

**U.S. DEPARTMENT OF EDUCATION
REHABILITATION SERVICES ADMINISTRATION (RSA)**

**EVALUATION OF THE HELEN KELLER NATIONAL CENTER
FOR DEAF-BLIND YOUTHS AND ADULTS**

*Office of Management and Budget
Clearance Package Supporting Statement
for Paperwork Reduction Act Submissions*

Part A
Justification
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**U.S. DEPARTMENT OF EDUCATION
REHABILITATION SERVICES ADMINISTRATION**

EVALUATION OF THE HELEN KELLER NATIONAL CENTER

INTRODUCTION

The Helen Keller National Center for Deaf-Blind Youths and Adults (HKNC) provides services designed to equip consumers to live independently in their communities and/or to enhance their ability to secure meaningful employment. Eleven direct services departments located at HKNC's National Headquarters in Sands Point, New York, provide intensive services to consumers in a residential setting. Services provided to consumers include audiology, independent living, orientation and mobility, work skills, and technology. In FY 2009, HKNC Headquarters expects to serve 95 adults and to provide technology training for others, including elderly individuals who are coping with the loss of their hearing and sight. In addition to Headquarter services, which include field services and training programs, 10 regional field offices located around the United States provide referrals, counseling, and transition assistance to deaf-blind consumers and their families and technical assistance and training to service providers.

The federal share of the budget for the FY fiscal year 2009 is estimated to be more than \$7,800,000. In past years, 80 percent of the total operating budget of HKNC has come from federal appropriations. Other sources of funds are federal and state grants and contracts, payments from vocational rehabilitation (VR) agencies, and private sources. The last study of HKNC's activities was conducted more than 20 years ago.

The purpose of the HKNC evaluation is to provide RSA with independent and objective information by which to draw conclusions about the services offered by HKNC in support of individuals who are deaf-blind, their family members, and service providers, including state VR agencies. The evaluation will summarize characteristics of the populations served by HKNC between FY 2005 and FY 2008 and provide descriptive information on how HKNC serves consumers with different needs. The evaluation will also examine the relationship between HKNC and state VR agencies and how well HKNC meets the needs of the agencies, based on the perceptions of State VR

agency staff who are most familiar with the services provided by HKNC. Finally, the evaluation will include recommendations to improve HKNC programs and service delivery, including measures that could be used to assess ongoing performance of HKNC, its regional staff and functions, and its national training program.

This study will collect quantitative and qualitative data to assess the program's operations for individual consumers and organizational consumers and will also collect descriptive data that provides context to help to explain performance measurement findings. Many of the data collection strategies purposely include semi-structured interview protocols with open-ended questions and the opportunity for follow-up probes. Open-ended items will allow for exploration of practices and trends. Exploratory research on program operations and processes will require interactive discussions with study participants that closed-ended data collections do not support. While HKNC provides services nationally, RSA seeks to better understand how services may differ by region and by service population. The study will focus on implementation of services by HKNC Headquarters and regional staff, and how HKNC carries out its legislative mandate. The intent is to document processes used by HKNC in order to better understand how HKNC serves deaf-blind individuals, their families, and service providers, including state VR agencies.. All participation in the evaluation is voluntary.

Study subjects will include:

- Individuals served by HKNC who are deaf-blind;
- Their families/guardians;
- HKNC administrators and staff members;
- Professionals and allied personnel (service providers);
- State VR agency staff;
- Consumer and family organizations of individuals who are deaf-blind; and
- Other stakeholders.

The evaluation scope of work identified the following objectives:

- Provide RSA with reliable and valid information on program operations (including analysis of spending);

- Identify both the characteristics of the populations served by HKNC and the strengths and weaknesses of the program that influence HKNC's ability to serve these populations;
- Examine the relationship between HKNC and VR agencies and direct services, technical assistance, and training activities provided by HKNC's headquarters and regional programs in meeting the needs of VR agencies; and
- Make recommendations for program adjustments or improvements based on study findings, including measures that could be implemented to assess ongoing performance.

This study will be conducted by Westat (the contractor) and its subcontractors, InfoUse and Perkins School for the Blind.

Data collection will be conducted in phases, according to the type of data being collected and whether Office of Management and Budget (OMB) clearance is required for the data collection.

Archival Data

As part of the data collection, we plan to collect and review archival data including:

- HKNC Program Materials: Materials will include print and Internet descriptions of HKNC programs and services, HKNC consumers, and the needs of deaf-blind individuals, their families, and service providers. The contractor will also review publicly available HKNC annual reports. The contractor will develop forms to capture data from archival documents and the Internet. Archival documents include federal legislation, program descriptions, audits, performance measurement reports, databases, and other sources. The review of archival documents is critical to addressing the goals of the evaluation.
- GPRA and Other Performance Measures: Existing and proposed GPRA and other HKNC performance information from the Department of Education and RSA will be reviewed and analyzed. The review will include measures related to HKNC Headquarters, but

much of the effort will focus on outcome measures for regional services.

- Internet and List Serve Data Mining: Material will be mined from the Internet including list serves that focus on issues related to deaf-blind individuals. For example, the Teaching Research Institute at Western Oregon University operates a list serve for service providers (Professionals Serving Deaf-Blind Consumers).

The contractor will review archival documents and information on the Internet. Archival documents include federal legislation, program descriptions, audits, performance measurement reports, databases, and other sources. The review of archival documents is critical to addressing the goals of the evaluation.

The contractor has already conducted interviews with HKNC staff in order to gather background information that would be useful in developing other data collection instruments. These are described below.

- HKNC Department Head/Key Staff: One-person interviews of approximately one hour in length were conducted with nine HKNC department heads/key staff to collect background information that will be useful in collecting data from other populations. Nine interviews were conducted. A semi-structured interview format was used, with the focus on HKNC program operations and service descriptions and assessments of the value of various HKNC services.
- Regional Representative Interviews: The contractor conducted a group interview lasting approximately two hours with nine of the 11 regional representatives during HKNC's spring 2009 regional representative meeting at HKNC Headquarters. A semi-structured interview instrument was used to examine services offered by regional representatives and to determine if clear categories of service could be established for these services. Information collected will be used to develop logic models for HKNC regional services, which in turn will be used to analyze existing and proposed performance measures.

Other data collection activities that have not been conducted as yet include:

In-Person Interviews

- OMB and Department of Education Staff Interviews: The contractor will conduct a limited number of interviews with OMB and Department of Education staff regarding HKNC programs and performance measures after consulting with RSA to identify individuals to be interviewed using semi-structured interview guides. Such interviews will help to identify contextual information about the development of the study and potential subjects of special interest.
- Deaf-Blind Former HKNC Consumers In-Person Interviews: The contractor will conduct 36 interviews with deaf-blind consumers during site visits to three of HKNC's regional offices. Interviews will take about 40 minutes, but interviewees will be asked to be on site for about one hour to allow time to establish communication protocols with certified interpreters. Given the communication requirements of former HKNC consumers, it was determined that in-person interviews would offer the best opportunity to capture information regarding the experiences and perceptions of former consumers. The semi-structured interview instruments will provide examples and include prompts to elicit supplementary information. Westat will ensure the availability of two interpreters during interviews, since a second interpreter may be needed to assist with communication and to provide relief at the mid-point of the interview.

Telephone Interviews

- Family Member Interviews: The contractor will conduct telephone interviews with nine family members of deaf-blind consumers using a semi-structured interview instrument. We are assuming that the majority of family members of deaf-blind individuals have the ability to communicate by phone or with assistive technology. Family members will be asked about training or services they have received from HKNC, including support for regional and local deaf-

blind family associations, time spent with their family members at HKNC in New York for entrance and exit transitions, participation in HKNC case meetings for deaf-blind consumers, and services received from HKNC regional representatives.

- State VR agency Staff Interviews: The contractor will conduct telephone interviews with 20 state VR agency staff with extensive experience with HKNC services. They may have received training at HKNC Headquarters or from the National Training Team or may have extensive experience working with deaf-blind individuals as counselors. They also may have coordinated joint activities with the HKNC regional representatives. Interviews will primarily be used to selectively review email survey results and collect additional contextual, qualitative information about HKNC services that require real-time probes and dialogue with the interviewer to obtain a better understanding of state VR services provided to deaf-blind individuals, whether and how HKNC provides services to their VR agency, and how they may work with HKNC to serve deaf-blind individuals. The interviews will be used to gain a better understanding of trends and patterns identified from the surveys through real-time discussions with interviewees. Interviews will be conducted using a semi-structured interview instrument.
- Service Provider Interviews: The contractor will conduct up to 50 structured telephone interviews with service providers who received services from HKNC and who have worked with HKNC consumers. HKNC will be asked to help identify service providers who participated in an HKNC training at HKNC Headquarter New York or a training elsewhere in the country conducted by HKNC's National Training Team.
- Stakeholder Group Representative Interviews: The contractor will conduct semi-structured telephone interviews with nine national stakeholder group representatives who are familiar with HKNC services and the needs of deaf-blind individuals. The focus of the interviews will be on HKNC programs, services, and unmet needs.

E-Mail Surveys/Questionnaires

- State VR agency Survey: The contractor will conduct an email census survey of all 80 state VR agencies. This census survey is needed to elicit information about services provided to deaf-blind consumers, referrals to HKNC, and services provided by HKNC to VR agencies and staff. The survey is voluntary, but consistent with other surveys of VR agencies, RSA expects a response rate of 90 percent, or at least 72 of the 80 VR agencies.

Site Visits

- HKNC Site Visits: The contractor will conduct seven site visits to HKNC Headquarters and regional offices. Three of these site visits will be to the HKNC Headquarters, which houses the Region 2 office. During the first site visit, Westat and RSA staff were introduced to HKNC, provided a tour of the Sands Point campus, provided an orientation to HKNC services at Headquarters, introduced to some of the HKNC staff, and explored archival data that would provide information about HKNC services and consumers.

The second site visit to HKNC Headquarters coincided with the semi-annual meeting of HKNC regional representatives. Westat conducted a group interview with nine of the 11 regional representatives. Individual interviews were conducted with nine HKNC department heads/key staff.

A third site visit to HKNC Headquarters will focus on services offered by Region 2 and will coincide with in-person interviews of deaf-blind individuals. Based on analysis of the regional location of former HKNC consumers who attended training at HKNC Headquarters from July 2004 to June 2008, the largest number of former consumers was from Region 2 in Sands Point, New York. Region 2 includes New York and New Jersey. It is anticipated that 21 of the 36 completed interviews (58%) will be conducted in Region 2, consistent with the percentage of individuals in the sample frame who live in HKNC region 2 and are within 45 miles of the HKNC regional office.

Two other site visits will be scheduled. Based on analysis of the regional location of former consumers, Region 9 (based in San Diego, California), and Region 1 in Boston, Massachusetts, were chosen. It is anticipated that 10 of the 36 completed interviews (28%) will be conducted in Region 9 near the center of Los Angeles since a large number of former HKNC participants live in that area, as opposed to the area near the regional office in San Diego. It is anticipated that five of the 36 completed interviews (14%) will be conducted in Region 1. Sites were selected based on the ability of deaf-blind former consumers to travel to the regional office to participate in in-person interviews. Almost three-quarters of deaf-blind former consumers who lived within 45 miles of their regional office lived near Regions 1, 2, and 9, which led to the choice of these three regions for the site visits and interviews. The anticipated number of interviews in each location is proportionate to the number of consumers within 45 miles served by each region.

Two-day site visits to two additional regional offices will be conducted and will include regional offices that serve rural areas. It is anticipated that job placement and independent living services may be more difficult to obtain in less populous areas. Site visits to regional offices serving larger more widespread rural areas will ensure that HKNC regional services in harder-to-serve areas will be addressed in the evaluation. Contractor staff will accompany HKNC regional representatives as they provide services to deaf-blind individuals, VR agencies, and other stakeholder groups.

Activities at all sites are expected to include a tour of the regional offices, introductions to HKNC staff to understand the role of administrative staff and how they support activities of the regional representatives, introductions to staff of other related organizations that serve deaf-blind consumers (if observation of regional office staff conducting their duties include contact with such individuals), and informal discussions with the HKNC regional representatives to better understand the services that they provide and how to effectively measure those services. Site visits to the more urban

sites will be longer in order to accommodate the interviews with deaf-blind individuals.

Table 1. Evaluation questions and data sources requiring OMB Review¹

Evaluation Question	Deaf-Blind Consumer In-person Interviews	State VR Agency Staff Telephone Interview	Service Provider Telephone Interview	State VR Agency E-mail Survey
Target Number	36	20	50	80
1.1	X	X	X	X
1.2	X	X	X	X
1.3	X	X	X	X
1.4	X	X	X	X
1.5		X		X
2.1	X	X	X	X
2.2			X	
2.3		X	X	X
2.4		X	X	X
3.1	X	X	X	X
3.2		X		X
4.1				
4.2				
4.3	X	X	X	X

Research questions are listed beginning on page 12.

Table 2. Evaluation questions and additional data sources

Evaluation Question	Archival Data				In-Person Interviews			Telephone Interviews		Site Visits
	HKNC Program Descriptions	HKNC Program Measures	Other Federal Program Measures	List Serves Focusing on Deaf-Blind Issues	OMB and ED Staff	HKNC Regional Reps.	HKNC Dept. Heads/Key Staff	Family Members	Stakeholder Group Reps.	HKNC Regional Offices and HQ
Target Number	N.A.	N.A.	N.A.	N.A.	TBD	9	9	9	9	5
1.1	X	X		X	X	X	X	X	X	X
1.2	X	X		X	X	X	X	X	X	X
1.3	X	X		X	X	X	X	X	X	X
1.4		X		X	X	X	X	X	X	X
1.5	X	X			X	X	X		X	X
2.1	X	X			X	X	X		X	
2.2		X		X		X	X	X	X	X
2.3	X	X			X	X	X			X
2.4	X	X			X	X	X			X
3.1	X	X			X	X	X	X	X	X
3.2										
4.1	X	X			X	X				X
4.2		X	X		X	X				
4.3	X	X		X	X	X	X	X	X	X

Research questions are listed beginning on page 12.

A. Justification

- A1.** Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information

The Rehabilitation Services Administration (RSA) in the Office of the Assistant Secretary for Special Education and Rehabilitative Services (OSERS), Department of Education oversees formula and discretionary grant programs that help individuals with physical or mental disabilities to obtain employment and live more independently through the provision of such supports as counseling, medical and psychological services, job training, and other individualized services and social supports.

The HKNC program provides direct services for individuals with deaf-blindness in order to enhance their potential for employment and to live independently in their home communities. According to the FY 2008 budget, the federal appropriation for HKNC represented about 72.1 percent of HKNC's total budget. While approximately 62 percent of HKNC's total budget supports the operations of this program, HKNC Headquarters in Sands Point, New York provides direct independent living and VR services to a target figure of 95 adult consumers in a typical fiscal year. This is a large investment for a very small number of consumers. In FY 2007, the HKNC Headquarters in New York served only 78 adult consumers, 17 fewer than the target. The last and only study conducted of HKNC was completed in FY 1988 and covered the FY 1986 program year. The information in that study is now more than 20 years old. Therefore, an independent, comprehensive study of HKNC is needed to evaluate the effectiveness of HKNC's operations and how well it is addressing its statutory purposes and to identify changes that could be made to better address the needs of its service population. This evaluation study will address these needs as well as examine various services provided and approaches used by HKNC, and the relevance of HKNC's programs to the needs of individuals who are deaf-blind. This evaluation study will also provide useful feedback to HKNC to assist it in planning future activities and setting priorities. It will allow the Department

to fulfill its oversight responsibilities as required by the *Rehabilitation Act* Section 12(a)(5) to “. . .provide monitoring and conduct evaluations.”

RSA conducts evaluations of the Title I program with authorization under Section 14(a) of the *Rehabilitation Act*, which states:

For the purpose of improving program management and effectiveness, the Secretary, in consultation with the Commissioner, shall evaluate all the programs authorized by this Act, their general effectiveness in relation to their cost, their impact on related programs, and their structure and mechanisms for delivery of services, using appropriate methodology and evaluative research designs.

Additionally, Title 29, Chapter 21 § 1903 of the *Helen Keller National Center For Youths And Adults Who Are Deaf-Blind Act (The Helen Keller National Center Act)* authorizes monitoring and evaluation as follows:

(b)(1) The Secretary shall establish procedures for monitoring, on a regular basis, the services performed and the training conducted by HKNC.

(2) The Secretary shall, in addition to the regular monitoring required under paragraph (1), conduct an evaluation of the operation of HKNC at the end of each fiscal year. A written report of such evaluation shall be submitted to the President, the Clerk of the House of Representatives, and the Secretary of the Senate within one hundred and eighty days after the end of the fiscal year for which such evaluation was conducted.

The conduct of the last evaluation of HKNC in 1988 was followed by the suspension of the requirement to submit the annual evaluation of HKNC to Congress in 2000. Since at least 1999, HKNC has produced *Government Performance and Results Act (GPRA)* measures to provide for regular monitoring of HKNC. These measures have exclusively reported on results related to training activities conducted by staff at HKNC Headquarters in New

York, and have neglected to report on activities of the HKNC regional representatives who annually serve approximately 1,500 individuals. RSA believes that detailed examination of these measures, particularly the measures developed to report on regional services, will ensure that those measures are outcome-focused, allow for analysis of HKNC operations, and help analyze the annual GPRA measures in conjunction with more robust data collection and analysis conducted during the HKNC Evaluation.

The HKNC Headquarters in Sands Point, New York provides specialized intensive services to students to encourage the maximum level of personal development. After participating in programs at HKNC Headquarters, students return to their home communities and receive support services and assistance from service providers and from state VR agencies to maintain and enhance the skills they acquired at HKNC. The VR agencies and service providers receive training from HKNC and/or regional offices so that they can better serve their deaf-blind consumers. HKNC and service providers also train family members¹ to obtain and provide appropriate services. A large number of deaf-blind individuals receive services from a regional office only.

A2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This is a new collection. The primary audiences of the information are RSA; HKNC, including the 10 regional offices; the Office of Special Education and Rehabilitative Services (OSERS); the Office of Management and Budget (OMB); Department of Education Budget Services Office; and the state VR agencies. The information will be used for program evaluation and ongoing program improvement by both RSA and HKNC, including the development of training programs, improvement of the long-term meaningful employment of deaf-blind individuals, and helping deaf-blind individuals live independently in their home communities. The information might also contribute to legislative oversight and potential improvement of program outcomes and benefits, not just knowledge and policy.

¹ The term “family members” is used to refer to individuals who provide regular and sustained support to deaf-blind individuals and may include relatives, legal guardians, or other support providers.

The findings are intended to contribute to federal and state agency knowledge of successful and meaningful employment strategies. Additionally, findings will help identify other services and resources that would help deaf-blind individuals live independently after case closure. The findings will have policy implications for HKNC as well as state VR agencies.

The study will address the following specific research questions:

HKNC Services and Administration

- 1.1 Does HKNC meet its legislative mandates?
- 1.2 Is HKNC providing services that address the vocational and independent living needs of its consumers?
- 1.3 How do deaf-blind former HKNC participants perceive the adjustment training, independent living, and vocational services provided by the HKNC Headquarters program and regional representatives, and to what extent do they think that HKNC services help deaf-blind individuals achieve their goals?
- 1.4 How do deaf-blind former HKNC participants perceive the helpfulness of specific trainings and services?
- 1.5 How does HKNC allocate its resources? What costs are directly related to client services? What data and methodologies would be necessary to develop a measure of cost effectiveness?

Services to Specific Populations

- 2.1 Who does HKNC serve?
- 2.2 What services, training, or support does HKNC provide to families of individuals who are deaf-blind?
- 2.3 How do VR agencies and service providers who have worked or will work with deaf-blind individuals perceive the usefulness of the services provided by HKNC?
- 2.4 Do pre-service and in-service professionals perceive that the training provided by HKNC lead to enhanced capacity by VR agencies or other service providers to serve individuals who are deaf-blind?

Vocational Rehabilitation Services and Employment Outcomes

- 3.1 How do state vocational rehabilitation agency staff, service providers, stakeholder group representatives, and other stakeholders perceive of the vocational services and independent living services provided by the HKNC Headquarters program and regional representatives to individuals who are deaf-blind, and do they perceive that these services lead to or result in successful employment outcomes?
- 3.2 Do VR agencies believe HKNC is offering the right mix of services and that the services provided meet the needs of VR consumers and agencies?

HKNC Performance, Accountability, and Improvements

- 4.1 Are *GPRA* or other performance measures adequate for monitoring HKNC Headquarters and regional services performance outcomes?
- 4.2 What alternative outcome measures could be developed for regional programs and HKNC Headquarters that could improve the ability of the Department of Education to monitor HKNC operations?
- 4.3 What changes can HKNC put in place to improve program operations and results

Answers to these evaluation questions will help RSA, Department of Education, HKNC (including the 10 regional offices), the Office of Management and Budget, and the state VR agencies obtain information about programs for the populations served by HKNC and its regional offices and HKNC's interactions with the VR agencies. It will also help in understanding the support HKNC provides to other service providers and to family members of deaf-blind individuals who, in turn, support those individuals.

A3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe

any consideration of using information technology to reduce burden.

The communication methods of deaf-blind individuals, the requirements for in-depth understanding of their independent living and vocational needs, and the in-depth information needed to address the evaluation questions make it infeasible to use telephone interviews, internet-based surveys, email or mail surveys. We believe that the sense of communication isolation that some deaf-blind individuals experience will be better addressed using in-person individual interviews, allowing for a more relaxed and informative discussion.

The contractor has taken necessary means in planning this data collection activity to reduce the burden on interview subjects. These are described below. The semi-structured interview instrument will provide examples and include prompts to elicit supplementary information. The contractor will ensure the availability of two interpreters during interviews, since a second interpreter may be needed to assist with communication and to provide relief at the mid-point of the interview. Advance letters to former consumers include a description of the purpose of the evaluation, how information will be used, assurances of anonymity of interviewees, and other details required for informed consent. HKNC will obtain written acknowledgement of informed consent with confirmation of the appointment date, time, and location and will coordinate any changes needed due to conflicts or interviewee circumstances. See Appendix A for the draft letter.

Contractor staff will read the informed consent information to interviewees at the beginning of the interview to ensure that they understand the project and that their participation is voluntary. Interviews will be assigned a code number that cannot be linked in any way to identifying information. HKNC will not be provided with interview transcripts, but will receive a summary of interviews with their former consumers.

Interviews will be conducted by senior research staff members who will use digital audio recorders and will take brief notes to capture the essence of

the interviews. Taped interviews will be transcribed for later analysis. Interview transcripts will not include identifying information for interviewees.

The contractor will also conduct an email survey of all the VR agencies using readily available survey software (such as Survey Monkey). Data being collected from VR agencies are limited to what is necessary to adequately address the research questions. Because of the time that has passed since the last comprehensive evaluation of HKNC, RSA feels it is necessary to survey all 80 VR agencies to get a comprehensive picture of how HKNC is serving the needs of the agencies. In addition, information being collected is critical in determining how VR agencies and HKNC work together to address the independent living and vocational needs of deaf-blind individuals.

Interviews with service providers will be conducted by telephone to minimize the burden on respondents.

A4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no alternative source of information on the post-HKNC experiences of the deaf-blind consumers that would address the study questions. RSA's existing data do not specifically address services conducted by HKNC. This is a one-time study that will provide RSA a basis on which to measure past, current, and future performance toward helping HKNC and its regional offices as well as state VR agencies. It does not duplicate any previous or current effort underway. Two distinct protocols are anticipated to better understand how HKNC and state VR agencies work together to serve the needs of deaf-blind individuals. One is a census survey to collect information using predominantly closed-ended survey items. Following the census survey, responses will be analyzed to select a sample of 20 state VR agencies. Semi-structured interviews will be used to probe in-depth the services provided to deaf-blind individuals, services provided by HKNC and state VR agencies, the relationship between the state VR agencies and HKNC, the role and services provided by HKNC regional representatives, and how the needs of individuals who do not travel to HKNC New York for training and services are met. The interviews will be used to gain a better

understanding of trends and patterns identified from the surveys through real-time discussions with interviewees. This is not a duplication of effort, but rather an exploration of the issues using different methods that are more closely matched to the purpose of the data collection exercise.

Examination of existing HKNC performance measures will go beyond what RSA and the Department of Education are capable of accomplishing by collecting additional contextual information to more thoroughly understand HKNC performance, particularly whether HKNC services are efficient and cost effective.

A5. If the collection of information impacts small businesses or other small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The collection of information does not impact small business.

A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

It has been over 21 years since RSA conducted a comprehensive evaluation of this federally-funded grant program, and the last evaluation conducted is no longer relevant to current conditions. If the data collection is not conducted, RSA will not obtain needed information about the experiences of deaf-blind consumers served by HKNC, including information about employment status, whether they are able to live independently, and the services and resources received after closure to maintain or advance in employment. This will restrict RSA's ability to improve program management and results, including post-closure services. More importantly, RSA will not have the data and knowledge necessary to improve and advance the work of HKNC. This study will minimize the burden on the respondents without compromising the quality of the data that will be collected.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None of the special circumstances listed apply to this data collection. There are no special circumstances that would cause this information collection to be conducted in any manner listed above. This collection of information complies with the requirements of 5 CFR 1320.5.

A8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping,

disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice was published in the *Federal Register* on October 16, 2009, with an end date of December 15, 2009 on pages 53223-53224. A 30-day notice was published in the *Federal Register* on December 17, 2009 on page 66962.

As part of the survey development, Westat consulted with RSA and HKNC staff members who are very familiar with the services provided to deaf-blind individuals, families, and service providers. Based on comments received from this consultation, we have modified the questions in the survey to assist with ease of reporting. Additionally, Westat conducted pre-tests of the in-person interview with the deaf-blind consumers and telephone interviews with family members of deaf-blind consumers, service providers, and state VR agency staff and has made minor modifications to all instruments to improve data collection, streamline interview and survey protocols, and minimize the burden on respondents.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Deaf-blind individuals are being interviewed in an urban area with long commute times and high commuting costs. Deaf-blind individuals are required to travel to central locations to be interviewed because of requirements for interpreters who will assist with communication during interviews. Interviews are similar in scope and approach to cognitive interviews. While the interview instrument has been designed to take all levels of intellectual capacity into account, some aspects of the interview may present an unusually challenging burden for some interviewees. In light

of these factors, ED proposes to pay interview subjects \$65 when an interview is completed. ED believes that this payment is necessary to obtain a 70 percent response rate.

A10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

No assurances of confidentiality are being provided. It should be noted that a system of records is not being maintained for any members of the general public. HKNC maintains records on former deaf-blind consumers in the normal conduct of its business and will be contacting the former consumers to ask them to participate in this study. The contractor will only be aware of the individual's first name and first initial of their last name, and the city, state, and zip code of their home in order to identify the location of the interview and ensure that individuals live within 45 miles of the cities where interviews will be conducted. Personal information included in interviews of former HKNC consumers and family members is minimal and limited to information required to adequately address the evaluation questions. All other respondents are included as a direct result of their professional roles and responsibilities. Personal information for those individuals is not being collected. Specific steps to guarantee confidentiality include the following:

- Identifying information about the respondents will not be used or reported, and HKNC will only provide the first name and last initial of the consumers.
- In public reports, findings will be presented in aggregate. (See A16 for detailed discussion.) No reports will identify individual respondents. Any reports of information provided by VR agencies will be factual in nature and will identify the specific VR agencies, if necessary, not individuals responding on behalf of those agencies.
- Access to the sample files will be limited to authorized study staff only; no others will be authorized such access.

- All members of the study team will be briefed regarding confidentiality of the data. Each person involved in the study will sign and have notarized an affidavit of nondisclosure attesting to his/her understanding of the significance of the confidentiality requirement.
- A control system will be in place, beginning at sample selection, to monitor the status and whereabouts of all hard-copy data collection materials during transfer, processing, coding, and data entry. These include sign-in/sign-out sheets and the hand-carrying of documents by authorized project staff only.
- All data will be stored in secure areas accessible only to authorized staff members.
- When any hard copies that contain confidential information are no longer needed, they will be shredded.
- Westat's project network directory is limited to project staff, and subdirectories containing data are limited to those staff members that need access to the data to perform their job duties.

Project staff will not have access to individually identifiable information. Such information will be maintained by HKNC, and not be provided to the contractor or ED. All contractor staff members working on the study with access to the data have signed a confidentiality pledge as part of Westat policy.

As mentioned in the Introduction, RSA has contracted with Westat to conduct the proposed data collection. As part of its contract with Westat, RSA under the U.S. Department of Education established security requirements for the handling of all forms of data associated with the study, particularly regarding data collection and handling, web-based display, archiving, and dissemination. The contractor is complying with the 2002 *Federal Information Security Management Act (FISMA)* and is using NIST 800-37 and 800-53 guidance documents for certification and accreditation of its data systems for the study.

Chapter 34, Section 362.38 of the *Code of Federal Regulations* describes the general provisions for the protection, use, and release of

personal information. According to Chapter 34, Section 362.38 (d) of the *Code of Federal Regulations*, personal information may be released to an organization, agency, or individual engaged in audit, evaluation, or research only for purposes directly connected with the administration of the VR program or for purposes that would significantly improve the quality of life for applicants and eligible individuals and only if the organization, agency, or individual assures that—

1. The information will be used only for the purposes for which it is being provided;
2. The information will be released only to persons officially connected with the audit, evaluation, or research;
3. The information will not be released to the involved individual;
4. The information will be managed in a manner to safeguard confidentiality; and
5. The final product will not reveal any personal identifying information without the informed written consent of the involved individual or the individual's representative.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to obtain their consent.

There are no questions about sexual behavior or attitude or religious beliefs or other matters commonly considered private.

All sampled former HKNC participants or family members will receive information about the study, including information about the voluntary nature of their participation. They will be told that they can refuse to answer

a question if they do not want to answer it. No interview will be undertaken with former HKNC participants before they provide their consent to participate (or their legal guardian provides consent).

A12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I .**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

Information Collection. Table 3 includes estimates of the burden for all the respondents (including deaf-blind consumers, state VR agency staff, and service providers) to respond to the survey instruments or participate in interviews. The total burden for data collection is estimated to be 278 hours. The timing estimates are derived from pretest experience and are adjusted based on several factors:

- The number of target respondents for each round of data collection;
- The estimated time of one hour and 40 minutes to administer the questions for respondents; and the estimated hourly cost to respondents.

Table 3. Estimates of information collection burden

Instrument/Path	Completion s	Minutes	Hours	Estimated Hourly Cost to Respondents	Estimated Total Cost to Respondents
Deaf-blind consumers	36	6,480	108	\$1.84	\$199
Service providers	50	1,500	25	\$20	\$500
State VR agency staff — E-mail survey*	80	4,800	80	\$25	\$2,000
State VR agency staff —Interviews*	20	1,200	20	\$25	\$500
HKNC department heads and key staff*	9	540	9	\$25	\$225
HKNC regional representatives*	9	1,080	18	\$25	\$450
Stakeholder group representatives*	9	540	9	\$50	\$450
Family members	9	540	9	\$20	\$180
Total burden	222	16,680	278	N.A.	\$4,504

* Denotes that individuals are being interviewed during business hours because of their professional role. The actual cost impact on professional respondents is \$0, since respondents will be paid by their employers during burden hours.

The version of Table 3 that was included in the OMB Supporting Statement Part A dated August 31, 2009 has been modified as follows:

- The number of deaf-blind consumers being interviewed was reduced from 51 to 36, resulting in a reduction of estimated burden of 45 hours. The Department determined that 15 interviews proposed with individuals who are deaf-blind consumers and did not receive training at HKNC in Sands Point, New York was speculative, not generalizable, and thus less likely to be productive at this time.
- Information about data collections with nine or fewer respondents that would not normally be subject to OMB review have been added, as requested by OMB. The estimated number of burden hours associated with these collections is 45 hours, which means that the total estimated burden hours for data collections is 278 hours, or no change in the total burden estimate from the August 31, 2009 estimate.

The version of Table 3 that was included in the OMB Supporting Statement Part A dated April 21, 2010 and June 18, 2010 has been modified as follows:

- The Department has determined that contactor observations of regional representatives during site visits is not a data collection activity, and has removed reference to this activity in Table 3.

A13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden shown in Items 12 and 14.

- * **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors, including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- * **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- * **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no additional costs beyond the burden identified in A12.

A14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used

to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated total cost to the federal Government associated with this data collection is \$600,000. This cost represents the value of contractor services over a period of two years to perform all activities associated with the proposed data collection, including those that are not subject to OMB clearance. The average cost per year over two years is \$300,000.

A15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

This is a new collection. Therefore, the entire burden is new.

A16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

A draft and final evaluation report will be produced based on interviews with deaf-blind former HKNC consumers and other respondents. In addition, Westat will develop draft and final performance measures reports. The reports will include descriptions and analyses of HKNC's program logic models, describe existing performance measures and the extent to which the measures are sufficient, and provide an analysis of proposed measures. An outline for the draft and final performance measures reports follows.

Outline of Draft and Final Evaluation Reports

Executive Summary

1. Introduction and Evaluation Objectives

2. Methodology
3. Description of HKNC Services
 - a. Headquarters
 - b. Regional Services
 - c. Relationship Between Headquarters and Regional Services
4. HKNC Program Operations and Services
5. HKNC Service Populations and How Their Needs Are Served
6. HKNC Support to VR Agencies in Meeting the Needs of Deaf-Blind Individuals
7. Analysis of HKNC Budgets, Audits, and Levels of Financial Support to Address Service Needs
8. Evaluation Conclusions and Recommendations

Appendices

Appendix 1: Response from RSA and HKNC on substantive issues in the draft report and actions taken by Westat to address issues raised.

Appendix 2: Summary of interview protocols and interview/survey instruments.

Other appendices to be developed.

Analytical Techniques

Archival Data

Westat will summarize and selectively extract data from print materials and those found through internet searches that describe HKNC programs and services, HKNC consumers, and the needs of deaf-blind individuals, their families, and service providers. The purpose of the review is to gather information to describe HKNC programs, assist in the design of data collection instruments, and obtain information for probes about specific services during interviews. Westat will look for existing logic models of HKNC programs and will use archival data to develop or expand upon logic models

of HKNC Headquarters and regional programs. This will be used to develop a description of HKNC programs and services for the final report.

Westat will examine and analyze existing *GPR*A and other HKNC performance information from the Department of Education and RSA to detect service trends and make recommendations regarding possible refinements or development of new measures. The review will include measures related to HKNC Headquarters, but much of the effort will focus on outcome measures for regional services. To the extent that performance data are available, Westat will conduct trend analysis. Results of the analysis, along with the results from interviews with OMB, Department of Education, and HKNC staff, will be summarized as a chapter on HKNC performance measures in the draft and final reports.

Interviews

Interview notes and transcripts will be collected and organized. It is anticipated that interview instruments for different populations will contain similar questions so that summaries can be developed both by population of interest as well as across populations. Westat staff conducting qualitative analysis of interviews will receive detailed training on methods, definitions, and research approaches to ensure inter-coder reliability. Staff will perform content analysis, looking for patterns of confirming and disconfirming evidence on issues related to each of the research questions. Where appropriate, staff will isolate “pull quotes” to illustrate critical consensus points or disconfirming but critical points of view.

Survey

Westat staff will create a database into which the State VR agency survey data will be entered. Data will be manually keyed from survey forms since the relatively small number of forms makes manual data entry cost-effective. We will produce descriptive statistics for each survey item, including measures of frequency and central tendency, as appropriate. We will produce summary tables grouped by agency type (namely, general, combined, and blind agencies) for interval-level data. We will also perform cross-tabulations to detect patterns by size of agency, size of the total population served, number of staff who work with deaf-blind individuals, and

other factors regarding coordination with and use of HKNC services by VR agencies.

Open-ended items will be copied into Microsoft Word. Staff who performed the qualitative analysis of interviews will perform similar content analysis, and the results will be included in the population-level and cross-population analysis.

We will use preliminary analytic results to draw a purposive stratified sample of 20 State VR agency staff who will participate in more detailed interviews to examine more deeply HKNC support of VR agencies and services to deaf-blind individuals.

Site Visits

Site visit summaries will be developed as case notes for use by Westat staff in organizing research results.

Table 4. Anticipated schedule

Subtask	Deliverable	Due Date
HKNC 1: Convene Post-Award Project Meeting	Draft meeting agenda	October 8, 2008
	Final meeting agenda	October 13, 2008
	Draft summary of meeting results	October 21, 2008
	Final summary of meeting results	October 29, 2008
HKNC 2: Conduct Project Status Meetings	Draft summary of meeting results	Within 5 days of meeting
	Final summary of meeting results	Within 12 days of meeting
HKNC 3: Devise Evaluation Plan	Draft Evaluation Plan	December 8, 2008
	Final Evaluation Plan	February 16, 2009
HKNC 4: Undertake Evaluation		
Subtask 4.1: Develop Data Collection Instrument	Draft of instruments and/or protocols to RSA	March 17, 2009
	Instrument Review Meeting	March 27, 2009
Subtask 4.2: Pretest and Revise Instruments	Briefing on instrument pilot tests	Week of April 27, 2009
Subtask 4.3: Prepare OMB Clearance Package	Draft a single OMB Package for RSA review, including all data collection instruments and contact/cover letters.	June 5, 2009
	Revise OMB Package for RSA to forward to OMB.	August 24, 2009
	OMB Package approval. Final data collection instruments and protocols.	June 30, 2010 (estimated)
Subtask 4.4: Data Collection	Briefings on data collection (possibly at same time as Task 1 Quarterly Status Meetings), including two-page synopsis of data collection progress and preliminary findings.	June 2009
		October 2009
		February 2010
		June 2010
		October 2010
Subtask 4.5: Data Analysis	Draft Data Analysis Plan	December 4, 2009
	Final Data Analysis Plan	December 31, 2009
Subtask 4.6: Evaluation Reports and Briefing	Draft Performance Measures Report	January 28, 2011
	Performance Measures	February 28, 2011
		March 18, 2011

	Report Draft Final Report Briefing Packet Draft Final Evaluation Report Final Evaluation Report	March 31, 2011 May 31, 2011 May 31, 2011 Week of June 15, 2011
	Final Briefing Packet Final Report Briefing	

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date will be displayed as required on the survey forms.

A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.

There are no exceptions to the certification statement.