

OMB 83-I 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.

Section 13 of the Rehabilitation Act of 1973, as amended (the Act) requires the Commissioner to submit a full and complete Annual Report to the President and Congress within 180 days after a fiscal year (FY) on the activities carried out under the Act. This Annual Report should include statistical data reflecting services and activities provided to individuals during the preceding FY. The Rehabilitation Services Administration (RSA) RSA-113 fulfills a major role in helping the Commissioner comply with the Annual Report requirement by providing timely data on the overall dimensions of the state vocational rehabilitation (VR) program.

The RSA-113 data are submitted quarterly by State vocational rehabilitation (VR) agencies. VR agencies that administer vocational rehabilitation programs provide key caseload data on this form, including numbers of persons who are applicants, determined eligible/ineligible, waiting for services, and their program outcomes. This data is used for program planning, management, budgeting and general statistical purposes.

Due to additional workloads involved in the new monitoring cycle which ended in FY 2010, we were unable to complete a draft revised RSA-113. We anticipated submitting a final version in the winter of 2011 and clearance expected in July 2012. Following forms clearance, State agencies will need time to reprogram their data collection systems and conduct systems testing.

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 Commissioner will use RSA-113 data for the purposes listed in response to Question 1. The RSA-113 data are also used to determine trends in the acceptance

and rehabilitation of applicants for rehabilitation services. These data have been used for the generation of outcome measures permitting assessment of state agency productivity. The outcome measures, in turn, form the basis for monitoring and the timely delivery of technical assistance to state agencies, when warranted. In addition, RSA-113 data are employed in the budget development process and are frequently requested by the Office of Management and Budget (OMB), the Secretary and Assistant Secretary, and by the Congress and its staff.

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.

RSA has a Management Information System that agencies use to access the data collection directly through the internet by using the following URL: <http://rsamis.ed.gov>. Approximately 95 % of state VR agencies submit their data in this manner.

While most respondents have the facility to submit their data electronically, there are a few respondents that prefer the option of submitting their data by hard copy. Some state VR agencies also submit their data by mail, by fax, and/or by email. If online submission is not possible, the form may be emailed to Vernita.Washington@ed.gov, faxed to 202-245-7593, or mailed to:

U.S. Department of Education
State Monitoring and Program Improvement Division
Data Collection and Analysis Unit
Attention: Vernita Washington, PCP 5047
550 12th Street, S.W.
Washington, D.C. 20202-2550

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 information requested on the RSA-113 represents a portion of greater caseload detail already available in state rehabilitation agencies. The agencies, therefore, have only to extract a limited amount of caseload flow data from their own on-going data collection systems when preparing the RSA-113. The RSA-113 is the only RSA report dealing with current and total state agency caseload flows. No similar

information is available from other sources.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Respondents are agencies of state governments only. There is no impact on 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.

RSA-113 data are to be collected quarterly. These data provide current perspectives and insights into caseload trends in individual state agencies that permit early detection of questionable and undesirable trends (e.g., reductions in the number of persons with significant disabilities entering the caseloads, declines in acceptance rates and rehabilitation rates, increasing backlogs of eligible individuals who cannot be served, etc.). Using quarterly RSA-113 data, RSA staff can perform their oversight functions more knowledgeably in their continuing contacts with state agencies and provide expeditious technical assistance, when needed. Without quarterly data, their monitoring and technical assistance functions will be seriously limited. Further, the availability of quarterly data permits informed judgments about trends to be made for use in the budget development and preparation process.

7. Explain any special circumstance that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**

There are no circumstances that require respondents to report information 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;**

This collection has been in effect for several years and collects information that the respondents maintain continuously. There are no circumstances that require a written response in fewer than 30 days after receipt.

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

Respondents are required to submit one copy to RSA in Washington, DC.

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

Respondents are not required to retain records for more than three years.

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

This collection is not a statistical survey.

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

This collection is 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

The RSA-113 is an aggregated report form of caseloads and does not identify individual information.

- **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 RSA-113 report does not require proprietary trade secrets of 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.

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 regularly contacts the Council of State Administrators of Vocational Rehabilitation (CSAVR) on developments affecting the RSA-113. CSAVR is an umbrella organization, headquartered in suburban Washington, DC, representing the 80 respondents (state VR agencies).

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

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

There are no payments or gifts to respondents.

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

The RSA-113 is an aggregated report form of caseloads and does not identify individual information. There are no assurances of confidentiality provided 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. This 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.

Data collected on the RSA-113 is not 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 13 of OMB Form 83-I.
- 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.

Estimates of reporting burdens are based on the experience of many years of caseload data collection as well as discussions with respondent representatives. Estimates for reporting indicate minimal burden because the data called for by the RSA-113 are limited in scope and are maintained by respondents for their own needs and use.

Some states have a separate agency for the blind and visually impaired, while other states have a single state agency. Currently 80 agencies are required to respond to the RSA-113.

Estimated time to edit, collect and submit summary data on the RSA-113 Report – 1 hour and number of respondents - 80

Number of quarterly collections from each respondent annually – 4

Total number of responses annually – 320

Annual cost to respondents: 320 burden hours X \$20/hour = \$6,400

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.

This collection does not require capital cost, start-up costs, maintenance costs or the purchase of services for the respondents. The summary data required is already maintained for the purpose of maintaining its federal grant. There are no additional costs for this RSA-113 report.

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.

Annualized Estimated Federal Cost:

Annual Federal Costs		
50 hours X \$25 per hour	\$	3,750
Annual federal computer costs:	\$	<u>500</u>
	\$	4,250

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no program changes or adjustments associated with this request.

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-113 data are due 30 days after the first three quarters of the FY, and 60 days after the fourth quarter, or end of the FY. By the middle to the end of the succeeding month, reports for all state rehabilitation agencies will be collected, edited, revised if necessary, and tabulated. The tabulation comprises eight tables of data displaying all RSA-113 data for state agencies. The tables contain a variety of analytical measures and comparisons such as percent distributions, percent changes from previous year, percent of caseload composed of significantly disabled persons, acceptance rates and rehabilitation rates. They are also shown by type of agency (general/combined and agency for the blind).

Data for the fourth quarter represent annual totals that are published as "Caseload Statistics" on RSA's website early in the succeeding calendar year. The annual totals are also made available, along with an accompanying analysis, for the Annual Report to the Congress required by Section 13 of the Rehabilitation Act.

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.

The expiration date for OMB approval will be displayed.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions to the certification statement identified in Item 20 of OMB Form 83-1.