

**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.

The Rehabilitation Services Administration (RSA) within the Office of Special Education and Rehabilitative Services of the U.S. Department of Education requests clearance to extend the existing reporting form for Projects With Industry (PWI) program. The program is authorized under Section 611 of the Rehabilitation Act of 1973 (the Act), as amended (Public Law 93-112) as well as regulations in 34 CFR part 379.

The current PWI collection package collects data that is used to: (1) evaluate the performance of grant recipients with respect to their compliance with evaluation standards developed pursuant to section 611(d)(1), as required under section 611(f)(3) (B) of the Act; (2) determine whether a grantee's performance meets the requirements for continuation funding as required by section 611 (f)(4); (3) comply with mandated annual reporting requirements in section 611(a)(5); and (4) evaluate the performance of the program and its grantees with respect to measures established pursuant to the Government Performance and Results Act and the job training common measures.

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 annual reporting form will be used to collect data on grantees' program activities to respond to the annual report to Congress required by the Act, the Education Department General Administrative Regulations (EDGAR) and program regulations, determine whether a grantee's performance meets the requirements for continuation funding, and facilitate program planning efforts required under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62). The information collected, as it has in the past, will be aggregated in order to provide information to OMB, policy makers and the public in addressing whether this program is effective in meeting its purpose.

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 given to using technology to reduce burden.

The collection of this information involves the continued use of the Rehabilitation Services Administration's (RSA) web-based Management Information System (MIS) for collecting information on grantees progress on an annual basis. Currently, all of the PWI grantees submit the PWI reporting form via the MIS. The use of this electronic means of collection is easier, faster and user-friendly for the grantees compared to submitting the reports on paper. The use of RSA's electronic system should not add to the grantee burden to report the information needed.

4. 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.

RSA has reviewed existing program reporting requirements to identify duplicate data collection requirements. These data are not available from other sources.

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.

The regulations do not have a significant economic impact on small businesses or entities. These entities are required to collect and submit the same information as other grantees in accordance with section 611 of the Act. However, small businesses are not adversely impacted by these requirements nor will they create a negative economic impact on their activities.

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.

If the collection of this additional information is not conducted, RSA would not be able to meet the statutory and regulatory requirements regarding performance or to collect job retention and earnings information that is consistent with the common measures for federal job training programs. The legislative mandate requires that data be collected

on an annual basis. To collect data less frequently would fail to fulfill the requirements of the legislation.

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;
- 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 than 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 that 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.

No special circumstances would cause this information collection to be conducted in a manner outside of the guidelines set forth in 5 CFR 1320.5

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.

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.

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.

The Department will publish a 60 and 30 day notice in the Federal Register for the public opportunities to comment.

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

No payments or gifts will be provided to respondents.

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

The MIS is designed so that only the Project Director of record and/or an individual approved by the Project Director can enter the actual report for their Federal award number with their own usernames and passwords. No other grantee can obtain access to any other grantees' reporting form via the Internet. Additionally, only RSA-identified staff has access to the system's database to view and print reports.

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 questions of a sensitive nature will be asked.

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.

The burden of the collection of information includes a total of 67 Projects With Industry grantees. All grantees will be required to complete an annual reporting form. RSA estimates that the grantees will average 90 hours to complete the reporting form, which includes time to review the instructions, gather existing data, complete the form and review it for accuracy. Based on estimates for grantees to report on the PWI reporting form, RSA estimates the cost to be \$20 per hour for a total cost to respondents of about \$1,800 per respondent or \$120,600 in total.

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 acquiring and maintaining 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	:	<hr style="width: 50%; margin-left: auto; margin-right: 0;"/> \$ .00
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RSA does not foresee any annual cost burden (other than the hour burden shown in item 12 above) to respondents resulting from the collection of this information.

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.

RSA personnel time estimated for four grants management specialist, GS-13, at 5% or \$17,806.

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

The burden change is a result of natural attrition in the respondent pool and not a material change.

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.

RSA will use the information collected to report annually to Congress and OMB and for program monitoring purposes. RSA will generate standard reports with aggregate data to meet the requirements of the Act, EDGAR, and GPRA.

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 is not seeking approval to not display the expiration date for OMB approval of the information collection. That display is appropriate for 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.

#### **B. Collections of Information Employing Statistical Methods**

No statistical methods will be used for this data collection. All Projects With Industry grantees will be required to complete this information collection and all data will be aggregated. No statistical method would reduce burden or improve the accuracy of the results.