

**OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES
REHABILITATION SERVICES ADMINISTRATION
TECHNICAL ASSISTANCE AND CONTINUING EDUCATION PROGRAM
NEEDS ASSESSMENT, WORKPLAN AND EVALUATION GUIDE**

REQUEST FOR OFFICE OF MANAGEMENT AND BUDGET APPROVAL

**SUPPORTING STATEMENT REQUIRED UNDER
THE PAPERWORK REDUCTION ACT**

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

OSERS funded ten new regional TACE Centers between September and December 2008 that will provide technical assistance and continuing education to state agencies that provide vocational rehabilitation (VR) and independent living (IL) services to individuals with disabilities under the Rehabilitation Act of 1973, as amended and organizations that support those entities (called partners).

The Notice of Final Priority (NFP) under which the TACE Centers were funded requires them to conduct an annual assessment of the TA and CE needs of the agencies and partners in their regions (called needs assessments). Based on the information gathered from their needs assessments, the TACE Centers annually develop workplans that identify the needs they will address and how they will address them. The needs assessments and workplans are submitted annually to the Rehabilitation Services Administration (RSA) for review and approval.

The NFP for the TACE Centers also requires TACE Centers to report data on the activities they conduct under their workplans. This data includes:

- The number of agency personnel participating in the activities;
- The type of agency personnel participating in the activities;
- The topics of the activities; and
- The participant evaluation of relevance, effectiveness, and quality of the activities¹.

RSA intends to collect all of the needs assessment information, workplan information, and data online through RSA's management information system (MIS).

2. Purposes for which the information is used.

¹ This data is consistent with Department-wide requirements for evaluation of technical assistance programs.

The data, needs assessment information, and workplan information to be collected will be analyzed and evaluated by RSA, with the assistance of a contractor, for the following purposes:

- (1) To track the TA and CE needs of state agencies under the Rehabilitation Act of 1973, as amended;
- (2) To track the progress of TACE Centers at meeting those TA and CE needs;
- (3) To determine where coordination and collaboration between TACE Centers can be achieved to maximize time and resources; and
- (4) To evaluate the performance of TACE Centers.

The TACE Centers will be evaluated not only on the basis their ability to meet the TA and CE needs of agencies and partners, but also in accordance with standard performance measures used for TA programs at the Department of Education which are:

- percentage of TA and CE services provided that are deemed to be of high quality;
- percentage of TA and CE services provided that are deemed to be of high relevance; and
- percentage of TA and CE services provided by the TACE Centers that are deemed to be useful in improving State VR agency policies and practices.

Data collected through this IC will enable RSA to calculate these performance measures.

3. Use of information technology.

TACE Centers will access the MIS through the Internet to enter their needs assessments and workplans using drop-down menus, text boxes, and other fields. RSA will pre-populate many of the fields for the TACE Center. The system automatically will build a workplan based on needs assessment information. Once a workplan has been implemented, the TACE Center will use the same system to provide data on its activities, such as the number and type of personnel who received TA and CE.

TACE Centers will survey recipients of TA or CE using their own methodology. A copy of the survey to be administered by the TACE Centers is included in this clearance package. The TACE Center is responsible for aggregating the information from the surveys and entering it into the MIS.

4. Efforts to identify duplication.

The TACE Program is a new program and no similar program exists in RSA. Therefore, there is no similar information collection.

5. Collection of information involving small entities.

None of the ten regional TACE Centers is a small entity.

6. Consequence to Federal program or policy activities if the collection is conducted less frequently.

TACE Centers need to create new needs assessments and workplans on an annual basis because they are used to determine their activities for the following year. TACE Centers can provide data on their activities at any time, but RSA will require that they update their plans with data no less than every six months. Six months after creating a workplan, the Centers will submit data that will be used as their annual progress report to determine whether they qualify for continuation funds. Six months after that, they will submit data to close out the existing workplan and begin a new one.

7. Special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

This information will be collected consistent with 5 CFR 1320.5.

8. Efforts to consult with persons outside the agency.

RSA presented to the TACE Centers a draft of the needs assessment on March 17, 2009 and a draft of the workplan and evaluation on April 21, 2009. Comments were taken during and after both presentations. Following the presentations, a contractor assisting RSA surveyed the TACE Center directors to provide more feedback and two follow-up conference calls with the directors were held. A draft of the IC was shared with the TACE Centers as of May 15, 2009, and beta-testing of the on-line system began May 22, 2009. Feedback from all of these sources was considered in completing the IC.

A 60-day Federal Register notice on this IC ended August 7, 2009. No comments were received. However, RSA held 3 teleconferences with TACE Center directors during this same period and those conference calls resulted in changes to the IC. The changes are as follows:

- A requirement to list possible experts to provide TA or CE followed by a requirement to list the expert selected has been consolidated into a single item in which the TACE describes the qualifications of the expert who will conduct the TA or CE.
- Instructions clarifying that goals are to be set and monitored by the recipient of the TA or CE and not RSA have been added.
- The requirement that TACE Centers estimate the number of participants in TA or CE events has been eliminated.
- Instructions have been added to clarify that not every possible need is included in the needs assessment – only those needs the TACE will address in the upcoming year are included.

In addition, a workgroup of TACE Center directors developed and refined evaluation questions for use by all TACE Centers. These questions have been added to the IC.

9. Payments or gifts to respondents

There are no gifts of payments to respondents.

10. Assurances of Confidentiality

Confidentiality is not an issue for this information collection. The only personally identifiable information contained in this collection will be the name of the director of each TACE Center. This information already is publicly available.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Cost estimates of the hour burden of the collection requirements.

The estimated hour burden is 1067 hours annually (400 hours for the needs assessment + 500 hours for the workplan + 167 hours for the evaluation) as shown in the breakdown below.

Needs Assessment

The estimate below includes not only the time to enter information into the MIS, but also the time to collect the information from the agencies and partners being assessed.

Number of Respondents = 10
Frequency of response = Annually
Annual hour burden per TACE = 40 hours
Annualized cost per TACE = \$1,640
Annual hour burden for program overall = 400
Annualized cost for program overall = \$16,400

Workplan

The estimate below includes not only the time to enter information into the MIS, but also the time to negotiate the workplan with agencies and partners to receive services. It also includes the time to update the workplan twice a year and enter survey data from the participant survey (see below).

Number of Respondents = 10
Frequency of response = Annually with updates twice per year
Annual hour burden per TACE = 50 hours
Annualized cost per TACE = \$2,050

Annual hour burden for program overall = 500
Annualized cost for program overall = \$20,500

Participant survey

Number of Respondents per TACE = 200
Number of Respondents for program overall = 2,000
Frequency of response = N/A (each participant will fill out survey once)
Hour burden per respondent = 5 minutes
Hour burden for program overall = 167
Annualized cost = 0 (costs included in workplan above)

13. Cost burden to respondents or record keepers from the collection of information.

There is no cost associated with the needs assessment, workplan, or participant survey that is not included in item 12 above. Respondents need only to use existing computers and Internet access for this information collection. Further, all ten TACE Centers already administer follow-up surveys to all activity participants for their own purposes.

14. Annualized cost to the Federal Government.

RSA employs a program specialist at the GS-14 level who dedicates 100% of his/her time to the administration the TACE program. RSA estimates that this program specialist will dedicate 50% of his/her time to this information collection (50% of 102,000 per year = \$51,000). RSA also employs an information technology specialist in the Program Support Staff Unit, who will build and maintain the data collection system. RSA estimates that this program specialist will dedicate 10% of his time to this information collection (10% of 102,000 per year = \$10,200). The cost of the contractor that previously has been mentioned will be approximately \$48,000 for assistance with evaluation design and analysis of data. This brings the total cost to \$109,200.

15. Reasons for change in burden.

N/A as this is a new collection

16. Publishing of the collection of information.

None of the information in this collection will be published.

17. Displaying the expiration date for OMB approval.

The expiration date will be displayed.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

There are no statistical methods employed with this collection.