REHABILITATION SERVICES ADMINISTRATION
ACCESS TO TELEWORK PROGRAMS/SECTION 303(b) OF THE REHABILITATION ACT OF 1973, AS AMENDED
Annual Progress Report for the Access to Telework Program under the Rehabilitation Act of 1973, as Amended

REQUEST FOR OMB APPROVAL

SUPPORTING STATEMENT REQUIRED UNDER THE PAPERWORK REDUCTION ACT

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) of the U.S. Department of Education (ED) requests clearance for a revised data collection instrument to be completed by entities that received grants to establish and maintain Access to Telework (Telework) programs under section 303(b) of the Rehabilitation Act of 1973, as amended (Rehabilitation Act).

Telework programs feature one or more alternative financing mechanisms to enable individuals with disabilities and their family members, guardians, advocates, authorized representatives, and employers to obtain computers and other equipment to work as employees or contractors or to become self-employed on a full-time or part-time basis. Alternative financing mechanisms include low interest loan funds, interest buy-down programs, revolving loan funds, loan guarantees, and other mechanisms. Telework programs must operate and provide progress reports to RSA in perpetuity.

Grants were awarded to 19 states in 2003 to operate Telework programs. The information collected through this data collection instrument is necessary for these grantees to comply with the reporting requirements of the Notice of Final Priority (NFP) for Telework (68 FR 56274) and to satisfy 34 CFR 75.720, which requires grantees to submit an annual performance report. This data collection instrument has been developed to ensure that all 19 grantees report data in a consistent manner in alignment with these requirements.

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.

RSA has used and will continue to use the information collected via this instrument to:

(1) Enable grantees to meet the data collection requirements in the NFP.

(2) Enable RSA to meet the requirements of the NFP which state that the Secretary will assess grantee success in meeting the program's overall goals of increasing access to technology for disabled individuals and increase employment opportunities and competitive employment outcomes for individuals with disabilities.

(3) Meet the Education Department Administrative Regulations (EDGAR) requirements related to annual reporting by grantees.

In addition, RSA uses this data to inform its program management, monitoring, and technical assistance efforts. States will be able to use the data for internal management and program improvement.

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.

A web-based data collection system will be maintained based upon the instrument submitted for review. The paper version of the instrument is designed to translate almost directly into a web-based format. Upon Office of Management and Budget (OMB) approval of the paper version, a web-based application for use by the states will be designed and implemented by ED at RSA through the Management Information System (MIS). Once complete, the system will meet requirements for accessibility of section 508 of the Rehabilitation Act, the Federal Information Security Management Act (FISMA), and other applicable statutes and regulations, and industry standards.

This web-based system allows all 19 grantees to enter and submit their data electronically. Where appropriate, the system automatically generates totals and does other automatic calculations, saving time and reducing the chance of mathematical errors.

RSA will have immediate access to the information submitted, allowing RSA to identify which grantees have submitted their data. This access will allow RSA to generate reports, even on partial data, as requested by Congress or others. States will have similar access to their data and data from other states for management purposes.

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.

Data collected in this instrument is not duplicative of information collected by other programs. This is a unique program. No data of this type is available elsewhere.

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 involve small businesses and will not have a significant impact on substantial numbers of 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.

If this information is not collected, neither RSA nor states can fulfill their reporting obligations under the Notice of Final Priority for the Telework Program (68 FR 56274). Those obligations are annual, so the data collection cannot occur less frequently than annually. There is no other mechanism to track the investment and use of these Federal funds.

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.

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5, and requires no special circumstances.

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 instrument submitted for revision is essentially a renewal of the current instrument. RSA, RESNA, and Telework Program representatives agreed that the revised instrument captures the data reporting requirements of the states funded under the Rehabilitation Act. However, the group recommended the elimination of the section in the instrument containing optional reporting data elements, which reduces the burden to grantees. This recommendation was accepted and is reflected in this revised information collection package. The new annual Telework instrument was published in the Federal Register for a 60-day comment period and 30-day response to comments to solicit public feedback.

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

No payments or gifts are provided to respondents.

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

There are no assurances since all data is aggregate and there is no identifying 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.

No questions included in the data collection instrument are considered sensitive.

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 Department estimates that the average amount of time required for Telework programs to complete and submit all responses for the current instrument is approximately 12.5 hours. Nineteen grantees will submit reports, and will use the web-based data collection system. This equals 237.5 total hours for the 19 Telework programs. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the data entry. This estimate is derived from consultations with the Telework data collection workgroup.

This data collection instrument also requires the 19 programs to report follow-up information on the direct users who received financial assistance from Telework loans one year after the closure of the loan. The one-year follow-up survey requires Telework programs to report aggregate data on the employment status of the recipient of telework equipment and whether his or her employment goals were achieved. Telework programs may collect this one-year follow-up information in a manner that best suits their needs (e.g., by phone, electronically, by mail, in-person) though they must use the survey included in this approval package.

The estimated time for Telework programs to review the instructions, collect the data from consumers, and complete and enter the one-year follow-up data represents an average of 20 minutes per follow-up survey administered. It is estimated that the average amount of time required for program staff to complete all of these follow-up survey responses is approximately one hour (based on an average total of three successful Telework loans per grantee), which equals 19 total hours for the 19 Telework programs. This estimate of response burden for the follow-up survey is included in the total amount stated above.

The burden estimate for the consumers to complete each follow-up survey is 10 minutes. Similarly, for the cumulative direct users served by each Telework program, the average amount of time to provide responses is 0.5 hours (based again on an average of three successful Telework loans administered by the grantee), which equals a total estimate of 9.5 hours among those individuals with disabilities that received Telework loans from the 19 programs. The above estimates are derived from consultations with the Telework data collection workgroup.

Nineteen grantees will report using the proposed web-based data collection system. It is estimated the average amount of time required to complete all responses is approximately 11 hours per program, which is 1.5 hours less than the current version of OMB 1820-0687. This equals 209 total hours for the 19 Telework programs plus the 9.5 hours consumer response time for a cumulative 218.5 hours, or 19.0 hours less than the current version. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the data entry. This estimate is derived from knowing the burden of the previous version and reducing that burden according to the changes made to the instrument. See “Change in Burden” below.

Assuming an average hourly cost of $30 per hour for staff members who complete the instrument, the cost burden for individual grantees is estimated to be $330, and the total cost for the 19 grantees is estimated to be $6,270. The average hourly cost of $30 represents the average, fully-loaded wage rate, i.e., includes pre-tax cash wages, fringe benefits and overhead support, for several different classes of labor ranging from clerical to managerial labor, and accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional, and managerial) are expected to expend.

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	: $ .00

There are no capital costs or equipment purchases necessary.

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.

RESNA is the entity responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with data submitted into the MIS. The estimated annualized cost to the Federal government for RESNA to provide states with technical assistance on the collection and submission of data reporting requirements is $16,200.

In addition, RSA also employs two employees at the GS-13 and GS-14 level who dedicate a portion of their time to the administration of the Telework program, including this data collection. These program specialists are housed in the Service Programs Unit, which is overseen by a Unit Chief and Director who also dedicate a portion of their time to Telework. RSA also employs an information technology specialist in the Program Support Staff Division, who will maintain the Telework data collection system in the MIS upon OMB approval of this instrument. The estimated annualized cost to the Federal government for RSA staff time is $14,240, based on the salaries of these staff and how their time is apportioned to Telework programs.

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

The proposed instrument eliminates an entire section of optional information that is not required for submission by the Telework grantees, reducing the burden from approximately 12.5 hours to 11 hours per state. Section C. Telework Optional Data Elements, which are not annual reporting requirements for the Telework grantees, has been proposed for removal from the current instrument. The information collected in this optional data section includes: 1. Types of Telework Programs (partnership loans or revolving loans), 2. Interest Rates (lowest and highest interest rates established by policy), 3. Loan Amounts (lowest and highest loan amounts established by policy), 4. Repayment Terms (shortest and longest repayment terms established by policy), and Loan Guarantee Requirement, the percentage of the loans that must be repaid by the Telework Program to the lender in case of default as established by the agreement with the lender. Since the data reported under C. Telework Optional Data Elements of the current instrument is not required, grantees did not report this information uniformly across programs. If every grantee doesn’t report in this section, then the data can’t be reported in aggregate form. This optional section contains information about program features and descriptions that may or may not change on an annual basis. Since there is limited to the annual reporting of this optional information, the decision was made to further reduce the burden to all grantees by eliminating this section from the current instrument in the MIS.

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.

Because states provided an assurance that the Telework program will continue on a permanent basis, there is no end date for the reporting requirements. States will remain on a set data collection reporting cycle, with the period beginning October 1 and ending September 30 each year.

The due date for grantees to submit data to RSA is December 31 of each year. No complex analytical techniques are used.

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. See the Paperwork Burden Statement document.

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

There are no exceptions to the certification statement.