

THE SUPPORTING STATEMENT
0980-0160
Developmental Disabilities
Protection and Advocacy
Program Performance Report

A. Justification. Requests for approval shall:

1. Circumstances Making the Collection of Information Necessary

The program performance reports (PPRs) are required by legislation. The Developmental Disabilities Protection and Advocacy systems (P&As) are authorized in Subtitle C, of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act), as amended, [42 U.S.C. 15001 et seq.] (the DD Act). Each P&A is required to submit a Program Performance Report annually, as per Section 144(e) [42 U.S.C. 15044(e)].

The report is to describe the activities and resultant accomplishments carried out with the Subtitle C funds received by the P&A for the Federal fiscal year.

The collection of this information in the proposed format is both necessary and authorized. First, the information is necessary both for annual monitoring of the P&A program, as well as preparation of the Secretary's annual report to the President, the Congress, and the National Council on Disability as required by Section 105. Second, the Department is specifically authorized to collect the information in Section 144(e).

The requirement for a P&A Program Performance Report is also further emphasized in 45 CFR Part 1386.23:

(a) By January 1 of each year the Protection and Advocacy System shall submit an Annual Program Performance Report as required in Section 107(b) of the Act, in a format designated by the Secretary.

<<Note: the regulations, including their citations, are currently being updated to reflect the changes in the Act as of 2000.>>

Additionally, data is collected in the P&A Program Performance

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Report and submitted to ADD for compliance with the Government Performance and Results Act of 1993 (GPRA). In the Program Performance Reports, the P&As provide to ADD past year actual outcome data for outcome performance measures.

This is an ongoing data collection, and does not represent a change in requirements.

2. Purpose and Use of the Information Collection

The information provided in the PPRs is first used, as required in Section 107(c)(2), in the preparation of the Secretary's Annual Report to the President, the Congress, and the National Council on Disability. Secondly, the data is used to report outcome measures to Congress, as required by the Government Performance and Results Act of 1993 (GPRA). Additionally, the information is used to provide a national perspective on program accomplishments and continuing challenges. Based on this national perspective, technical assistance and management support is provided to DD P&As in the States.

The ADD currently makes some of the data from these reports available on the Internet to the general public. It plans to expand the amount of the data it makes available on the Internet.

The failure to collect standard program performance data from each State would severely compromise the Department's ability to meet its legislatively mandated reporting requirements to the President, the Congress, and the National Council on Disability. Additionally, nation-wide insight into the DD P&A program would be impossible, and no management studies would be feasible for the benefit of the program or for budget review of the benefits of the program.

This is an ongoing data collection, and does not represent a change in requirements.

3. Use of Improved Information Technology and Burden Reduction

The P&A Program Performance Report (PPR) is submitted electronically. Previous PPRs were submitted by hard copy only. This change has been a challenge both for ADD staff and for staff of the P&As. A major consequence of the electronic submission of the PPRs is enhanced ability to carefully review each PPR and to manage and analyze the data.

This is an ongoing data collection, and does not represent a change in requirements.

4. Efforts to Identify Duplication and Use of Similar Information

A careful review of the data collected in the PPRs submitted by the P&As was conducted to avoid any unnecessary duplication of program elements submitted previously.

The Financial Status Report (SF-269) was reviewed for duplication. None was found.

The P&A Statement of Goals & Priorities (SGP) was reviewed for duplication with the PPR. None was found. The SGP is prospective, showing intentions of the P&A in the coming year, while parallel reporting in the PPR is retrospective, showing how the SGP led to outcomes.

After these efforts were made to identify duplication, no similar information was found to exist currently to provide insight on the fiscal year activities and accomplishments of P&As receiving Federal funding to support activities for advocacy for individuals with developmental disabilities.

This is an ongoing data collection, and does not represent a change in requirements.

There is currently an interagency effort to study ways to reduce duplication in the program performance report across the various funding streams that P&A systems receive. The objective of this

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effort is to create a single program performance report format to be used by the P&As for reporting program performance for all the funded P&A programs. This effort is ongoing.

5. Impact on Small Businesses or Other Small Entities

The information collected does not involve, nor result in assignment of burden to any small business or other small entity. It is collected from 57 State systems designated by the governor of each State.

6. Consequences of Collecting the Information Less Frequently

Subtitle C, Section 144(e) of the DD Act requires annual program performance reports. Less frequent collection of data than that prescribed by the requirements of the Developmental Disabilities Act, Section 144(e) would violate statute.

**7. Special Circumstances Relating to the Guidelines of
5 CFR 1320.5**

There are no special circumstances governing the collection of data that are inconsistent with the established guidelines pursuant to 5 CFR 1320.5.

**8. Comments in Response to the Federal Register Notice and
Efforts to Consult Outside the Agency**

The content of the P&A Program Performance Report was developed by all 57 of the P&As on Developmental Disabilities themselves in a massive collaborative effort coordinated by the national association of the P&As, under contract with ADD. Issues of the scope, content, availability of data, format, and clarity of instructions for the P&A Program Performance Report format have been discussed with all of the P&As during the course of the development process. The P&As have had long experience now in using this form, since this is an ongoing data collection and it

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represents no change in requirements.

A 60-day comment period was provided. The solicitation of comments for the proposed information collection was published in the Federal Register, volume 73, number 47, page 12741 (March 10, 2008). No comments were received during the 60 days nor anytime thereafter.

In response to requests by P&A systems across the country, there is currently an interagency effort to design a single Program Performance Report format to be used by the P&As for reporting program performance for all the funded P&A programs. This effort has included consultations with various P&As. The effort is ongoing.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts to respondents are planned.

10. Assurance of Confidentiality Provided to Respondents

There are no data collected that requires confidentiality, and hence no assurance of confidentiality is required.

11. Justification for Sensitive Questions

No data is directly collected that is of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

The following is the annualized hour burden estimate for this information collection:

ANNUAL BURDEN ESTIMATES

Developmental	NUMBER OF	NUMBER OF	AVERAGE	TOTAL
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Disabilities Protection and Advocacy Program Performance Report	RESPONDENTS	RESPONSES PER RESPONDENT	BURDEN HOURS PER RESPONSE	BURDEN HOURS
	57	1	44	2,508

Estimated Total Annual Burden Hours: 2,508

The estimate of annual burden to the States varies very greatly with the size, program complexity and the capability of the States. Consultations with selected States indicated that a range of times would vary. The current estimate of annual burden is from 5 to 20 four-hour days, with most common figure of about 11 four-hour days. Hence, a mode of 11 such days (44 hours) is being used in these calculations.

Consequently, the estimated burden hours is 2,508 hours (57x44).

The following is the annualized cost estimate for this information collection, based on an estimated cost of \$35/hour for staff preparing the report:

ANNUAL COST ESTIMATES

Developmental Disabilities Protection and Advocacy Program Performance Report	NUMBER OF RESPONDENTS	AVERAGE ANNUAL BURDEN HOURS PER RESPONDENT	AVERAGE ANNUAL COST PER RESPONDENT	TOTAL ANNUAL COST FOR ALL RESPONDENTS
	57	44	\$1,540	\$87,780

Estimated Total Annual Cost Estimate: \$87,780

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There is no annual burden or startup cost to respondents

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resulting from collection of information for the PPR.

14. Annualized Cost to the Federal Government

This computation is based on an estimated \$35 per hour for the efforts of a Program Specialist; this estimated hourly rate includes fringe benefits.

Program specialists will devote an annualized estimate of 400 hours every year to organize and review the Program Performance Reports and to generate analyses of the information therein for staff use.

Total Estimated Federal Costs:..... \$14,000

15. Explanation of Program Changes or Adjustments

This is an on-going data collection, with no change in burden.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of this information collection are not planned to be published for statistical use.

The Program Performance Reports (PPRs) are prepared by the P&As and submitted electronically to the Administration on Developmental Disabilities (ADD) by January 1 of each year. Federal program staff review the PPRs for completeness and for compliance with the DD Act, and prepare program reviews and summaries of the information for program management studies. The data are tabulated and aggregated on a national basis (sums, averages, etc.). Other analyses of textual information are done for management studies.

The information collected within the PPR is mandated by legislation and once acquired becomes a public document; some of

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it is tabulated and made available to the public on the ADD website. The information obtained is also used to develop program priorities for ADD.

Additionally, data are collected in the PPR and submitted to ADD for compliance with the Government Performance and Results Act of 1993 (GPRA). In the State Plans, the P&As provide to ADD future year targets for outcome performance measures, while in the PPRs, the P&As report on their actual accomplishments against those targets. These performance data are reported to Congress under GPRA.

The small amount of quantitative data is summed to show national totals for reports. Analysis and reporting of the data includes pie charts and bar charts.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not Applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submission

Not Applicable.

B. Collections of Information Employing Statistical Methods

Not applicable.
No statistics are being collected.