<u>Summary of Proposed Changes to 1820-new, Needs Assessment and Workplan for TACE Programs</u>

Background: During the OMB public comment period on this information collection (IC), the Rehabilitation Services Administration (RSA) had a face-to-face meeting with the grantees affected by this IC and received questions/comments on the IC during and subsequent to that meeting. These comments and questions were submitted directly to RSA rather than through the Federal Register. The questions/comments resulted in discussions within RSA about acceptable changes to the IC. The changes, and the reason for the changes, are summarized below. RSA does not believe that any of the changes result in an increase or decrease in the burden of this IC. A justification for this is provided with each summary below.

Proposed Change: RSA proposes adding clarifying language to the instructions for the Needs Assessment portion of the IC. These instructions are as follows (new instructions in bold):

"You will likely identify a number of needs that RSA does not identify **through its monitoring process**. **If you identify needs in addition to those RSA identifies through its monitoring process, these needs are included in the workplan after you have determined how and when you will address the needs identified in monitoring reports, and if you have remaining resources available. When resources are sufficient to address needs not identified through RSA's monitoring process,** you provide needs assessment information **only for those needs you will** address in the next workplan. You can hold onto information about **non-monitoring** needs deferred **to later years** and enter information about those needs when you are prepared to address them."

Reason for Change: The TACE Centers subject to this IC have consistently requested guidance on how to prioritize the needs in their needs assessment because high priority needs drive the workplan. This new guidance will help them prioritize consistent with RSA's expectations.

Burden Change: This does not change the burden of the data collection, as it does not require collecting or reporting new information. This change simply helps grantees know how to prioritize the information they are collecting and reporting already. If anything, this guidance should make the process easier.

Proposed Change: RSA proposes changing the requirements for reporting activity costs in the workplan. In the version of this IC submitted to OMB, TACE Centers were required to report the actual costs of activities after they had taken place. RSA wants to modify this to instead: (a) require cost estimates before the activity rather than actual costs after, and (b) request that actual costs only be reported to RSA if the difference between the estimate and the actual cost differs by 20% for any activity with a cost of over $5,000.   We also propose to change the instructions as follows (new language is in bold):

"You will use a number field to respond to this item within the table. Enter the **estimated** cost, which includes only **easily calculable costs such as**:

- Materials for the activity (including technology development and use); and
- Travel and lodging and other arrangements (conference room rental, etc.) for the activity; or
- Or, if using a subcontractor, cost of subcontractor.

Do not include the time of TACE Center staff for either planning or delivery, or administrative, indirect, or other general overhead expenses in your cost estimate.

For any activity that costs $5,000 or more, if the actual cost of the activity is 20% more or less than your estimate provided, adjust this item to reflect the actual cost after the activity has taken place."

Reason for Change: TACE Centers requested clarification as to how the cost information would be used. As RSA staff discussed the use of this information, it was determined that the cost information was necessary in order to make decisions about the use of resources when planning delivery of TA and CE. Therefore, the information was needed as part of the workplan before the activity, rather than as an after-the-fact report. We then concluded that we needed a way to assess the accuracy of the estimates, therefore we needed to request that the estimates be changed if the actual cost is 20% above or below the estimated cost.

Burden Change: This does not change the burden in the data collection because the TACE Centers already have to estimate their costs for their own budgeting purposes and already have to calculate their actual costs for accounting purposes. We have retained only a single item, but we are asking for the information at a different point in time. Adjusting costs when the actual differs may increase burden, but we believe it will be negligible because we assume this will only occasionally happen. If anything, the burden for this item may decrease by changing the instructions to not require the inclusion of staff time in the cost estimate.

Proposed Change: RSA proposes adding two open comment fields to this IC – one open comment field in the needs assessment section and one in the workplan section. The TACE Center can use these fields to provide any additional information they believe is necessary, but the fields are not mandatory.

Reason for Change: The TACE Centers requested this addition.

Burden Change: This is no burden change because these are optional fields.

Proposed Change: RSA proposes adding "VR assistants" to the drop-down menu of choices for the "Target Audience" item in the workplan.

Reason for Change: The TACE Centers requested this addition because VR assistants are a target audience for their activities.

Burden Change: This is no burden change because it simply adds a new selection to an existing data field.

In addition to these changes, RSA needs to replace all of the "screen shots" in the submitted document with new "screen shots." Since the submission of the IC, an updated version of the MIS has been released that looks different. Only the presentation is different – the content and navigation remain the same – so there is no burden change associated with it. Switching the screen shots will make the instructions more accurate and user-friendly.