SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. 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.

   To maximize the use of funds appropriated for formula grant programs, the *Rehabilitation Act of 1973*, as amended (the Act), authorizes the commissioner to reallot to other grant recipients that portion of a recipient's annual grant that cannot be used. The Rehabilitation Services Administration (RSA) reallots funds for the Basic Vocational Rehabilitation State Grants (VR), Supported Employment State Grants (SE), Independent Living State Grants, Part B (IL-Part B), Independent Living Services for Older Individuals Who Are Blind (IL-OB), Client Assistance (CAP), and Protection and Advocacy of Individual Rights (PAIR) programs. The authority for RSA to reallot formula grant funds is found at sections 110(b)(2) (VR), 622(b) (SE), 711(c) (IL-Part B), 752(j)(4) (IL-OB), 112(e)(2) (CAP), and 509(e) (PAIR) of the Act.

2. 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.

   The information will be used by the RSA State Monitoring and Program Improvement Division (SMPID) to reallot formula grant funds for the awards mentioned above. For each grant award, the grantee would be required to enter the amount of funds being relinquished and/or any additional funds being requested.

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

   The collection of information will be completed using the RSA Management Information System (RSA-MIS). RSA grantees currently enter required State Plan and Federal Financial Reporting data (e.g., SF-269, SF-425) into the RSA-MIS. Each grantee has a secure ID and password which is required to logon to the RSA-MIS. This information collection will use the same login credentials to ensure uniformity with currently approved data collections.

Collecting information through regular mail and fax submissions can result in delays in processing reallotment requests. Requests mailed to RSA can take a week or more to arrive and then must be entered manually into a spreadsheet for tracking. Frequently, grantees will submit an initial request that is later amended prior to the submission due date. Amendments further delay reallotment due to the time required to process changes and re-enter data. Submission of the reallotment information through the RSA-MIS will enable the grantees to change the information up to the due date of the submission. It will also reduce the need for RSA SMPID staff to enter data into a separate spreadsheet for tracking and calculating the revised grant award amounts, thereby reducing the chance of data entry errors.

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

    The Department has not identified any duplication, there are currently no other systems in place to automatically collect this data for RSA reallotments. This data collection method will allow the grantees an electronic submission process to provide the grant award name and amount for each award the grantees receive. This information will be populated automatically using the proposed data collection method of the RMS-MIS. Burden is minimal for grantees as the calculated total amount of the new award is automatically calculated, there are currently no other systems in place allowing for this systematic process.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

    This information collection does not impact small entities.

6. Describe the consequences 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.

    Failing to reallocate the formula grant awards on an annual basis would result in a loss of program funds for grantees able to meet the match requirements. If not realloted, funds which grantees are unable to match would be unavailable to meet the employment needs of individuals with disabilities and would revert to the U.S. Treasury.

7. 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;

  This information will only be collected on an annual basis.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

  The RSA-MIS form will be available at least 30 days prior to the required annual submission date.

- requiring respondents to submit more than an original and two copies of any document;

  Copies will not be required due to electronic submission.

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

  Data will be maintained in the RSA-MIS and therefore, result in less paperwork requirements for grantees.

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

  The information collected will not be connected to a statistical survey.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

  The information collected does not require statistical analysis or classification.

- 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

  The information collected does not require a pledge of confidentiality and is available through FOIA.

- 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.

The information collected does not include any proprietary trade secrets or other confidential information.

8. 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.

   The 60-day notice soliciting public comment on this information collection was published in the Federal Register on June 23, 2010 (Volume 75, Number 120), Pages 35773-35774. No comments were received. The 30-day public comment period will be published at the time of OMB submittal.

   Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

   RSA program staff consulted with several state VR agencies. The state VR agencies' responses indicated that this information collection was a great idea and it would save them a lot of time (to actually enter the required information would take one to two minutes). Thus, RSA received positive feedback on the system: state VR agencies verbally told RSA program staff that this greatly expedited their submission of information.

   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.

   There are no known circumstances that may preclude consultation at least once every three years.

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

   No payment or gift was provided to any respondents.

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

    No assurances of confidentiality are being made to respondents.

11. 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. The 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 be taken to obtain their consent.

    No data of a sensitive or private nature is being requested.

12. 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 16 of IC Data Part 1.

    - Provide estimates of annualized cost to respondents of 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 14.

        In order to best determine an hour burden estimate, the Department requested from six vocational rehabilitation (VR) finance directors (grantees) feedback regarding an electronic process for reallotment, the grantees indicated overwhelmingly that collecting the data through a MIS would decrease the time and effort it takes them to respond.

        The respondents estimated it would take less than 2 minutes per award to enter the data online. The primary information necessary for the grantee to determine whether to relinquish and/or request funds is tracked using quarterly SF-425 submissions. Therefore, the grantees do not need to complete additional analyses or calculations prior to completing the RSA Grant Reallotment form.

	Annual Burden
Number of respondents	140
Frequency of response	2.87
Total annual responses	402
Hours per response	0.03
Total hours	12
Cost per hour	$20
Total cost	$240.00

13. 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 contracting out information collection 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.

Total Annualized Capital/Startup Cost : $ .00
Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : $ .00

14. Provide estimates of annualized cost 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

    Collecting the information through RSA-MIS would substantially decrease the amount of time required to complete the reallotment process and decrease the amount of Federal expenses to collect this data. The amount for federal cost is low and is actually a huge savings compared to collecting the data through non-electronic methods.

    A draft of the electronic version of the form has already been developed. As a result, the costs to make the form "live" would be minimal. Data support for the RSA-MIS is provided by RSA staff. The electronic equipment necessary to support the RSA-MIS is already in place; therefore, there would be no additional costs for equipment. The Department estimates total Federal cost as $342. A GS-level 14 staff member will review and process reallotment entries at the rate of $57 per hour for an estimated total time of 6 hours ($57 x 6 hours = $342 Federal cost).

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

    There is no change to the 12 burden hours currently in the OMB inventory. RSA is seeking OMB approval for a three-year extension of this previously approved information collection (OMB approved the emergency clearance of this information collection on July 16, 2010).

16. 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.

    Once the reallotment process is complete, any adjustments to the grantees award amount are available online from the Department of Education's Grant Award Database. The information is publically available. This process occurs annually after the close of the fiscal year.

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

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

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement identified in the Certification of Paperwork Reduction Act.