

**The OMB Supporting Statement for the
Rehabilitation Services Administration**

**Annual Progress Reporting Form
For the American Indian Vocational Rehabilitation Services
Program**

Table of Contents

A.	Justification.....	1
A.1.	Importance of the Information.....	3
A.2.	Purposes and Uses of the Data.....	5
A.3.	Improved Information Technology.....	6
A.4.	Efforts to Identify Duplication.....	6
A.5.	Methods Used to Minimize Burden on Small Entities.....	6
A.6.	Consequences of Not Collecting the Information.....	6
A.7.	Departures from Guidelines in 5 CFR 1320.5.....	7
A.8.	Consultations outside the Agency.....	7
A.9.	Payments or Gifts to Respondents.....	7
A.10.	Assurances of Confidentiality.....	7
A.11.	Sensitive Questions.....	7
A.12.	Estimates of Response Burden.....	7
A.13.	Estimates of Cost Burden for Collecting Information.....	8
A.14.	Estimate of Annualized Cost to the Federal Government.....	8
A.15.	Changes in Burden.....	8
A.16.	Tabulation and Analysis Plan and Schedule.....	8
A.17.	Display Expiration Date for OMB Approval.....	8
A.18.	Exceptions to Certification Statement.....	8
B.	Statistical Methods.....	8
B.1.	Respondent Universe.....	8
B.2.	Sample Design.....	8
B.3.	Methods for Maximizing the Response Rate.....	9
B.4.	Tests of Procedures and Methods.....	9
B.5.	Consultations on Statistical Aspects of the Design.....	9

List of Appendices

Appendix A	Annual Progress Reporting Form for the American Indians Vocational Rehabilitation Services Program, including Burden Statement	A-1
Appendix B	Side-by-Side Comparison of Changes to Annual Progress Form.....	B-1
Appendix C	Regulations.....	C-1

Request for Clearance of Proposed Form

U. S. Department of Education Rehabilitation Services Administration Annual Progress Reporting Form For the American Indian Vocational Rehabilitation Services Program

A. Justification

1. Importance of the Information

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (ED) requests a revision to a currently approved information collection for which approval expires on July 31, 2008. This is a web-based annual reporting form that is completed by grantees funded under the American Indian Vocational Rehabilitation Services (AIVRS) program, authorized under Section 121 of the Rehabilitation Act of 1973, as amended (Public Law 93-112).

The form collects data on grantees' program activities. RSA staff will use this information to complete the annual report to Congress required by the Rehabilitation Act, and the Education Department General Administrative Regulations (EDGAR) requirements requiring annual progress reports from grantees, as well as to facilitate program planning efforts required under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62).

This data collection supports: 1) The Rehabilitation Act, which requires AIVRS grantees to report on specifically identified activities; and 2) EDGAR, which outlines annual reporting requirements that must be met by applicants and grantees. The regulatory requirements that apply to the RSA grant programs include 34 CFR Parts 75, 77, 80, 81, and 82. Specifically, 34 CFR 75.590 requires grantees to submit a performance report, or, for the last year of a project, a final report.

Additionally, as part of ED's performance reporting requirements under GPRA, RSA must collect information to support: (a) implementation of a comprehensive plan that includes goals and objectives for the program, (b) measurement of the program's progress in meeting its objectives, and (c) submission of an annual report on program performance, including plans for program improvement, as appropriate.

The revised information collection for which RSA is requesting approval is designed to fulfill all of the above requirements and needs for the AIVRS program. Appendix A contains a Microsoft WORD version of the revised form. To access the web-based form, use the following URL:

<https://www.ed.gov/programs/vramerind/index.html>

2. Purposes and Uses of the Data

RSA and ED will use the information gathered annually to (a) comply with reporting requirements under EDGAR and provide annual information to Congress on activities conducted under the program, (b) measure performance on the program's GPRA indicators, and (c) implement recommendations resulting from the FY 2004 Program Assessment Rating Tool (PART) to collect information that is consistent with the common measures for federal job training programs.

(a) Comply with Reporting Requirements Under EDGAR and Provide Annual Information To Congress

Data collected from the AIVRS grantees will provide a national description of the types of programs that VR agencies and tribal agencies operate to serve the vocational rehabilitation needs of American Indians with disabilities. These data will help policy makers better understand the barriers, opportunities, and outcomes involved in improving vocational rehabilitation services for American Indians with disabilities. RSA will also use these data in preparing its annual report to Congress required by the Rehabilitation Act. Further, grantees can use the data for their own purposes as they discuss, plan, generate support for, and implement vocational rehabilitation programs and services for American Indians with disabilities.

In order to provide the most accurate and comprehensive documentation of AIVRS activities, the form will collect information from the AIVRS grantees on the following areas:

1. Budget and Narrative
2. Project Goals and Objectives
3. Serving American Indians with Disabilities
4. VR Services
5. Educational Goals and Employment Outcomes
6. Common Measures
7. Interaction with State VR Agencies
8. Evaluation
9. Consumer Satisfaction

(b) Measure Performance on the AIVRS Program's GPRA Indicators

The indicators for AIVRS that this data collection will address include:

- 1. Percentage of all eligible individuals who exit the program after receiving services under an individualized plan for employment that achieve an employment outcome** (calculated by dividing the number of individuals who exit the program after receiving services under an individualized plan that achieve an employment outcome by the total number of individuals who exit the program after receiving services under an individualized plan for employment)

2. Cost per Employment Outcome (calculated by dividing the total Federal grant funds by the number of individuals who exited the program after receiving services that achieved an employment outcome)

3. Number of American Indians with disabilities receiving services under an individualized plan for employment.

(c) Implement PART Recommendations to Collect Information Consistent with the Common Measures for Federal Job Training Programs.

One of the recommendations resulting from the 2004 PART review of the AIVRS program was to revise the program's measures to be comparable to other job training programs and develop a strategy for collecting data to support the Common Measures for Federal Job Training Programs developed by OMB. The common measures for adult job training programs are:

- **Entered Employment:** percent of participants who were unemployed at program Entry that are employed in the first quarter after the exit quarter.
- **Employment Retention:** percent of participants who were employed in the first quarter after exit that are employed in both the second and third quarters after the exit quarter.
- **Average Earnings:** Average earnings of participants in the second plus the third quarters after the exit quarter.
- **Average Increase in Earnings:**
 - **Pre to Post Program:** Of those who were employed in the 1st quarter after exit, the average increase in total earnings from the 2nd quarter and 3rd quarters prior to the participation quarter to the 2nd quarter and 3rd quarters after the exit quarter.
 - **Post Program:** Of those who were employed in the 1st quarter after exit, the average increase in total earnings from the 1st quarter after exit to the 3rd quarter

Under the information collection that expires on July 31, 2008, the AIVRS program collects annual data on program participants that are similar to the data collected by the Department of Labor under the job training common measures in the "Entered Employment" category:

- AIVRS grantees have historically reported data on the number of individuals served and the number who have been placed into employment. The data collection that expires on July 31, 2008, collects data on the number of participants that exit the program, including both individuals who are placed in employment and individuals who have not been placed in employment but have received services from the project._

RSA proposes to revise the information collection that expires on July 31, 2008, to include data that addresses the “Employment Retention” common measure¹:

- Under the information collection that expires on July 31, 2008, AIVRS grantees report data on the number of individuals “placed” in employment. The AIVRS program uses the employment outcome definition authorized by Section 7(11) of the Rehabilitation Act of 1973, as amended. Therefore participants must maintain employment for a minimum of 90 days (3 months) to be considered a “placement”. The data collection that expires on July 31, 2008, collects data for the number of individuals who achieve an employment goal. Although this is equivalent to the 1st quarter data, the revised data collection package proposed herein includes questions pertaining to job training common measures. The questions added to section 9 of the revised instrument are as follows:
 - Indicate the number of eligible individuals who were employed 3 months after placement (the number who were employed 3 months after achieving an employment outcome (“Status 26”).
 - Indicate the number of eligible individuals who were employed 6 months after placement (the number who were employed 6 months after achieving an employment outcome (“Status 26”).
 - Indicate the number of individuals who exited after achieving an employment outcome and who have received post-employment services.
 - Indicate the number of individuals who exited after achieving an employment outcome, but were re-opened in a new case.

The Department has revised the proposed data collection package to include job retention data at 6 months after obtaining employment, as indicated above. This is equivalent to the 2nd quarter data.

3. Improved Information Technology

The use of this web-based data collection form significantly reduces grantee burden in the following ways:

- The format is user friendly and requires minimal narrative.
- During year one of a grant, a grantee will enter all relevant project information. The system provides grantees with previously entered data, allowing them to make the necessary edits to this previously entered data. Grantees will never have to re-enter data from year to year, as was required in past years when paper forms were in use.
- The web system permits grantees to enter information on an ongoing basis during the reporting period, thereby, giving grantees the option to use the system for their internal

¹ The proposed form includes other revisions that are not of a substantial manner. They will reduce the respondent burden. Please see Appendix B, for a side-by-side comparison list of the proposed revisions to the form that expires July 31, 2008.

management purposes without having to spend their own resources to develop such a tool.

- The system will total all numeric entries for an end-of-the year report.

The system uses ColdFusion and Microsoft SQL Server. A primary advantage of using this type of dynamic database is the immediate access RSA staff will have to the information grantees submit. Not only will RSA staff be able to identify, almost instantly, which grantees have submitted their completed forms (via the Internet), they can also generate reports, even on partial data, as requested by Congress or ED. The system can be programmed to send electronic mail messages to all grantee project directors prior to the due date of the annual reports. Electronic messages can also be sent to grantees that do not submit their reports on time.

The System complies with Federal Accessibility standards implementing Section 508 for Internet Applications, Part 36 CFR 1194.22, thus assuring full access to users with disabilities.

The MIS complies with all the U.S. Department of Education's security procedures. It has been accredited and C&Aid as of March 2008 for encryption of passwords and notification of policy related to federal systems.

4. Efforts to Identify Duplication

This form does not duplicate items from any other RSA data collection efforts for this program.

5. Methods Used to Minimize Burden on Small Entities

No small entities will be part of this data collection.

6. Consequences of Not Collecting the Information

The proposed data collection activity involves an annually required Congressional report and progress form from RSA American Indian grantees. If the information is not collected, data on key aspects of these programs for American Indians with disabilities will not be available; consequently, RSA would be unable to meet statutory and regulatory requirements for collection and reporting of data on grantees' activities and outcomes.

7. Departures from Guidelines in 5 CFR 1320.5

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5.

8. Consultations outside the Agency

While developing the data collection instrument that expires on July 31, 2008, RSA solicited input from the AIVRS project directors (Winter 2001) to determine clarity of the questions on an initial draft of the form and what problems respondents might have in providing the requested information. Grantees had the option of recommending changes to the form. In

January 2002, RSA and its contractor RTI participated in a conference call with AIVRS grantees to provide another opportunity to comment on the form. RTI collected all grantee comments from these two efforts and summarized the grantee comments for RSA. RSA provided RTI with their revisions to the form. RTI incorporated RSA's revisions to the form into a second version that was used with four grantees who pretested the form in Spring 2002.

In 2004, the AIVRS data collection form which expires July 31, 2008, was included in RSA's Management and Information System (MIS) database. The MIS is a system that houses all approved RSA data collections and allows for transparency of data collected by programs funds under the Rehabilitation Act of 1973, as amended. Although the data collection form was uploaded in the MIS to collect the FY 2005 data, there wasn't a 100% data entry by AIVRS grantees until FY 2006.

Since 2006, RSA Program staff has provided technical assistance to grantees and grantees provide comments and feedback regarding the functionality of the database.

In preparation for revising the form, RSA has held monthly teleconferences with the AIVRS grantees and have updated them on the proposed revisions of the form, specifically the development of data elements that will collect information to support the common measures. Additionally, RSA sent an email to the AIVRS grantees describing the proposed data elements that are being considered to respond to the common measures. Discussion of this information was one of the agenda items on a monthly teleconference and RSA requested comments from the grantees.

In FY 2008, RSA provided technical assistance to AIVRS grantees through a series of cluster trainings. The first of these trainings was delivered in February 2008. During the training RSA received comments from grantees regarding the data collection form.

9. Payments or Gifts to Respondents

No payments or gifts are to be provided to respondents.

10. Assurances of Confidentiality

Only aggregate data will be collected. There is nothing personal regarding individual program participants.

11. Sensitive Questions

The questions included in the form are not considered sensitive.

12. Estimates of Response Burden

The number of grantees funded under the AIVRS Program varies from year to year, with the average about 73 grantees reporting. Based on reporting from previous years, grantees needed an average of 16 hours to complete the reporting form that expires July 31, 2008. The revised form will decrease the response burden to 14 hours. The decrease in response burden is because some of the fields automatically populate, the system performs auto calculations, and there is a reduction in data entry. The past cost to respondents was estimated to be \$20 per hour for the instrument expiring July 31, 2008, but due to the cost of living this estimate for the revised instrument is increased to \$25 for a total cost of \$350 per respondent.

13. Estimates of Cost Burden for Collecting Information

This is an annual progress reporting form. There are no capital costs and no equipment purchases are necessary.

14. Estimate of Annualized Cost to the Federal Government

RSA will be hosting and maintaining the report web site and reporting system on ED's server. The annualized cost of operating the system is estimated to be \$5,500 in FY 2005. In addition, RSA personnel time estimated for one supervisory manager at 1% of his time for \$1,490 and two program managers, GS-13 at 20% or \$33,200.

15. Changes in Burden

The burden will decrease from 1,120 reporting hours to 1,022 reporting hours. The estimated number of proposed responses multiplied by the response burden hours computes this.

Responses: 73
Burden Hours: 14
Difference in Current OMB inventory: 98 burden hours

16. Tabulation and Analysis Plan and Schedule

RSA staff will use the information collected from the annual progress reporting form to report annually to Congress and for program monitoring purposes. RSA will generate standard reports to meet requirements of the Rehabilitation Act, EDGAR, and GPRA. The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of RSA staff, ED staff, and Congress under provisions of the Rehabilitation Act, EDGAR, and GPRA. RSA will prepare these reports according to statutory and regulatory requirements. RSA will prepare other data tabulations on an as-needed basis to meet specific information needs.

17. Display Expiration Date for OMB Approval

The three-year expiration date for OMB approval will be displayed on the Internet version of the form and hard-copy versions.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement.

B. Statistical Methods

No statistical methods will be used for this data collection, as all RSA grantees will be asked to complete the progress form. In fiscal year 2008, RSA is estimating 73 respondents.