

RSA Response to OMB Questions 6/11/09

Supporting Statement:

1. (p. 2) Justification “2”: What is defined as a “sound basis” for future requests?

RESPONSE: In determining a sound basis for future requests, the following data items are analyzed: the number of individuals served; the number of individuals receiving information and referral; the number of cases handled and in what area the issue arose; and litigation and non-litigation activities that impact systemic change.

2. (p. 2) Justification “2”: The data has been used to “indicate trends” in the provision of services. What is the value of these trend indications and how are these trends acted upon?

RESPONSE: RSA looks at the trends in the numbers served and the types of issues addressed by the PAAT programs. In the course of monitoring the PAAT programs, RSA looks at these trends and compares them with the national trends to determine how specific PAAT programs are performing.

3. (p. 4) Justification “10”: Assurances of confidentiality is based upon nature of this “aggregate report.” How aggregated is the data? At what level is this aggregated data considered truly confidential?

RESPONSE: The data is confidential because RSA receives no individual level data through the PAAT PPR.

4. (p. 5) Justification “12”: Average respondent time is estimated at “16.0” hours. What is the breakdown of these 16 hours?

RESPONSE: The 16 hours includes times necessary for gathering information stored in case management systems and case files, the calculation of aggregate data, and the preparation of the report.

5. (p. 6) Justification “14”: Annual cost to federal government is calculated using “85.5” hours. How was this number calculated?

RESPONSE: There are 57 PAAT reports submitted to RSA each fiscal year. The time required to review each of these reports is approximately 1.5 hours. This totals 85.5 hours per year.

PAAT Program Performance Report Document:

6. General Comment: This instrument makes many references to an instruction manual. Please send over an electronic copy of that manual, as it is not in ROCIS.

RESPONSE: The instructional manual was included in the packet sent forward by RSA. It is included here as an attachment. Some of the answers to the following questions make reference to the instructional manual.

7. General Comment: Given that earlier in the Supporting Statement this document is estimated to take at least two full working days to complete, is there any save functionality or version control in relation to this instruments? Are users able to make changes once a page or question has been answered?

RESPONSE: Yes. The reports are entered into RSA's Management Information System (MIS). The MIS has a "save" function which allows grantees to work on the report, save it, and return to it at a later date. Once the grantee has completed the report and is ready to submit it to RSA, there is a button labeled "mark as complete and submit to RSA." Once the report is marked as complete by the grantee, changes cannot be made unless the grantee requests that we at RSA open the report back up for further edits. Usually, once a report is submitted to RSA as complete, the grantees do not request to make further edits.

8. (p.4, 5) Section C and D Headings: Is it possible to make these two headings more differentiated? A grantee may mistake these two sections as being one and the same. Possibly underline/italicize "By Your Agency" and "By External Media Coverage".

RESPONSE: The differentiation is explained in the Instructional Manual pages 4-5.

9. (p. 4) Section C: Method of Dissemination 3. Is the frequency of PSAs/Videos Aired by the Agency counted by the number of distinct productions by the agency or the number of times these productions aired?

RESPONSE: See the Instructional Manual page 5.

10. (p. 6) Section A. Individuals 1. In parentheses, text reads "carryover from prior". Perhaps it should read "carryover from prior year" or "carryover from prior fiscal year"?

RESPONSE: We added the words "fiscal year." The revised form attached here.

11. (p. 6) Section A. Individuals 3. In parentheses, text reads "1 + 2". Please change this to read "1 plus 2" to match with formatting of text in parentheses in Individuals 5.

RESPONSE: Change made. The revised form attached here.

12. General Comment for following data elements: Often a sub-grouping of an area/type/reason/etc. will have an "Other-specify" category. How are users able to specify these categories? There seems to be no qualitative entry boxes in these instances.

RESPONSE: In the "Other-specify" categories, there are narrative boxes in the MIS that allow grantees to add details. Users can paste in text from a word processing document. Each box allows up to roughly 50 pages worth of text.

13. (p. 7) Section C. When reporting the total number of AT devices received, is there any consideration for individuals with carryover devices? This distinction was made in population count, but not made in this instance.

RESPONSE: No. Please see the Instructional Manual pages 8-9

14. (p. 7, 8) Sections D and E. Wording in parentheses for “Total” rows differ. In one instance “must” was used, while in the other “should” was used. Please make this consistent, or explain why they should not be consistent.

RESPONSE: These totals are web-generated and the language is correct the way it stands. Please see the Instructional Manual pages 9-12.

15. General Comment: For much of the “Total” rows in data tables, there seems to be a requirement that totals match earlier numbers calculated. Is there a way to have an automated “check” built into the web-generated calculations of these tables?

RESPONSE: There is an automated edit check built into the MIS. When a grantee hits the “submit” button in MIS, the MIS runs an edit check. If errors come back, the grantee must correct the errors before the report will be accepted by the MIS as complete and submitted.

16. General Comment: For Part III, please explain the how Department is using this information.

RESPONSE: During monitoring, RSA uses this information to look at whether there are populations or certain disabilities types that are un-served or underserved in the state by the PAAT program. RSA also looks at trends in these areas across the programs nationally.

17. (p. 11) Section E. How is a disabling condition “deemed to be most important?”

RESPONSE: Please see the Instructional Manual page 16

18. (p. 11) Section E. How does the Department use this very specific data?

RESPONSE: During monitoring, RSA uses this information to look at whether there are populations or certain disabilities types that are un-served or underserved in the state by the PAAT program. RSA also looks at trends in these areas across the programs nationally.

19. (p. 13) Section A. When considering “Non-Litigation Systemic Activities”, a grantee may need more description/examples of what these activities are. What are these activities? Is this covered in the instruction manual?

RESPONSE: Please see the Instructional Manual page 20.

20. (p. 13) Section B. 1. How is “the potential for systemic change” measured?

RESPONSE: The “potential for systemic change” refers to litigation in which a change in policy or practice is at issue.

21. (p. 15) Section C. How is “litigation-related monitoring” defined?

RESPONSE: Please see the Instructional Manual page 26.

22. (p. 17) Section D. How are “the most significant accomplishments” measured/defined?

RESPONSE: Please see the Instructional Manual page 29.

23. General Comment: In general, how does this document relate to the established “status quo?” Without this information collection, how is the PAAT system affected?

RESPONSE: Please refer to the answer to question 6 on page 2 of the Supporting Statement. If you require further information than what is already provided, please clarify.