

OMB SUPPORTING STATEMENT
for the
Annual Performance Reporting Forms for NIDRR Grantees

**U. S. Department of Education
Office of Special Education and Rehabilitative Services (OSERS)
National Institute on Disability and Rehabilitation Research (NIDRR)**

February 17, 2010

**Prepared by:
RTI International**

Table of Contents

A. Justification.....	1
1. Importance of the Information.....	1
2. Purposes and Uses of the Data.....	5
3. Information Technology.....	6
4. Efforts to Identify Duplication.....	7
5. Methods Used to Minimize Burden on Small Entities.....	7
6. Consequences of Not Collecting the Information.....	8
7. Special Circumstances.....	8
8. Consultation Outside the Agency.....	8
9. Payments or Gifts to Respondents.....	8
10. Assurances of Confidentiality.....	8
11. Sensitive Questions.....	9
12. Estimate of Response Burden.....	9
13. Estimate of Cost Burden of Collecting Information.....	11
14. Estimate of Annualized Cost to the Federal Government.....	11
15. Tabulation and Analysis Plan and Schedule.....	11
16. Display Expiration Date for OMB Approval.....	11
17. Exceptions to Certification Statement.....	11

Appendices

- Appendix A. OMB Burden Statement
- Appendix B. Proposed Annual Reporting Form—All Questions

List of Tables

Table 1 – Data Elements Addressed by Each NIDRR Form.....	3
---	---

A. Justification

1. Importance of the Information

The National Institute on Disability and Rehabilitation Research (NIDRR) of the Department of Education (ED) requests clearance of revised Annual and Final Performance Reporting (APR) forms to be completed by all NIDRR grantees. The forms included in this package are revised versions of those used by grantees in the following 10 programs to submit their Annual and Final Performance Reports for Fiscal Year (FY) 2009, under OMB collection number 1820-0675:

- Rehabilitation Research and Training Centers (RRTCs)
- Rehabilitation Engineering Research Centers (RERCs)
- Field Initiated Research Projects (FIPs)
- Advanced Rehabilitation Research Training (ARRT) Projects
- Model Systems (including spinal cord injury, traumatic brain injury, and burn centers)
- Disability and Rehabilitation Research Projects (DRRPs)
- Knowledge Translation (KT) Projects
- Disability and Business Technical Assistance Centers (DBTACs)
- Small Business Innovation Research (SBIR) Projects (Phase II only)
- Research Fellowships Program (RFP)

OMB's approval of the forms used in FY 2009 expires June 30, 2010.

Reporting forms for all 10 programs are Web-based; that is, all grantees will complete their annual reports via the Internet. Data collected through these forms will be used to:

- (a) facilitate program planning and management;
- (b) respond to Education Department General Administrative Regulations (EDGAR) requirements; and
- (c) respond to the reporting requirements of the Government Performance and Results Act (GPRA) of 1993 (P.L. 103-62). evaluation requirements.

Statutory Requirements for This Data Collection

NIDRR's Web-based reporting system addresses specific EDGAR requirements that must be met by applicants and grantees. EDGAR requirements that apply to NIDRR grant programs include 34 CFR Parts 75, 77, 79-82, 85-86 and 97. Specifically, 34 CFR 75.590 requires grantees to submit an annual performance report or, for the last year of a project, a final report that evaluates at least annually: (a) the grantee's progress in achieving the objectives in its approved application, (b) the effectiveness of the project in meeting the purposes of the program, and (c) the effect of the project on the participants served.

Additionally, GPRA requires all federal agencies to implement performance measurement systems that include: (1) a five-year strategic plan, (2) an annual performance plan, and (3) an annual performance report. Currently, NIDRR has met these requirements and has established performance indicators to meet the reporting requirements. The NIDRR APR System currently includes reporting forms for all 10 NIDRR grant programs.

NIDRR's GPRA plan, as part of ED's performance reporting requirements, must collect information to meet the following mandates: (a) implementation of a comprehensive plan that includes goals and objectives; (b) measurement of the program's progress in meeting its objectives; and (c) submission of an annual report on program performance, including plans for program improvement, as appropriate. The data collection system addresses nearly all of the agency's GPRA indicators, either directly or by providing information for the agency's other review processes.¹

NIDRR's program performance measures include:

Measure 1.1: The percentage of NIDRR-supported fellows, post-doctoral trainees, and doctoral students who publish results of NIDRR-sponsored research in refereed journals.

Measure 3.1: The number of new or improved NIDRR-funded assistive and universally designed technologies, products, and devices transferred to industry for potential commercialization.

Measure 3.2: The average number of publications per award based on NIDRR-funded research and development activities in refereed journals.

Form Questions

In order to provide accurate and comprehensive documentation of the activities, outputs, and outcomes of NIDRR grantees, the APR forms will collect information in several areas (see **Table 1**). Each form contains data elements keyed specifically to goals, objectives, and reporting requirements of the respective programs. Appendix B contains a paper version of all the data elements for which NIDRR is requesting clearance. The individual Annual Performance Report forms, and a Final Report Form to be used by all except RFP grantees, will be compiled from the master list of data elements.²

¹ Several additional measures (e.g., the percentage of grant applications that receive an average peer review score of 85 or higher) are based on grant review documentation.

² Grantees in the RFP program will use a Final Report Form that differs only slightly from their Annual Performance Report, as indicated in Table 1.

Table 1 – Data Elements Addressed by Each NIDRR Form

FORM SECTIONS	ARRT	KT	DBTAC	DRRP	FIP	MS	RERC	RRTC	SBIR	RFP Annual Report	RFP Final Report	Final Report (All Except RFP Grantees)
Contact and Identifying Information												
General information	X	X	X	X	X	X	X	X	X	X ¹	X ¹	X ¹
Award abstract	X	X	X	X	X	X	X	X	X	X	X	
Impairment group		X		X	X	X	X	X	X	X	X	
Budget Information												
Budget summary	X	X	X	X	X	X	X	X	X			
Funding	X	X	X	X	X	X	X	X	X			
Indirect costs	X	X	X	X	X	X	X	X	X			
Current budget expenditures (RFP only)										X	X	
Entire budget expenditures (RFP Final Report only)											X	
Budget expenditures (Final report, all except RFP)												X
Indirect cost information (Final Report, all except RFP)												X
Human Resources												
Paid staff	X	X	X	X	X	X	X	X	X	X ²	X ²	
Formal financial subcontracts	X	X	X	X	X	X	X	X	X			
Partnerships and collaborations	X	X	X	X	X	X	X	X	X	X	X	
Consumer involvement	X	X	X	X		X	X	X	X	X	X	
Planning for Outcomes and Significant Outputs												
Outcome-oriented goals	X	X	X	X	X	X	X	X	X	X	X	
Projects and Activities												
Research projects	X	X	X	X	X	X	X	X	X	X ³	X ³	
Development projects	X	X	X	X	X	X	X	X	X	X ³	X ³	
Dissemination and knowledge translation projects		X	X	X	X	X	X	X	X			
Capacity-building activities—Fellows	X			X	X	X	X	X	X			
Capacity-building activities—Graduate students	X			X	X	X	X	X	X			
Performance of fellows and graduate students	X			X	X	X	X	X	X			
Capacity-building activities—Additional information	X			X	X	X	X	X	X			
Training projects	X	X		X	X	X	X	X	X			
Technical assistance activities		X		X	X	X	X	X	X			
Additional notes				X	X	X	X	X	X			

FORM SECTIONS	ARRT	KT	DBTAC	DRRP	FIP	MS	RERC	RRTC	SBIR	RFP Annual Report	RFP Final Report	Final Report (All Except RFP Grantees)
Award-Specific Sections												
Model systems clinical care						X						
Knowledge translation awards—Projects and activities		X										
Disability Business Technical Assistance Centers— Training projects, technical assistance, and dissemination			X									
Performance: Outputs and Associated Accomplishments												
Type 1 Outputs: Publications	X	X	X	X	X	X	X	X	X	X	X	
Type 1 Outputs: Most Important Publications	X	X	X	X	X	X	X	X	X	X	X	X
Type 2 Outputs: Tools, measure, and intervention protocols	X	X	X	X	X	X	X	X	X	X	X	X
Type 3 Outputs: Technology products and devices	X	X	X	X	X	X	X	X	X	X	X	X
Type 4 Outputs: Informational products	X	X	X	X	X	X	X	X	X	X	X	X
External use and adoption of NIDRR-funded outputs	X	X	X	X	X	X	X	X	X	X	X	X
Other accomplishments and contributions	X	X	X	X	X	X	X	X	X	X	X	X
Overall status of outcome-oriented goals	X	X	X	X	X	X	X	X	X	X	X	
Additional Information												
Award summary over entire performance period												X
Future implications											X	X

¹ Subset of items

² Demographic/diversity information for Switzer fellow only

³ RFP grantees characterize their fellowship as either a research or a development project

Major Changes in the Reporting Form

The Web-based system used for FY 2009 reporting incorporates a number of features to meet NIDRR's information needs while minimizing burden. The reporting form and system currently in use were designed so that information provided by grantees each year is automatically carried forward to the next. Under this design, grantees need only review and, if necessary, edit their previous year's entries in order to complete subsequent annual reports. To further reduce burden, the form is designed so that, instead of describing their accomplishments, grantees simply select their most important accomplishments from among the outputs they report. Data from grant applications, such as contact and budget information, are preloaded for efficiency. To facilitate grantee and NIDRR staff review of information submitted, the system includes system-generated tables that summarize information entered in specific sections. The Web-based system also carries forward information from one section of the form to the next; for example, information on outcome-oriented goals is carried forward for convenient linkage with projects/activities and publications.

Major changes to the reporting form for FY 2010 include:

- ***Addition of a feature that allows grantees to upload IRB approval documents*** for their research and development projects, in order to comply with NIDRR's internal recordkeeping requirements.
- ***Identification of specific research and development projects that were most critical to production of grantee outputs*** (i.e., publications, tools, technology products, and informational products).
- ***Addition of a new section on external use and adoption of NIDRR-funded outputs*** by researchers, practitioners/clinicians, service providers, educators and others.

The latter two sections are designed to minimize respondent burden and ensure accurate reporting by presenting lists of previously entered projects or outputs. Grantees may select from these lists, where applicable, rather than duplicating information entered in previous annual reports or in earlier sections of the current annual report.

Analysis

The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of NIDRR staff, ED staff, and Congress under provisions of EDGAR and GPRA. NIDRR will prepare these reports according to regulatory requirements. NIDRR will prepare other data tabulations on an as-needed basis to meet specific information needs. In addition, the APR system will support NIDRR's external evaluation activities.

2. Purposes and Uses of the Data

NIDRR and ED will use the information gathered annually from these data collection efforts to comply with EDGAR, provide Congress with the information mandated in GPRA,

enable grantees to complete the 524B reporting requirements, provide OMB information required for assessment of performance on GPRA indicators, and support an external evaluation being conducted by the National Academy of Sciences. Data collected from the 10 grant programs will provide a national description of the research activities of approximately 276 NIDRR grantees.

NIDRR is charged in various ways with providing technical assistance and resources regarding disability research and will be better able to carry out that mission with the data collected through the APR reporting system. Research centers can also use their own annual performance data as they discuss, plan, generate support for, and implement research, development, and knowledge translation/dissemination programs and services for individuals with disabilities. These data will provide information that policy makers can use in better understanding the barriers, opportunities, and outcomes involved in improving services for individuals with disabilities.

3. Information Technology

This information collection request is for a Web-based reporting system; grantees enter their data electronically through a secure Internet Website. This information collection system covers 10 grant programs funded or administered by NIDRR, and each grantee submits its information using a reporting form that is unique to the program mechanism under which it is funded. The 10 forms meet the reporting requirements for the following programs:

1. Rehabilitation Research and Training Centers (RRTCs)
2. Rehabilitation Engineering Research Centers (RERCs)
3. Field Initiated Research Projects (FIPs)
4. Advanced Rehabilitation Research Training (ARRT) Projects
5. Model Systems—(includes spinal cord injury, traumatic brain injury, burn centers)
6. Disability and Rehabilitation Research Projects (DRRPs)
7. Knowledge Translation (KT) Projects
8. Disability and Business Technical Assistance Centers (DBTACs)
9. Small Business Innovation Research (SBIR) Projects (Phase II only)
10. Research Fellowships Program (RFP)

The Web-based reporting forms are developed and maintained using Macromedia's Cold Fusion Application Server software (version 5.0) and SQL Server 2000. Microsoft's Internet Information Server is used as the primary Web server software. Collected information is stored in a relational database. Access to the data in this database is provided using a combination of Microsoft's Open Database Connectivity (ODBC) technology and database query functionality provided by Cold Fusion Markup Language.

A primary advantage of this type of dynamic database is the immediate access NIDRR staff have to the information grantees submit. Not only are NIDRR staff able to identify, almost instantly, which grantees have submitted their completed forms (via the Internet), they can also generate reports, even on partial data, as requested by Congress or ED. The system can be programmed to send electronic mail messages to all grantee project directors prior to the due date of the annual reports. Electronic messages are also sent to grantees that do not submit their

reports on time; federal project officers are thus able to spend less time telephoning grantees to ensure that annual reporting requirements are met.

Use of a Web-based data collection form minimizes grantee burden in submitting an annual report. Where appropriate, the reporting form automatically generates totals, saving grantees time and reducing the chance of arithmetical errors degrading the accuracy of program data. Another burden-reducing feature of the Web system permits grantees to enter information on an ongoing basis during the reporting period. During year one of a grant, a grantee will enter all relevant research project information; in subsequent grant years, the system will provide grantees with previously entered data, allowing them to make only the necessary edits rather than re-enter data from year to year, as they have in the past using paper forms. Finally, NIDRR's contractor, RTI International, will provide any necessary technical assistance to grantees, expediting the process.

RTI has a proven track record of developing Web-based reporting systems that are accessible to persons with disabilities. The reporting forms contained in this clearance package will meet or exceed requirements for accessibility contained in Section 508 of the Rehabilitation Act of 1973 and all other relevant statutes and regulations. RTI has worked closely with the ED Assistive Technology Team to maximize the accessibility of the reporting systems it has created for NIDRR and other ED agencies since 1998. To the extent possible, RTI will make any requested changes necessary to ensure that the Web-based reporting forms reflect the state-of-the-art in Internet accessibility practices.

4. Efforts to Identify Duplication

The ten forms contained in this clearance package do not duplicate items from any other NIDRR data collection efforts.

5. Methods Used to Minimize Burden on Small Entities

This information collection will involve the small businesses that have received grants under the SBIR program. The other NIDRR programs covered by this data collection request are not small businesses or small entities. The number of businesses awarded SBIR grants by NIDRR varies each year; in FY 2009 a total of 13 small businesses had Phase II grants and were required to report using the APR tailored for that program.

The following methods will be used to minimize the reporting burden placed on SBIR grantees:

- The SBIR reporting form will contain fewer data elements than the reporting forms of most other programs.
- Recipients of Phase II grants will be able to use data entered in previous years' reporting forms as a starting point for creating each subsequent annual report. There will be no need to reenter data that are unchanged, such as project abstracts, key staff information, general contact information, or narrative of goals and objectives.

- Where appropriate, the Web-based reporting system will automatically generate totals, saving the grantees the time necessary to make those computations.
- Reporting forms can be opened and closed at any time, allowing the grantees to complete their reports at their convenience.

Any remaining burden on small businesses is unavoidable, if data are to be collected from the SBIR grantees in accordance with GPRA and EDGAR reporting requirements.

6. Consequences of Not Collecting the Information

The proposed data collection activities involve an annual required data collection from NIDRR grantees. If the information is not collected, data on key aspects of programs and services for individuals with disabilities will not be available; consequently, NIDRR would be unable to meet statutory and regulatory requirements for collection and reporting of data on grantees' activities and outcomes.

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

NIDRR has revised its reporting forms based on further analysis of the agency's information needs and its experience in collecting and analyzing data for FYs 2006-2009. Input on revisions came not only from NIDRR's senior staff but also from RTI's analysis of technical assistance requests for the period, as well as its own recommendations. The public had the opportunity to comment during the 60 and 30 public comment period. The 60 day Federal Register was dated April 5, 2010 and the 30 day was dated June 7, 2010.

9. Payments or Gifts to Respondents

No payments or gifts are to be provided to respondents.

10. Assurances of Confidentiality

APR instructions state the following:

Under the provisions of the Government Performance and Results Act (GPRA) of 1993, NIDRR has responsibility to develop a strategic plan that includes performance goals, objectives, indicators, and measures. As with all other agencies in the federal government, beginning in March 2000, NIDRR reports annually to Congress on the status and progress in meeting these performance objectives. To prepare these reports for Congress, NIDRR will draw on information from two primary sources:

(1) information that grantees submit annually in the web-based performance reporting form; and (2) information from the external evaluation being conducted by the National

Academy of Sciences that reviews the quality of grantee outputs and accomplishments. The first results from this evaluation will be available in 2012. NIDRR's intent is that this reporting form will continue to be the standard annual report of progress from all grantees. This report form contains relatively minor revisions to the last annual progress report form approved by OMB. .

The full contents of individual grantee performance reports will not be published on the Web as stand-alone documents for public use. However, data on individual grantees will be used to provide supporting documentation for the external evaluation being conducted by the National Academy of Sciences. In addition, these data will inform agency program planning and priority development. NIDRR may make aggregate information from the APRs available on the Web at the program level (e.g., REERCs, RRTCs,) or by portfolio or area of the Long-Range Plan (e.g., Health and Function, Technology). The one exception to the primary aggregate use of individual APR information occurs in conjunction with NIDRR's knowledge translation (KT) efforts and accountability requirements. To support these activities, select publications and other outputs and outcomes reported by grantees in the APR are publicized in NIDRR outreach vehicles and incorporated into performance accountability reports. Questions regarding potential uses of the information submitted by individual grantees should be directed to Mary Darnell (NIDRR) at (202) 245-7316.

As a National Institute of Standards and Technology certified and accredited system, the Web-Based Reporting System for NIDRR Grantees incorporates numerous features that protect the security of grantee information. System access for grantees and NIDRR staff may be authorized only by NIDRR's designated System Owner, and the majority of NIDRR staff (i.e., except senior staff) have access only to reports for specific grants that they are assigned to monitor and to aggregate data. Grantee contacts designated by NIDRR must respond to an electronic message from RTI and confirm their contact information before receiving initial passwords (which provide access only to their own reporting forms), and passwords must be changed at initial login. Three unsuccessful login attempts by any user result in system lockout, with administrator intervention required to unlock the account. The reporting system operates in an encrypted Secure Sockets Layer environment behind a firewall, which is configured at an appropriate level to protect the network.

11. Sensitive Questions

The questions included in the form are not considered to be sensitive.

12. Estimate of Response Burden

NIDRR has reviewed the APR form carefully to ensure that all requested information is necessary and to reduce burden to the extent possible. The Web-based system has been designed so that, whenever possible, information entered by grantees is carried forward from one year to the next, with only verification and any necessary updating of that information required. The design of the system also provides for preloading or uploading of information from other sources (e.g., budget data from grant applications and abstracts submitted to the National Rehabilitation

Information Center). Given these features, as well as grantees' increasing familiarity with the system and reporting requirements, we have estimated the average amount of time required to complete the reporting form at 52 hours in a grantee's first year of award. In subsequent years, grantees will be asked to update that information, which we anticipate will require approximately 22 hours for NIDRR's major programs (i.e. RRTC, RERC, MS, DRRP) and 10 hours for the other program mechanisms.

The FY 2009 universe of NIDRR grantees required to report using the current Web-based annual project performance reporting system totaled 276, distributed across program mechanisms as follows:

RRTC:	33 grants
RERC:	25 grants
MS:	37 grants
DRRP:	33 grants
FIP:	92 grants
ARRT:	19 grants
KT Projects:	8 grants
DBTAC:	10 grants
SBIR:	13 grants
RFP:	6 grants

While the number of grantees will vary from year to year, all grantees will be required to submit an annual performance report. Based on an average of 52 hours to complete the reporting form in a grantee's first year of award and a cost to respondents of \$30 per hour, the total estimated cost per respondent in the first year of award is \$1,560, and the total cost for all 276 grantees is \$430,560. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the form.

In subsequent years, the estimated response burden is approximately 22 hours for NIDRR's major programs (i.e. RRTC, RERC, MS, DRRP) and 10 hours for the other program mechanisms. At a cost to respondents of \$30 per hour, the total estimated cost per respondent in subsequent years is \$660 for the major programs and \$300 for the other program mechanisms. The total cost for all 128 grantees in the major programs is \$84,480, and the total cost for all 148 grantees in the other program mechanisms is \$44,400.

The estimated cost to respondents of \$30 per hour represents the average, fully-loaded wage rate, i.e., includes pre-tax cash wages, fringe benefits and overhead support, for four different classes of labor ranging from clerical to managerial labor. The average wage rate accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional, and managerial) are expected to expend in preparing the report.

	First year of award	Subsequent years	
		Major programs	Other programs
Number of direct respondents	276	128	148
Average hours per response	52	22	10
Total burden hours	14,352	2,816	1,480
Cost per hour	\$30	\$30	\$30
Total cost	\$430,560	\$84,480	\$44,400

13. Estimate of Cost Burden of Collecting Information

These are annual and final reporting forms. There are no capital costs nor are any equipment purchases necessary.

14. Estimate of Annualized Cost to the Federal Government

RTI International, of Research Triangle Park, NC, will continue to operate the Web-based reporting system under contract to NIDRR. The cost of revising the system used in FY 2009, as required by changes in the APR forms and expanded functionality, is estimated at approximately \$45,000. The annualized cost of operating the system, including preparation of reports, provision of technical assistance to grantees and NIDRR staff, and other activities, is estimated to be approximately \$238,000.

15. Why Has the Burden Changed

Estimated burden has increased 802 hours to allow for completion of a new APR section that collects data on external use and adoption of NIDRR-funded outputs.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

There are no plans for publication of this information.

17. Display Expiration Date for OMB Approval

NIDRR will display the expiration date for OMB approval of the information collection.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement.