

## SUPPORTING STATEMENT

### FOR PAPERWORK REDUCTION ACT SUBMISSION

#### Independent Living Services for Older Individuals who are Blind

##### 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.

Sec. 752(i)(2)(A) of the *Rehabilitation Act of 1973*, as amended, (attachment A) and the corresponding regulations in 34 CFR 367.11(d) require each grantee under this program to submit an annual report to the Commissioner of the Rehabilitation Services Administration (RSA) on essential demographic, service and outcome information.

The difference between this data collection instrument and the previous one is the revision made to the four performance measures added in 2007 to capture information that may be required to meet GPRA guidelines. These performance measures can be found under Part VI: Program Outcomes/Performance Measures as follows:

##### Measure 1.1

Of individuals who received AT (assistive technology) services and training, the percentage who regained or improved functional abilities previously lost as a result of vision loss.

##### Measure 1.2

Of individuals who received orientation and mobility (O & M) services, the percentage who experienced functional gains or maintained their ability to travel safely and independently in their home and/or community environment.

##### Measure 1.3

Of individuals who received services or training in alternative non-visual or low vision techniques, the percentage that experienced functional gains or were able to successfully restore and maintain their functional ability to engage in their customary life activities within their home environment and community.

##### Measure 1.4

Of the total individuals served, the percentage that reported that they are in greater control and are more confident in their ability to maintain their current living situation as a result of services.

Revisions to these established program performance measures consists of the following additional five items:

E1. Enter the Number of individuals served who reported feeling that they are in greater control and are more confident in their ability to maintain their current living situation as a result of services they received. (Closed/inactive cases only)

E2. Enter the number of individuals served who reported feeling that they have less control and confidence in their ability to maintain their current living situation as a result of services they received. (Closed/inactive cases only)

E3. Enter the number of individuals served who reported no change in their feelings of control and confidence in their ability to maintain their current living situation as a result of services they received. (Closed/inactive cases only)

E4. Enter the number of individuals served who experienced changes in lifestyle for reasons unrelated to vision loss. (Closed/inactive cases only)

E5. Enter the number of individuals served who died before achieving functional gain or experiencing changes in lifestyle as a result of services they received. (Closed/inactive cases only)

These performance measures were added to better reflect the program's impact on individual consumers and the community.

Additionally, the data collection instrument has been streamlined to optimize the usefulness of information collected by only requesting data that demonstrates the range of ways in which the program promotes the independence, empowerment, and community integration of older individuals who are blind.

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 collected by RSA will be used to evaluate the program, including any new GPRA requirements, and make recommendations to Congress. It provides RSA with a uniform and efficient method of monitoring the program for compliance with statutory and regulatory requirements.

The information collected via the Form available cannot be used or modified for use of the purposes described in Item 2 above.

ED (RSA)-7-OB is the sole instrument collecting data on services provided under the Title VII, Chapter 2 program.

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.

This collection uses the RSA's central reporting system which allows states to submit their information electronically. The decision to promote the use of this system was made to provide an option to respondents to submit required information more quickly and easily. This system also auto-calculates numbers and identifies errors before reports can be submitted, which reduces both state and federal government burden by allowing States to correct errors quickly and easily before the reports are submitted to the federal government for review.

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.

This is the only data collection instrument used for this purpose. There is no duplication.

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 collection does not involve any small business or other 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.

An annual collection is required under Sec. 752(i)(2)(A) of the 1992 Amendments, and is necessary for the RSA Commissioner to respond to legislative requirements of an annual report to the President and to Congress as mandated by Sec. 13 of the Rehabilitation Act of 1973 (Attachment B). This data must also be collected annually in order for RSA to determine substantial progress required for the annual funding of formula grants to all non-competing Designated State Agencies.

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.

There are no special circumstances that would require this information to be collected in a different manner than set forth in the Act.

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.

During its initial development, the collection instrument and instructions were reviewed by the National Council of State Agencies for the Blind, and almost 90% of the project directors funded under the program. All comments and suggestions were considered and several recommendations were adopted. A special workgroup recommended the current changes for the ED RSA-7-OB reporting form and the elimination of the participant survey. IL-OIB project

directors reviewed these changes and provided comments at a meeting on June 23, 2010.

A 60 day and 30 day notice was published in the Federal Register for public comment.

Also, in response to new data collection standards implemented by OMB, respondents will not complete the Participant Survey.

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

No payment or gift has been 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 written request does not contain specific or personal information.

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.

The written request does not contain any questions of a sensitive nature.

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.

- |    |                              |             |
|----|------------------------------|-------------|
| a. | Number of respondents        | -- 56       |
| b. | Frequency of response        | -- Annually |
| c. | Total annual responses (axb) | -- 56       |
| d. | Hours per response           | -- 6*       |
| e. | Total burden hours (cxd)     | -- 336      |
| f. | State hourly rate of salary  | -- \$20     |
| g. | Total cost (exf)             | -- \$6,720  |

\* The hour burden associated with this information collection is estimated at 6 hours per State or Territory. The estimated hour burden per State or Territory is not expected to vary significantly. Estimated burden hours are founded on judgments from previous State written request submittals for similar RSA grants.

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.

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.

No additional operational expenses are required.

14. Provide estimates of annualized cost to the Federal government. Also, provide 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.

a.	Review of each written request	-- .16 hour
b.	Number of written requests to review	-- 56
c.	Total time to review written requests	-- 9 hours
d.	Federal hourly rate of salary	-- \$38
e.	Total cost (cxd)	-- \$4,256

The average review and approval of an ED RSA-7-OB form takes 2 hours. The RSA staffer who reviews the completed forms is paid at an average rate of \$38 per hour. The cost of the review and approval process is 2 hours x \$38/hour x 56 reports = \$4,256, annual federal cost.

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

The reduction of 112 hours is an adjustment resulting from an increase in the number of reports submitted electronically as compared to the previous submission.

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.

The information collected will not be published for statistical use.

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.

This document is not seeking OMB approval not to display the expiration date.

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

This document meets each of the criteria outlined in the "Certification for Paperwork Reduction Act Submissions."

**B. Collection of information employing statistical methods:**

This is a legal document and does not require the use of any statistical methods in obtaining information.