

**Supporting Statement  
Access to Telework Program  
Rehabilitation Act of 1973, as Amended  
Data Collection Instrument**

**A. Justification**

**1. Necessity of the Information**

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (ED) requests clearance for a new data collection instrument to be completed by entities that received grants to establish and maintain Access to Telework (Telework) programs under section 303(b) of the Rehabilitation Act of 1973, as amended (Rehab Act).

Telework programs feature one or more alternative financing mechanisms to enable individuals with disabilities and their family members, guardians, advocates, authorized representatives, and employers to obtain computers and other equipment to work as employees or contractors or to become self-employed on a full-time or part-time basis. Alternative financing mechanisms include low interest loan funds, interest buy-down programs, revolving loan funds, loan guarantees, and other mechanisms. Telework programs must operate and provide progress reports to RSA in perpetuity.

Grants have been awarded to 19 states to operate Telework programs. The information collected through this data collection instrument is necessary for these grantees to comply with the reporting requirements of the Notice of Final Priority (NFP) for Telework (68 FR 56274) and to satisfy 34 CFR 75.720, which requires grantees to submit an annual performance report. This data collection instrument has been developed to ensure that all 19 grantees report data in a consistent manner in alignment with these requirements.

**2. Purposes and Uses of the Data**

This information collection will enable:

- (1) Grantees to meet the data collection requirements in the NFP.
- (2) RSA to meet the requirements of the NFP which state that the Secretary will assess grantee success in meeting the program's overall goals of increasing access to technology for disabled individuals and increase employment opportunities and competitive employment outcomes for individuals with disabilities.

(3) RSA and grantees to meet the Education Department Administrative Regulations (EDGAR) requirements related to annual reporting.

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**

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. Upon Office of Management and Budget (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 requirements for accessibility of section 508 of the 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 19 grantees to enter and submit their data electronically. Where appropriate, the system will automatically generate totals and do 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**

RSA has determined that state financing activities under section 4 of the Assistive Technology Act of 1998, as amended (AT Act of 2004) may include Telework programs, therefore data on state financing activities in OMB Control Number 1820-0572 may include some telework loans. However, the only time a loan for telework is counted as a state financing activity is when the loan is provided for assistive technology device(s) rather than general telework equipment, so not all telework loans are counted under 1820-0572. If a Telework loan is counted under both 1820-0572 and the instrument proposed herein, different information about that loan is requested in each instrument, therefore the information will not be duplicative.

The data collection requirements for state financing activities and Telework are similar but not the same, therefore it is not possible to use one as a proxy for the other because:

- Telework programs are funded under a separate authority;

- Telework has its own data collection requirements that differ from those of section 4;
- Only 19 states have both Telework and section 4 grants, and both grants do not always go to the same agency when a state does have both; and
- Many loans provided for telework cannot be counted as state financing loans because they are not for AT.

## **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 as explained above. 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 Telework data collection instrument began in February 2008. The National Assistive Technology Technical Assistance Partnership (NATTAP), the project responsible for providing technical assistance to Telework Programs established a workgroup comprised of representatives from Telework programs. NATTAP facilitated several teleconference meetings of the workgroup through April 2008. During these meetings, the representatives from Telework programs 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.

## **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 Telework program 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 the anonymity of the individual served. 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. State reports will be kept confidential until they have been finalized by the state and approved by RSA.

Once a report has been finalized by the state and approved 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**

It is estimated the average amount of time required for Telework programs to complete and submit all responses is approximately 12.5 hours. Nineteen grantees will report using the web-based data collection system. This equals 237.5 total hours for the 19 Telework programs. 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 consultations with the Telework data collection workgroup.

This data collection instrument also requires the 19 programs to report follow-up information on the direct users who received financial assistance from Telework loans one year after the closure of the loan. The one-year follow-up survey requires Telework programs to report aggregate data on the employment status of the recipient of telework equipment and whether his or her employment goals were achieved. Telework programs may collect this one-year follow-up information in a manner that best suits their needs (e.g., by phone, by mail, in-person) though they must use the survey included in this approval package.

The estimated time for Telework programs to review the instructions, collect the data from consumers, and complete and enter the one-year follow-up data represents an

average of 20 minutes per follow-up survey administered. It is estimated the average amount of time required for program staff to complete all of these follow-up survey responses is approximately one hour (based on an average total of three successful Telework loans per grantee), which equals 19 total hours for the 19 Telework programs. This estimate of response burden for the follow-up survey is included in the total amount stated above.

The burden estimate for the consumers to complete each follow-up survey is 10 minutes, the estimate that will be shown in the burden statement on the survey. Based on an average of three successful Telework loans provided per grantee annually, that is .5 hours per program for 19 programs, or 9.5 hours of burden a year. The above estimates are derived from consultations with the Telework data collection workgroup.

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 \$375, and the total cost for the 19 grantees is estimated to be \$7,125. 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 (e.g., 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**

NATTAP is the entity responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with data submitted into the MIS. The estimated annualized cost to the Federal government for NATTAP to provide states with technical assistance on the collection and submission of data reporting requirements is \$16,200.

In addition, RSA also employs two program specialists at the GS-13 level who dedicate a portion of their time to the administration the Telework program, including this data collection. These program specialists are housed in the Service Programs Unit, which is overseen by a Unit Chief and Director who also dedicate a portion of their time to Telework. RSA also employs an information technology specialist in the Program Support Staff Unit, who will build the Telework data collection system in the MIS upon OMB approval of this instrument. The estimated annualized cost to the Federal government for RSA staff time is \$14,240, based on the salaries of these staff and how their time is apportioned to Telework programs.

## **15. Change in Burden**

This proposed Telework information collection instrument will result in an increase in reporting burden because it is a new instrument. The total estimated reporting burden for this instrument is approximately 12.5 hours per state for a total of 237.5 hours for the 19 states. This includes the average estimate for each program to complete follow-up surveys as explained above.

There is an additional burden for consumers to provide responses to the Telework one-year follow survey. The total estimate is 9.5 hours for consumers that received loans from the 19 Telework programs as explained above.

## **16. Plan for Tabulation and Publication**

Because states provided an assurance that the Telework program will continue on a permanent basis, there is no end date for the reporting requirements. States will remain on a set data collection, 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. Once data is entered into the MIS and approved by RSA, the public can view it via the Internet. It is likely that NATTAP will use the data to write an annual report on the progress of the Telework program for RSA. No report to Congress or other body is required.

## **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.

## **B. Collections of Information Employing Statistical Methods**

Not applicable