Supporting Statement for Paperwork Reduction Act Submissions

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked, "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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.

Sec. 752(i)(2)(A) of the Rehabilitation Act of 1973, as amended, (attachment A) and the corresponding regulations in 34 CFR 367.11(d) require each grantee under the Independent Living Services for Older Individuals who are Blind (IL-OIB) program to submit an annual report to the Commissioner of the Rehabilitation Services Administration (RSA) on essential demographic, service and outcome information.

The revised ED RSA-7-OB form incorporates four newly established performance measures for the IL-OIB program to capture information required to meet GPRA guidelines. These measures aim to better reflect the program's impact on individual consumers and the community. The new performance measures can be found in this collection under Part VI: Program Outcomes/Performance Measures as follows:

Measure 1.1
Of individuals who received Orientation & Mobility services, the percentage who experienced functional gains or maintained their ability to travel safely and independently in their home and/or community environment.

Measure 1.2
Of individuals who received services or training in alternative non-visual or low vision techniques, the percentage that experienced functional gains or were able to successfully restore and maintain their functional ability to engage in their customary life activities within their home environment and community.

Measure 1.3

Of individuals who received AT (adaptive technology) services and training, the percentage who regained or improved functional abilities previously lost as a result of vision loss.

Measure 1.4
Of the total individuals served, the percentage that reported that they are in greater control and are more confident in their ability to maintain their current living situation as a result of services.

Additionally, the data collection instrument has been streamlined by only requesting data that demonstrates the range of ways in which the program promotes the independence, empowerment, and community integration of older individuals who are blind.

Also, in response to new data collection standards implemented by OMB, respondents will not complete the Participant Survey, and RSA will no longer subcontract with the Mississippi State University Rehabilitation Research and Training Center on Blindness and Low Vision to collect this information.

Furthermore, the revised ED RSA 7-OB reflects the "Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education," issued on October 19, 2007. All Chapter 2 grantees will be in full compliance with this guidance by 2011.

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 information collected by RSA will be used to evaluate the program, including GPRA requirements, and make recommendations to Congress. It provides RSA with a uniform and efficient method of monitoring the program for compliance with statutory and regulatory requirements.

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.

RSA has endeavored to make the revised 7-OB Report easier to complete and submit. In addition to streamlining the report, as discussed in question 1, RSA expects virtually all States to submit the 7-OB Report electronically, primarily via email. In addition, RSA is working to implement changes in its Management Information System (MIS) that would allow grantees to complete the 7-OB directly online. Grantees will receive the revised instrument and instructions electronically via email, and will also be able to access them through the RSA website. The approved 7-OB Report will be available to the public on RSA's MIS.

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.

ED (RSA)-7-OB is the sole instrument collecting data on services provided under the Title VII, Chapter 2 program. This is the only data collection instrument used for this purpose. There is no duplication.

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.

This collection does not involve any small business or other small entities.

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.

An annual collection is required under Sec. 752(i)(2)(A) of the 1992 Amendments, and is necessary for the RSA Commissioner to respond to legislative requirements of an annual report to the President and to Congress as mandated by Sec. 13 of the Rehabilitation Act of 1973 (Attachment B). This data must also be collected annually in order for RSA to determine substantial progress required for the annual funding of formula grants to all non-competing Designated State Agencies.

7. Explain any special circumstance(s) that would cause information collection to be conducted in a manner: (1) requiring respondents to report information to the agency more often than quarterly; (2) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (3) requiring respondents to submit more than an original and two copies of any document; (4) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; (5) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; (6) requiring the use of a statistical data classification that has not been reviewed and approved by OMB; (7) 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 (8) 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.

None.

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.

During its initial development, the collection instrument and instructions were reviewed by the National Council of State Agencies for the Blind and almost 90% of the project directors funded under the program. All comments and suggestions were considered and several recommendations were adopted. IL-OIB project directors reviewed these changes and provided comments at their last meeting on March 13-16, 2007.

The revised collection instrument and instructions were posted in the Federal Register for a 60-day public comment period on February 4, 2008 (Collection Package #03560). RSA made several improvements to the data collection instrument and instructions in response to public comments received through the Federal Register as well as RSA's March 2008 IL-OIB Program Managers Conference. A summary of the public comments and RSA responses from the 60-day comment period is provided in a separate document included as an attachment in this data collection package.

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

None.

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

N/A – this information collection does not include any personally identifiable information.

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 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.

None.

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.

The burden for each response was estimated at 8 hours by several directors of projects funded under this program.

Number of respondents:	56
Frequency of response:	Annual
Hours per response	8
Annual hour burden	448

Respondent cost - 448 hours x $17/hr = $7,616

Also, RSA has done everything possible to reduce burden.

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.

No additional operational expenses are required.

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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The average review and approval of an ED RSA-7-OB form takes 2 hours. RSA staff who review the completed forms is paid at an average rate of $38 per hour. The cost of the review and approval process is 2 hours x $38/hour x 56 reports = $4,256.

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

The current OMB inventory was based on 55 respondents, because of program staff error. The corrected number of respondents is 56.

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 the report, publication dates, and other actions.

N/A

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.

N/A

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

None.