholars regarding the payback requirement and to report to the Secretary on these matters. The program regulations at 34 CFR 33-35 and 40-43 also spell out the payback provisions and the RSA scholars' requirements to comply with them. (See Attachment A: Selected section of Section 302 of Title III of the Act, and program regulations at 34 CFR 386.33-35 and 40-43).

In addition, the GPRA requires each program to assess grantees compliance with program requirements. The RSA "Grantee Reporting Form" will help RSA to assess the impact of mandated training programs and to monitor and evaluate progress toward meeting the goal as stated in Section 302 of Title III of the Act: "...increasing the numbers of qualified personnel trained in providing vocational, medical, social, and psychological rehabilitation services, and other services provided under this Act, to individuals with disabilities ...."

The Grantee Reporting Form is a reasonable approach for RSA training grantees to use to carry out their tracking and reporting responsibilities and will assist the Commissioner in preparing the Annual Report to Congress of performance data regarding the impact of training programs under the Act, including their effectiveness in assuring that skilled personnel are available to provide rehabilitation services to individuals with disabilities.

The Grantee Reporting Form is a comprehensive and concise summary of the status of "current" and "exited" RSA scholars who are/were the recipients of training funds under the Act and will provide valuable performance data relevant to the rehabilitation fields and degrees pursued by RSA scholars, as well as the funds owed and the rehabilitation work completed by them.

#### **2. Indicate how, by who, 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.**

This is not a new information collection. This information collection form was approved and extended with minor modifications by OMB until July 31, 2007.

RSA currently uses the Grantee Reporting Form to assess grantees' compliance with program requirements and to report to Congress performance and progress in meeting the purpose for training programs as mandated in Title III of the Act to "ensure that skilled personnel are available to provide rehabilitation services to individuals with disabilities through vocational, medical, social, and psychological rehabilitation programs ...." The Reporting Form will provide specific information in this regard, including the number of RSA scholars entering the rehabilitation workforce, the rehabilitation fields being entered, and the types of employment (e.g. State agency, nonprofit service provider or practice group).

As stated (see Item 1 above), RSA training grant recipients are required to "track" students receiving "scholarships" under the RSA training grants, maintaining information about cumulative support granted to RSA scholars, scholar-debt in years, program completion data for each scholar, dates each scholar's work begins and is completed to meet his/her payback agreement, current home address and place of employment of individual scholars.

Submission of the Grantee Reporting Form is required of each training grantee annually. As stated above, the information on this form has enabled RSA to address the Congressional mandate to secure data based upon program compliance requirements and the annual evaluation of performance indicators. The information collected by the Grantee Reporting Form has enabled RSA to assess whether grantees are implementing their grants effectively and whether technical assistance is needed in order to improve program management of the grant.

### **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.**

Currently, the information requested on the Grantee Reporting Form is reported annually by RSA training program grantees via RSA's integrated web-based system. The RSA On-Line Grantee Reporting System allows grantee institutions (generally universities or colleges) to electronically "track" and submit reports on-line regarding the "payback" status of scholarship recipients (i.e. RSA Scholars) who are either currently enrolled, have graduated, or left the program. To date, the use of the on-line system has not posed a hardship for any of our grantees and we do not anticipate that this will be a problem in the future.

**Note:** Migration of the system to the RSA MIS is currently underway.

### **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.**

This Grantee Reporting Form is not duplicated elsewhere. No similar information is available from any other sources.

**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.**

Respondents are state and public or nonprofit agencies and organizations, including institutions of higher education. For small colleges and/or universities, no adverse impact is apparent. The form takes minimal time to complete. Our experience has been that many colleges or universities, especially small ones, like the form to help them organize their scholarships and to serve as an internal tracking system for themselves.

Most grantees have already collected this information for their own internal use, so it will likely take only minimal time to transfer the data. As mentioned before, many universities/colleges use this as an internal tracking system for their own purposes, so they are collecting the information anyway.

**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.**

Legislative mandate requires that data contained in the Grantee Reporting Form be collected on an annual basis. To collect data less frequently would fail to fulfill the requirements of the supporting legislation. Therefore, RSA training grantees maintain and report required information annually to the RSA. We believe the Grantee Reporting Form will continue to assist grantees in their collection and reporting of this information in a concise, consistent, and easily useable format.

The Grantee Reporting Form has been an essential tool in the collection and continued quality of the payback status records kept by the grantees.

Federal administration functions involving the monitoring, provision of technical assistance, budget development, and the measurement and reporting (to Congress) of the performance standards related to program purpose and achievement will be seriously impeded without the annual electronic submission of the data provided by training grantees to RSA on the Grantee Reporting Form.

**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 annually.**

There are no anticipated circumstances requiring respondents to report information to the agency more often than annually.

**-requiring respondents to prepare a written response to collection of information in fewer than 30 days after receipt of it;**

There are no anticipated circumstances for requiring respondents to prepare a written response to the Grant Reporting Form in fewer than 30 days after receipt of the Form.

**-requiring respondents to submit more than an original and two copies of any document;**

There are no anticipated circumstances that would require respondents to submit more than an original and two copies of the Grantee Reporting Form. Currently, grantees do not submit hard copies of the form; reports are submitted electronically via a web-based on-line reporting system.

**-requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Yes, there are circumstances for requiring respondents to retain such records as named above for more than three years. However, RSA training grantees are required by statute to "track," maintain and report information on "current" RSA scholars until all scholars have completed their work obligations. Thus, the Grantee Reporting Form will be submitted for a number of years beyond which the project is supported with Federal funds. (Failure to report scholars may result in a cost disallowance found through an audit and may affect their ability to receive future Federal grants.)

**-in connection with a statistical survey, that it is not designed to produce valid and reliable results that can be generalized to the universe of study;**

This information collection is *not* a statistical survey, and it is not designed to produce valid and reliable results that 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;**

The information collection does not require the use of a statistical data classification that has not been reviewed and approved by OMB.

**-that includes 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;**

This information collection does not include 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.

**-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;**

Information collection does not require respondents to submit proprietary trade secrets or other confidential information.

**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 13208(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.**

We will publish the appropriate 60 and 30 day notices for public comment.

RSA uses its annual project directors' meeting as an opportunity to gain input from current grantees regarding the Grantee Reporting Form.

**9. Explain any decision to provide any payment or gift to respondents, other than re-numeration of contractors or grantees.**

All respondents are grantees of RSA, and this collection is an accounting of one aspect of their program administration. There are no payments or gifts to respondents specific to this data collection.

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

The data is not confidential and no assurances of confidentiality are provided to the respondents.

**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. This justification should not 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.**

The information collection does not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

**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-I.**

**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 be included in Item 14.**

Average Number of Respondents (RSA training grantees) reporting annually: 350

Average Hours per Respondent for Annual Submission of the Grantee Reporting Form: 60 - 75 minutes

Total Hours Represented: 350 - 400 hours

**Note:** The "hour burden" of respondents' (grantees) data maintenance and reporting may vary because of differences in their respective numbers of RSA scholars

Estimated Annualized Costs: \$17,500 to \$20,000 (350-400 hours x average hourly wage rate of \$50).

**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, 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.**

There are no start-up costs.

**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.**

It is estimated that approximately 120 hours of RSA staff time are required. At an average hourly wage rate of \$45, the estimated annualized cost to the Federal government is \$5,400.

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

There are no program changes or adjustments reflected in the proposed Grantee Reporting Form.

**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.**

RSA will utilize this information in preparing its Annual Report to Congress on the activities carried out under the Rehabilitation Act (see Item #1 above). The aggregate number of rehabilitation personnel being trained and entering rehabilitation fields will be tabulated through use of the Grantee Training Form, and these annual totals will be available for dissemination (along with their analysis) in the Annual Report to Congress.

**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 to not display the expiration date is not being sought.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement identified in Item 19: "Certification for Paperwork Reduction Act Submissions," OMB Form 83-I.