

**Rehabilitation Services Administration
Discretionary Grant Application Packages**

REQUEST FOR OMB APPROVAL

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

Justification

1. Circumstances that make the collection of information necessary.

The Rehabilitation Service Administration (RSA) administers and supports a comprehensive array of discretionary grant programs and projects that serve and assist individuals with disabilities. The programs cover a wide range of projects including special programs for Native American and Migrant and Seasonal Farmworkers, Projects with Industry, Long-Term training programs for professionals interested in careers in Vocational Rehabilitation, In-Service Training, Recreational programs, Centers for Independent Living, the Helen Keller National Center and many other programs that address issues and operate projects geared towards helping individuals with disabilities enter the workforce. These grants are awarded based on a competitive process. RSA reviews applications based on the applicant's ability to successfully meet the legislative and regulatory requirements for each program. This review process gives RSA the discretion necessary to determine which applications best address the program requirements and are most worthy of funding.

The grant application package is necessary to standardize applications for the many programs in RSA with the least amount of burden to the applicants. Without the information contained in this application package, the Department would not be able to effectively comply with the legislative mandate and conduct expert peer reviews to make grant funding decisions. Applicants, including individuals and small businesses, may elect to apply for grants. The information required by the government is minimal. RSA discourages elaborate or lengthy applications.

2. Purposes for which the information is used.

RSA is unable to use the Department of Education's approved generic application package because of the program-specific selection criteria published in: CFR 364, CFR 366, CFR 369, CFR 371, CFR 373, CFR 376, CFR 379, CFR 385, CFR 386, CFR 388, CFR 396, and CFR 398. Therefore, RSA must have its own application packages for discretionary grant competitions.

The Agency uses these grant application packages to standardize applications for the many discretionary programs in RSA. This IC includes application packages for the following programs: 84.128 G Migrant and Seasonal Farm Workers, 84.128 J Special Recreational Programs, 84.129 Rehabilitation Training Long-Term Training and

Rehabilitation Counseling, 84.132 Centers for Independent Living, 84.160 Training of Interpreters for Individuals who are Deaf and Hard of Hearing, 84.224 Assistive Technology Act Activities, 84.224C Assistive Technology Alternative Financing Program, 84.234 Projects with Industry, 84.235 Special Demonstration Projects, 84.246 Rehabilitation Training– Short Term Training, 84.250 American Indians with Disabilities, 84.263 Rehabilitation Training – Experimental and Innovative Training, 84.264 Rehabilitation Continuing Education Program, 84.265 State Vocational Rehabilitation In-Service Training, 84.275 Rehabilitation Training-General Training Clearinghouse, 84.315 Capacity Building for Traditionally Underserved Populations, 84.406 Rehabilitation Capacity Building for Traditionally Underserved Populations– Technical Assistance for American Indian Vocational Rehabilitation Service Projects and 84.904 Rehabilitation Services Project-Helen Keller National Center.

3. Use of information technology.

RSA generally requires grant applicants to submit their applications via the Department of Education’s electronic grant system and intends to continue to use e-Application or Grants.gov. The Vocational Rehabilitation Services for American Indians with Disabilities (AIVRS) program is currently the only RSA discretionary program that allows applicants the option for electronic or paper submission.

The Department intends to provide access to instructions for electronic standard forms -- SF 424 and ED 524 (OMB No. 1894-0007 and 1894-0008) to record much of the information required by P.L. 106-554; some of the required information is outside the scope of these forms, however.

RSA also generally conducts its peer review competitions using distance technology. RSA uses the e-Reader module of the U.S. Department of Education’s e-Grants Web Portal to expedite the application review process.

4. Efforts to identify duplication.

RSA’s grant programs, and therefore its grant application packages, are unique at the Department of Education. RSA is unable to use the Department of Education’s approved generic application package because of the program-specific selection criteria published in: CFR 364, CFR 366, CFR 369, CFR 371, CFR 373, CFR 376, CFR 379, CFR 385, CFR 386, CFR 388, CFR 396, and CFR 398. Therefore, RSA must have its own application packages for discretionary grant competitions.

5. Collection of information involving small entities.

The collection of information does not impact small businesses or other small entities.

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

This information is not collected from entities on a regular basis. It is collected only as a part of a grant competition. Applicants, including individuals and small businesses, may elect to apply for grants. The information required by the government is minimal. RSA discourages elaborate or lengthy applications. Most applicants elect to submit far more information than the Agency requires. Applicants provide this information voluntarily as a condition of competing for the grant. If RSA cannot collect this information from applicants, it cannot comply with its legislative mandate and conduct expert peer reviews to make grant funding decisions.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

8. Efforts to consult with persons outside the agency.

Over the past three years RSA staff has had in person, e-mail, and telephone conversations with applicants about our application process. Changes in the clarifying information and the estimates on the number of burden hours are made based on this communication.

9. Payments or gifts to respondents

There are no payments or gifts to respondents.

10. Assurances of Confidentiality

This is not applicable to this information collection.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Estimates of the hour burden of the collection requirements.

Estimates of Hour Burden for this Information Collection:

Number of Applications	1,000
Hours Needed to Complete.	40 ¹
Total Burden Hours	40,000

¹ Based on discussions with current applicants and grantees 40 burden hours is an average number of hours.

Estimated total percentage of applicants for all of the RSA discretionary grant programs is:

- 40% Institutes of Higher Education
- 30% State (includes State Universities)
- 25% Not for Profit
- 4% For-Profit
- 1% Individuals

13. Estimate of the total annual cost burden.

Estimates of Annual Cost Burden to Respondents for this Information Collection:
 Preparation of Application (\$28.00 per hour X 40 burden hours)
 ... \$1,080
 Postage and Printing (\$50.00 per application X 0 applications²)
 ... \$ 0
 Total Cost Burden (per applicant) \$1,080

Estimated total average number of application, percentage and hours by individual programs.

Note: The average number of applications, percentages and hours by individual program will change each year based on the number of competitions up for renewal. These estimates are for FY 2010 only. These estimates do not include average numbers of applications for 84.263, Experimental and Innovative programs, because we do not currently have any active grants under this CFDA. Also, the Helen Keller National Center is considered a discretionary grant program but it operates as a congressionally directed program which means there is only one application submitted for this grant from specific program. We are seeking approval for all discretionary grant programs under the authority of our office but we did not include program estimations for the ones not currently active, such as 84.264,84.263, or for programs that are targeted to a specific institution, such as 84.904.

<u>Program</u>	<u>Average # of Applications</u>	<u>% of 1000 estimated #</u>	<u>Estimated Hours</u>	<u>Amount</u>
128G	30	3.0%	1,200	\$ 33,600
129 (combined)	450	45.0%	18,000	\$504,000
132	50	5.0%	2,000	\$ 56,000
160 A and B	40	4.0%	1,600	\$ 44,800
234	10	1.0%	400	\$ 11,200
250G	50	5.0%	2,000	\$ 56,000

² RSA is requiring that all submissions be received electronic format unless a waiver is granted.

224 B (2)	50	5.0%	2,000	\$ 56,000
235L	50	5.0%	2,000	\$ 56,000
246K	30	3.0%	1,200	\$ 33,600
265 A and B	130	13.0%	5,200	\$145,600
275A	10	1.0%	400	\$ 11,200
315 C and D	30	3.0 %	1,200	\$ 22,400
400	50	5.0 %	2,000	\$ 56,000
406	20	2.0%	800	\$ 22,400
Total	1000	100%	40,000	\$ 1,108,800

14. Annualized cost to the Federal Government.

OSERS, including RSA, has a contractor to assist program staff to organize, mail, contact peer reviewers for the grant competitions. Contractor Staff Time is based on approved contract. In FY 2010, the estimated cost for 20 competitions is \$757,262, which averages out to be approximately \$37,863 per competition for contractor assistance.

RSA individual staff time for peer review is estimated at 20% of time. This includes: (1) Review of applications; (2) Recruitment of reviewers; (3) Review of peer reviewer material; (4) Actual competition; and (5) Pre-funding and competition slate preparation. The number of individual staff varies by year depending on the number of competitions.

RSA uses an average of 3 reviewers per panel. The number of panels change based on the number of priorities and the number of applications received per priority competition. Electronic Peer Reviewer reimbursement is estimated at \$200.00 per day for 3 days of Peer Review and \$200.00 for one day preparation, to total \$800.00 per reviewer.

In Person Per Diem, utilized for the AIVRS program, is figured at the Washington DC rate of 3 nights stay at \$229.00 per night (\$687) and M&IE at \$71 per day (\$213). Average cost per reviewer per day is \$284.00 and for 3 days is \$1,527.00. RSA uses 3 reviewers per panel for each competition. Only one RSA discretionary program, AIVRS, utilizes this type of review.

15. Reasons for change in burden.

There is no change in burden.

16. Publishing of the collection of information.

Each application package is printed and sent to an individual or entity upon request, or is available electronically.

17. Displaying the expiration date for OMB approval.

The OMB approval will be displayed.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used to collect this information.