SUPPORTING STATEMENT

Vocational Rehabilitation Program

Program Improvement Plan (PIP)

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.

Pursuant to Section 106 of the *Rehabilitation Act of 1973*, as amended, RSA is required to evaluate the performance of state vocational rehabilitation (VR) agencies on established standards and indicators. Federal VR program regulations (34 CFR 361.82 thru 34 CFR 361.86) establish standards and indicators by which RSA measures the performance of the state VR agencies. Evaluation Standard 1 measures employment outcomes using six indicators. To achieve successful performance on Standard 1, a VR agency must meet or exceed the performance levels for at least four of the six indicators. In addition, the agency must meet or exceed the performance level for two of the three primary indicators. An agency that does not achieve the required minimum performance levels for Standard 1 during the fiscal year must submit a program improvement plan (PIP) for RSA approval pursuant to 34 CFR 361.89 (a).

The PIP must contain goals established by the agency, including measurable targets, by which it will assess its progress toward meeting the required minimum performance levels, along with strategies for the achievement of the goals. In accordance with regulations at 34 CFR 361.89(c), RSA reviews an agency's progress toward achieving the goals established in the PIP. For this purpose, it requires that an agency report its progress on a quarterly basis. Should the agency fail to sustain a satisfactory level of performance on Standard 1 for two consecutive fiscal years, RSA will request that the agency modify the PIP to achieve the required level of performance.

As explained in response to Question 3, to promote the consistency of the information contained in the PIPs and the ability of RSA to assess a VR agency's completion of performance improvement goals and strategies therein, as well as to ease the burden on the VR agencies in the development of and reporting on the PIPs, RSA has developed a new form and on-line submission and reporting process through its management information system (MIS). Beginning in FY 2012, each of the VR agencies evaluated during the year that RSA has found to be out of compliance with federal performance standards will use this form located on the RSA MIS to submit a PIP for RSA approval and thereafter to report progress on the goals and strategies contained in the PIP on a quarterly basis, until such time as the agency meets the performance criteria for each indicator of the PIP and the PIP is resolved.

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 PIP must contain goals established by the agency, including measurable targets, by which it will assess its progress toward meeting the required minimum performance levels, along with strategies for the achievement of the goals. In accordance with regulations at 34 CFR 361.89(c), RSA reviews an agency's progress toward achieving the goals established in the PIP. Using this information for each VR agency required to submit a PIP, RSA will be able to track the agency's progress on goals and strategies to improve performance and identify the need for technical assistance to enable it to carry out the strategies.

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.

Currently, RSA does not use an on-line system for the submission of the PIPs and the reporting of progress, though it did provide a Word format template that the agencies which did not meet Standard 1 in FY 2009 could (but were not required to) use to develop their PIPs. At this time, VR agencies report their progress toward the achievement of the goals contained in the PIPs on a quarterly basis through e-mail. Due to the lack of a uniform on-line system, RSA has found it difficult to track the progress of agencies toward meeting the goals established in the PIPs. The on-line system will better enable RSA to carry out this activity. The use of a consistent form and Web-based submission process also will allow the VR agencies to develop and report progress on the PIPs in a more efficient and timely manner, thus reducing the reporting burden they now experience.

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.

An agency that does not achieve the required minimum performance levels for Standard 1 during the fiscal year must submit a program improvement plan (PIP) for RSA approval pursuant to 34 CFR 361.89 (a). The PIP must contain goals established by the agency, including measurable targets, by which it will assess its progress toward meeting the required minimum performance levels, along with strategies for the achievement of the goals. No similar information is available to RSA through other information collections.

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 collection of information does not impact small businesses 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.

In accordance with regulations at 34 CFR 361.89(c), RSA reviews an agency's progress toward achieving the goals established in the PIP. For this purpose, it requires that an agency report its progress on a quarterly basis. Should the agency fail to sustain a satisfactory level of performance on Standard 1 for two consecutive fiscal years, RSA will request that the agency modify the PIP to achieve the required level of performance. Because RSA uses the information contained in the PIPs in preparing its annual report to the President and Congress, current data of agencies on PIPs must be made available each year.

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 require this information collection to be conducted in any manner listed above.

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.

RSA has engaged VR state agency representatives in a field testing process. During the first phase an electronic version of the PIP was made available to participants to enter existing PIPs. RSA will further solicit information via teleconference to gain input on ease of access, user interface, and ideas on improving the user experience. Field testing of the quarterly progress updates will occur during July, 2011. In addition RSA will publish 60-day and 30-day Federal Register notices to allow for comment from others not in the field testing.

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

RSA has made no decision to provide any payment or gift to respondents.

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

There is no assurance of confidentiality, because the collection instrument does not collect individual, personal or sensitive data.

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.

This report contains no 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.

First Year Burden

	PIP Development and MIS Submission	PIP Quarterly Response and MIS Submission	Total Annual Burden
Number of Respondents	5	5	5
Frequency of Response	Initial	Quarterly	
Total Annual Responses	5	15	20
Hours per Response	16	3	18
Total Hours	80	45	125
Cost per Hour	$35.00	$35.00	
Total Cost per Response	$560.00	$105.00	$665.00
Total Cost	$2,800.00	$525.00	$3,325.00

*The number of agencies developing and reporting on a PIP will vary; however, RSA estimates that five VR agencies will be required to develop a PIP each year based on historical performance results on Standard 1. These five respondents will then report for the remaining three quarters of the year, for a total of 15 quarterly responses.

RSA has estimated the time required for each respondent to develop the PIP and complete the form based on field testing of VR agencies. Based on the results from Phase 1 of the field test, in which three agencies participated, RSA found that the PIP can be developed and submitted into the MIS in an average time of 16 hours. In addition, RSA estimates the hourly cost to respondents to be $35.00, and cost per development and submission for the PIP to average $560.00 per respondent. RSA further estimates that the 5 respondents will require a total of 80 hours annually to develop and submit the PIP, for a total annual cost of $2,800.00.

The 5 respondents will report progress on the PIP for the three remaining quarters of the fiscal year, for a total of 45 responses. Based on experience with this process in past years, RSA estimated that each respondent would

require approximately 3 hours to complete and submit each quarterly update in the MIS, for a total of 15 hours over the three quarters. Again, based on an hourly rate of $35.00, RSA calculated the cost to each respondent per quarterly report to be $105.00, for a total annual cost to the 5 respondents over the three quarters of reporting of $525.00. These estimates were confirmed through Phase 2 of the field testing conducted during July 2011.

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.

States and territories incur no additional cost burden when submitting the PIP.

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.

	PIP review and approval	Quarterly progress reports review and approval	Total Annual Cost
Annual cost to the federal government	7.5 hours x $45/ hour = $337.50	11.25 hours x $45/ hour = $506.25	18.75 hours/ $843.75
Annual Federal computer cost			$500
Total cost to Federal Government			$1,343.75

RSA estimates that one GS-13 staff person will require 1.5 hours to review and approve each new PIP submission totaling 7.5 hours of review time (5 x 1.5). RSA estimates that one GS-13 staff person will require .75 hours to review and approve each quarterly PIP submission; totaling 11.25 hours (15 x .75). RSA is now using an hourly cost of $45.00 for each hour of review, based on an hourly rate of staff responsible for this activity. The annual cost burden for review and approval of the PIP and Quarterly Progress reports is estimated to be $1,343.75 and take 18.75 hours.

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

The submission requires no changes to the burden of hours and costs included in the current OMB inventory.

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.

PIPs are not published information.

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.

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. Collection of Information Employing Statistical Methods

The collection of Information does not employ any statistical methods.