

**Supporting Statement
Title III—Alternative Financing Program
Assistive Technology Act of 1998
Data Collection Instrument**

Table of Contents

Justification

1. Necessity of the Information.....	2
2. Purposes and Uses of the Data.....	2
3. Information Technology.....	3
4. Efforts to Identify Duplication.....	3
5. Methods Used to Minimize Burden on Small Entities.....	4
6. Consequences of Not Collecting the Information.....	4
7. Special Circumstances.....	4
8. Consultation Outside the Agency.....	4
9. Payments or Gifts to Respondents.....	4
10. Assurances of Confidentiality.....	4
11. Sensitive Questions.....	5
12. Estimate of Response Burden.....	5
13. Estimate of Cost Burden of Collecting Information.....	5
14. Estimate of Annualized Cost to the Federal Government.....	5
15. Change in Burden.....	6
16. Plan for Tabulation and Publication.....	7
17. Display Expiration Date for OMB Approval.....	7
18. Exceptions to Certification Statement.....	7

Appendices

Appendix A. Summary of Title III—Alternative Financing Mechanisms

Appendix B. Title III Data Collection Requirements vs. Section 4 of the Assistive Technology Act of 1998, as Amended (P.L. 108-364), State Financing Data Collection Requirements

Justification

1. Necessity of the Information

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (ED) requests clearance for the revision and renewal of a data collection instrument, Office of Management and Budget (OMB) Control Number 1820-0662, to be completed by grantees under title III of the Assistive Technology Act of 1998 as in effect prior to the amendments of 2004 (Public Law 105-394) (AT Act of 1998).

Title III of the AT Act of 1998 authorized grants to public agencies to support the establishment and maintenance of alternative financing programs (AFPs) that feature one or more alternative financing mechanisms¹ to enable individuals with disabilities and their family members, guardians, advocates, and authorized representatives to purchase assistive technology (AT). AFPs must operate and provide progress reports in perpetuity.

Since 2000, grants have been awarded to 33 states to operate AFPs. The information collected through this data collection instrument is necessary for these grantees to comply with the reporting requirements of title III of the AT Act of 1998 and to satisfy 34 CFR 75.720, which requires them to submit an annual performance report.

In addition, section 307 of the AT Act of 1998 requires that RSA submit to Congress an annual report on the activities conducted under title III. In order to make this possible, states must provide annual progress reports to RSA that fulfill the section 307 reporting requirements. This data collection instrument has been developed to ensure that all 33 states report data in a consistent manner in alignment with these requirements.

2. Purposes and Uses of the Data

RSA will use the information collected via this instrument to:

- (1) Complete the annual report to Congress required by the AT Act of 1998;
- (2) Meet the Education Department Administrative Regulations (EDGAR) requirements; and
- (3) Comply with reporting requirements under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62).

Data collected from the grantees will provide a national description of activities funded under title III of the AT Act of 1998 to increase the acquisition of AT devices and services through alternative financing mechanisms for individuals with disabilities. In addition, RSA will use this data to inform its program management, monitoring, and technical assistance efforts. States will be able to use the data for internal management and program improvement.

3. Information Technology

¹ See Appendix A for a description of the alternative financing mechanisms.

A web-based data collection system will be developed based upon the instrument submitted for review. The paper version of the instrument is designed to translate almost directly into a web-based format; throughout the document there are numerous references to how certain sections and items will be used in the electronic system. Upon OMB approval of the paper version, a web-based application for use by the states will be designed and implemented by ED at RSA through the Management Information System (MIS). Once complete, the system will meet or exceed requirements for accessibility of Section 508 of the Rehabilitation Act of 1973, as amended (Rehab Act), the Federal Information Security Management Act (FISMA), and other applicable statutes and regulations, and industry standards.

This web-based system will allow all 33 grantees to enter and submit their data electronically at their convenience on an ongoing basis. Where appropriate, the system automatically generates totals and does other automatic calculations, saving time and reducing the chance of mathematical errors.

RSA will have immediate access to the information submitted, allowing RSA to identify which grantees have submitted their data. This access will allow RSA to generate reports, even on partial data, as requested by Congress or others. States will have similar access to their data for management purposes.

4. Efforts to Identify Duplication

Data collected on state financing activities in OMB Control Number 1820-0572 is duplicative in some cases, because the state financing activities under section 4 of the AT Act of 1998, as amended in 2004 (Public Law 108-364) (AT Act of 2004) may include AFPs. However, this proposed revision and renewal of OMB 1820-0662 would align closely with the data collection system for section 4 of the AT Act of 2004, which is OMB 1820-0572. Many states have incorporated their existing title III AFP into their section 4 programs. However, a single data collection instrument cannot capture the entire universe of data, or entities that need to report that data, for both title III and section 4. The data collection requirements of section 4 and title III are similar but not the same,² therefore it is not possible to use one as a proxy for the other because:

- Title III AFPs are funded under a separate authority;
- Title III has its own data collection requirements that differ from those of section 4; and
- Not all states have both title III and section 4 grants, and both grants do not always go to the same agency when a state does have both.

Appendix B contains a side-by-side comparison of the similarities and differences between the portions of OMB 1820-0662 and OMB 1820-0572 that apply to alternative financing mechanisms.

Otherwise, the activities, and data collected about those activities, are unique to title III of the AT Act of 1998 and do not duplicate other data collection efforts.

² See Appendix B for a side-by-side comparison of the title III and section 4 requirements related to AFPs.

5. Methods Used to Minimize Burden on Small Entities

This information collection does not involve small businesses and will not have a significant impact on substantial numbers of small entities.

6. Consequences of Not Collecting the Information

If this information is not collected, neither RSA nor states can fulfill their reporting obligations under title III of the AT Act of 1998. Those obligations are annual, so the data collection cannot occur less frequently than annually.

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

The process for developing the title III data collection instrument began in January 2007. The National Information System for Assistive Technology (NISAT), the project responsible for coordinating the development of this instrument, established a workgroup comprised of representatives from AFPs of various types. NISAT was also responsible for the development of the instrument for data collection and reporting on state financing activities in OMB Number 1820-0572 through a cooperative agreement with RSA, as required under section 6(b)(5) of the AT Act of 2004. NISAT facilitated several teleconference meetings of the workgroup through December 2007. During these meetings, AFPs provided suggestions for the general principles and features of a data collection system. RSA staff participated in all meetings. The instrument submitted for review takes the suggestions of the workgroup into account, as well as lessons learned from the development of OMB 1820-0572.

9. Payments or Gifts to Respondents

No payments or gifts are provided to respondents.

10. Assurances of Confidentiality

Confidentiality for individual consumers receiving services from a title III AFP is assured, because the states will not report information that identifies individual consumers. States will provide anecdotes about the effect of their programs on individual consumers, but states are instructed to write anecdotes in a manner that ensures their anonymity. All other data provided is reported in the aggregate.

The web-based system to be developed will not allow public access to the reporting instrument for data entry, and states will have access to their data only, so they will not be able to see or manipulate data of other states. Individual reports will be kept confidential until they have been finalized by the state and accepted by RSA.

Once a report has been finalized by the state and accepted by RSA, access to the data will be available to the public via the Internet, though the public will be able to view and not alter the data. States will be advised that their data will be available to the public in this manner.

11. Sensitive Questions

No questions included in the data collection instrument are considered sensitive.

12. Estimate of Response Burden

Thirty-three grantees will report using the web-based data collection system. It is estimated the average amount of time required to complete all responses is approximately 29.5 hours, which is 5 hours less than the previous version of OMB 1820-0662. This equals almost 974 total hours for the 33 AFPs, or 93 less than the previous version. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the data entry. This estimate is derived from knowing the burden of the previous version and reducing that burden according to the changes made to the instrument. See “Change in Burden” below.

Assuming an average hourly cost of \$30 per hour for staff members who complete the instrument, the cost burden for individual grantees is estimated to be \$885, and the total cost for the 33 grantees is estimated to be \$29,205. The average hourly cost of \$30 represents the average, fully-loaded wage rate, i.e., includes pre-tax cash wages, fringe benefits and overhead support, for several different classes of labor ranging from clerical to managerial labor, and accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional, and managerial) are expected to expend.

13. Estimate of Cost Burden of Collecting Information

There are no capital costs or equipment purchases necessary.

14. Estimate of Annualized Cost to the Federal Government

Section 6(b)(5) of the AT Act of 2004 requires that RSA award a grant, contract, or cooperative agreement to an entity to assist states with data collection and reporting. As mentioned above, NISAT, the entity that received this award, is responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with writing the annual report to Congress based on data submitted into the MIS. RSA made this award in the summer of 2006, and, subject to appropriations, anticipates providing approximately \$250,000 each year for five years to the recipient to perform the above data collection and reporting activities for title III AFPs as well as data collection and reporting system training, technical assistance, and analysis for statewide AT programs, OMB 1820-0572. The estimated annualized cost to the Federal government for the title III AFP portion of the cooperative agreement is \$52,500.

In addition, RSA also employs two program specialists at the GS-13 level with the responsibility for the administration of grants funded under the AT Act, including this data

collection. These program specialists are housed in the Service Programs Unit, which is overseen by a Unit Chief and Director. RSA staff dedicates a percentage of their time to this data collection, creating an additional cost. RSA also employs an information technology specialist in the Program Support Staff Unit, who will build the AFP data collection system in the MIS upon OMB approval of this instrument. The development and limited maintenance of this instrument in the MIS is an additional cost associated with the AFP data collection. The estimated annualized cost to the Federal government for RSA staff time is \$20,400.

15. Change in Burden

The renewal of revised OMB 1820-0662 contains significant changes that will result in a decrease in reporting burden. The estimated reporting burden for the expiring 1820-0662 was 34.5 hours per grantee, for a total of 1,067 hours.³ The estimated reporting burden for revised OMB 1820-0662 is approximately 29.5 hours per state for a total of 974 hours for the 33 states.

The previous version of OMB 1820-0662 was developed by the National Institute on Disability and Rehabilitation Research (NIDRR) using a participatory action research approach. NIDRR based estimates for the number of initial applicant surveys on FY 2003 data and prior rates of completion for the individual follow-up surveys for approved and denied applicants. RSA used these previous estimates as a starting point because use of the system over the years proved them to be fairly accurate. Burden was deducted from this estimate based on the following:

First, title III AFPs will switch from reporting data on each individual loan application to reporting aggregate, year-end data. A title III grantee will no longer report an initial applicant survey for each loan applicant. The burden estimate of the expiring instrument included 0.50 hours to complete each initial applicant survey. This revised instrument does not include this survey. Instead, grantees will only enter the information in aggregate at the conclusion of the reporting cycle, and most of this information applies only to those who receive loans as opposed to all who apply for loans. As a result, less information is required about fewer individuals.

Second, the revised data collection instrument no longer requires follow-up surveys. AFPs will no longer submit either a follow-up approval survey or a follow-up denial survey for each loan applicant. The current instrument estimates 0.50 hours to complete each survey for approved applicants and 0.33 hours to complete each survey for denied applicants. Instead, AFPs will have the opportunity to submit an anecdote of an individual obtaining a loan to purchase needed AT for use at home, in the community, or at the workplace.

Another significant reduction in reporting burden is the elimination of an additional annual survey that AFP grantees submit to the Rehabilitation Engineering and Assistive Technology Society of North America (RESNA), the entity responsible for the currently approved AFP data collection instrument. Previously, AFP grantees were required to submit a separate data collection survey on top of the 4 surveys entered into the web-based data collection system housed at the University of Illinois at Chicago (UIC) under a subcontract with RESNA. Grantees will no longer be required to submit a survey directly to RESNA as well as all 4 surveys into the UIC web-based system. Grantees also will update program changes directly into

³ When 1820-0662 was first approved, only 31 grantees existed. There now are 33 grantees.

the revised data collection instrument in the MIS housed at RSA rather than submitting them to RESNA as was past practice.

16. Plan for Tabulation and Publication

Because states provided an assurance that the alternative financing program will continue on a permanent basis, there is no end date for the reporting requirements. States will remain on a set data collection reporting cycle, with the period beginning October 1 and ending September 30 each year. The due date for grantees to submit data to RSA is December 31 of each year.

There is one exception to the AFP reporting period for the first year of data collection using this instrument. The first reporting period extends from the date of OMB approval of this instrument through September 30, 2009. For example, if this instrument is approved for use as of August 1, 2008, the first reporting period will be for 14 months from August 1, 2008 until September 30, 2009. All subsequent reporting periods will be only 12 months, beginning October 1, 2009.

The aggregate, national data derived from this collection will be used to create an annual report to Congress that is due December 31 in the year following the data collection reporting cycle. Previous versions of this report can be found at:
<http://www.ed.gov/about/reports/annual/rsa/atsg/2004/index.html>

17. Display Expiration Date for OMB Approval

RSA will display the expiration date for OMB approval of the information collection. See the Paperwork Burden Statement document.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement.