

**U.S. DEPARTMENT OF EDUCATION  
REHABILITATION SERVICES ADMINISTRATION (RSA)**

**EVALUATION OF STATE VOCATIONAL REHABILITATION  
AGENCY ADMINISTRATION OF SUPPORTED EMPLOYMENT  
SERVICES PROGRAMS**

**Office of Management and Budget  
Clearance Package Supporting Statement for Paperwork  
Reduction Act Submissions**

**Part A  
Justification**

## Table of Contents (Part A)

### INTRODUCTION 1

A.	Justification	7
A.1	Circumstances Making the Collection of Information Necessary	7
A.2	Purpose and Uses of the Collection Information.	8
A.3	Use of Technology to Reduce Burden.	10
A.4	Efforts to Identify Duplication	11
A.5	Methods to Minimize Burden.	12
A.6	Consequences of Not Collecting Data	12
A.7	Special Circumstances	12
A.8	<i>Federal Register</i> Comments and Persons Consulted Outside the Agency	13
A.9.	Decision to Provide Any Payments or Gifts to Respondents, Other Than Remuneration of Contractors or Grantees.	14
A.10	Assurance of Confidentiality.	14
A.11	Justification for Any Questions of a Sensitive Nature	15
A.12	Estimates of the Hour Burden:	16
A.13	Estimate for the Total Annual Cost Burden to Respondents	17
A.14	Estimates of Annual Costs to the Federal Government.	18
A.15	Reasons for any Program Changes or Adjustments.	19
A.16	Plans for Tabulation and Publication of Results, Analytic Techniques, and Time Schedule	19
A.17	Approval to not Display the OMB Expiration Date.	24
A.18	Explanation of Exceptions.	24

## **List of Figures**

Figure 1-1: Flow Diagram of the VR SE Process 3

## **List of Tables**

Table 1. Estimates of information collection burden 19

Table 2. Distribution of costs 18

Table 3. Anticipated schedule Error: Reference source not found

U.S. DEPARTMENT OF EDUCATION  
REHABILITATION SERVICES ADMINISTRATION

EVALUATION OF STATE VOCATIONAL REHABILITATION AGENCY  
ADMINISTRATION OF SUPPORTED EMPLOYMENT PROGRAMS

INTRODUCTION

Pursuant to section 14 of the *Rehabilitation Act of 1973* (as amended), the Rehabilitation Services Administration (RSA) plans to conduct a survey (with limited telephone follow-up) of state vocational rehabilitation (VR) agency supported employment practices. The Supported Employment (SE) Grant Program assists States through Title VI, Part B, of the *Rehabilitation Act* to develop and implement collaborative programs with appropriate entities to provide SE services for individuals with the most significant disabilities who require these services to achieve employment outcomes. Title I funds are used to supplement Title VI-B for SE programs. Title VI-B funds cannot be used to provide extended services that are necessary to maintain individuals in employment after VR support has terminated.

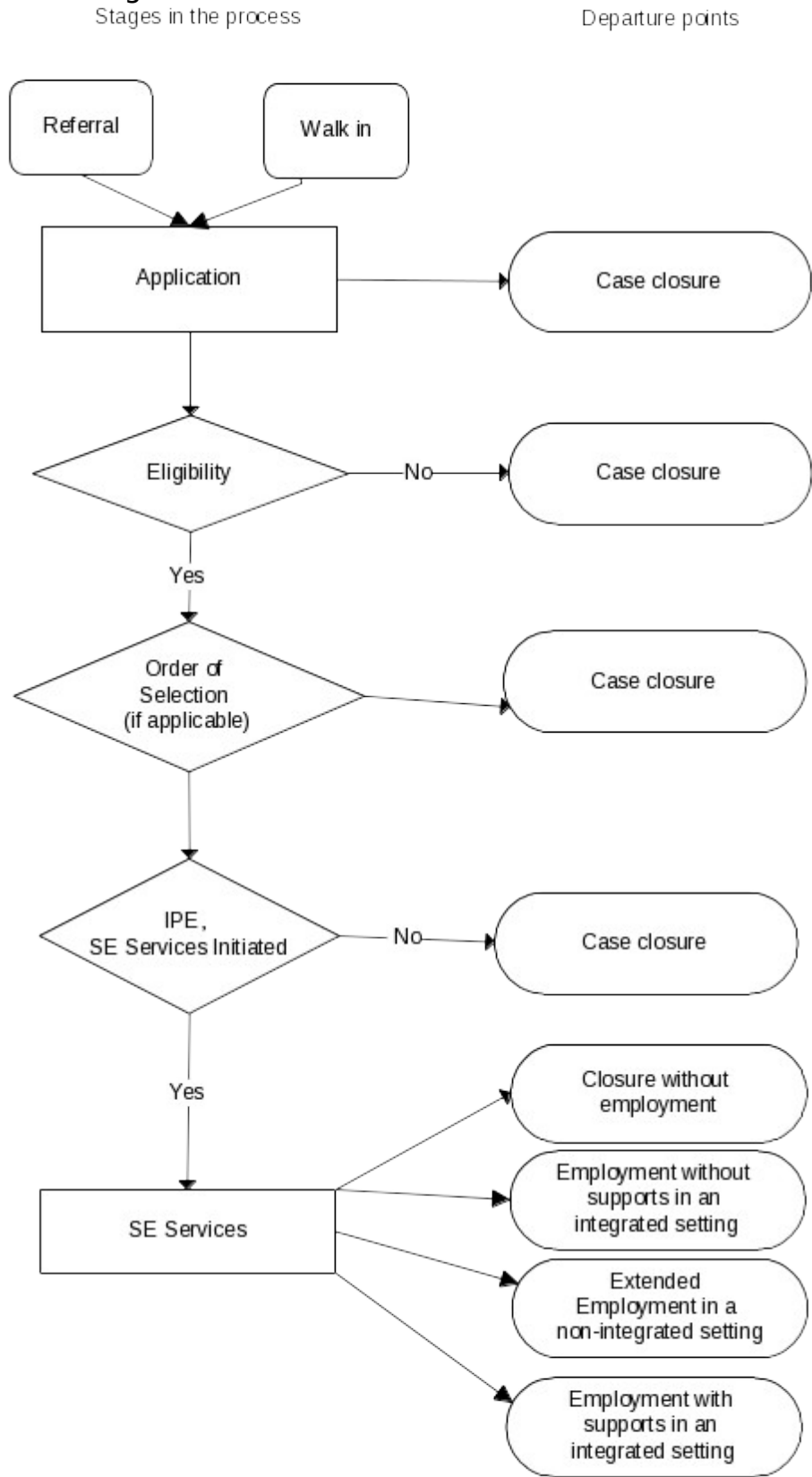
The purpose of this data collection is to inquire of all 80 State VR agencies the manner in which they implement SE services, how they use Title VI Part B funds in conjunction with Title I funds to fund SE, the level of performance in achieving SE outcomes, whether VR agencies obtain SE outcomes for their consumers, and also seek to understand the factors that explain successful SE outcomes. It is designed to complement other studies that examine SE supports beyond the time-limited support provided through the VR program.

The VR Program provides a wide range of services to help individuals with disabilities prepare for and engage in gainful employment. Eligible individuals are those who have a physical or mental impairment that results

in a substantial impediment to employment, who can benefit from VR services for employment, and who require VR services. If a State is unable to serve all eligible individuals, priority must be given to serving individuals with the most significant disabilities. The program is funded through formula-based grants from RSA to State agencies and is administered under approved State plans by VR agencies. State VR agencies receive funding from the Title I formula grant program.

Figure 1 presents the path individuals seeking or referred for SE generally follow in the VR system. Individuals might be referred by an organization or agency for VR services and specifically for SE. Others might seek VR services on their own. Individuals who receive SE services will experience one of four possible results 1) employment without supports in an integrated setting, 2) employment with supports in an integrated setting, 3) extended employment in a non-integrated setting, and 4) closure without an employment outcome. (RSA only recognizes employment outcomes with supports as an SE on the RSA-911 (1820-0508).

Figure 1-1: Flow Diagram of the VR SE Process



Limited information is available about how State VR agencies serve individuals who have a goal of SE or how State VR agencies use Title VI Part B funds from the SE State Grants Program in conjunction with Title I funds to pay for services provided to individuals with disabilities. Moreover, the reviews of the state plans and monitoring reports reveal that the extent to which State VR agencies achieve SE outcomes for individuals with disabilities is uneven. This variability stems in part from differences in policies, practices, and resources that States and State agencies have with regard to SE.

A review of literature provides very little information about variances across agencies with respect to SE outcomes. Two studies that examined community mental health programs<sup>1</sup> found that in certain instances, public-private partnerships can increase access to SE. Cook and O'Day (2006),<sup>2</sup> who reported on a demonstration study, found that, among other things, improved employment outcomes were tied to the number of vocational services received by participants. A study of 26 mental health agencies found that differences in access to SE services varied and was related to the number of SE specialists per individual (Becker et al., 2006).<sup>3</sup> This study also found that other factors, including implementation of critical components and external factors such as the employment rate, affected SE outcomes.

---

<sup>1</sup> Becker, D., Lynde, D., & Swanson, S. (2008 April). Strategies for state-wide implementation of supported employment: The Johnson & Johnson - Dartmouth Community Mental Health Program. *Psychiatric Research Journal*, 31(4): 296-299; Drake, R., Becker, D., Goldman, H., & Martinez, R. (2006 March). Disseminating evidence-based practices: The Johnson & Johnson - Dartmouth Community Mental Health Program. *Psychiatric Services*, 57(3): 302-304.

<sup>2</sup> Cook, J., & O'Day, B. (2006 September). *Supported employment: A best practice for people with psychiatric disabilities*. New York: Cornell University, Rehabilitation Research and Training Center on Employment Policy for People with Disabilities.

<sup>3</sup> Becker, D., Xie, H., McHugo, G., Halliday, J., & Martinez, R., (2006 June). What predicts supported employment program outcomes? *Community Mental Health Journal*, 42(3): 303-313.

Rogan et al. (2002) reported that there is little cohesion across States regarding the delivery of SE services and that SE services are subject to various issues, including State policies that can affect how States are able to provide SE services and extended services.<sup>4</sup> West et al. (1997) examined the use of natural supports in SE in a survey of 385 SE provider agencies.<sup>5</sup> They found that 85 percent of agencies used natural supports, which most frequently included support from coworkers, family, and friends. However, two-thirds of agencies indicated that they experienced problems implementing natural supports, including hesitation on the part of employers and coworkers and an insufficient number of employers able to provide natural supports. A major obstacle to assessing the effectiveness of natural supports for individuals with a goal of SE is that there is no consensus on what constitutes natural supports.

The successful implementation of SE appears to depend at least in part on whether organizational structures support the evidence-based practices of SE. Bond et al. (2007) found that SE programs administered by community mental health centers (CMHCs) had higher fidelity than those provided by other types of organizations, including psychosocial or comprehensive rehabilitation centers.<sup>6</sup> The authors attributed the lower implementation of SE by comprehensive rehabilitation centers to an emphasis on an individualized and rapid job search, as well as to funding restrictions that discourage choice and discourage the reopening of cases after job losses.

---

<sup>4</sup> Rogan, P., Novak, J., Mank, D., & Martin, R. (2002). From values to practice: State level implementation of supported employment. *Journal of Vocational Rehabilitation*, 17(1): 47-57.

<sup>5</sup> West, M., Kregel, J., Hernandez, A., & Hock, T. (1997). *Everybody's doing it: A national survey of the use of natural supports in supported employment*. Retrieved January 15, 2010, from <http://www.worksupport.com/research/viewContent.cfm/407>

<sup>6</sup> Bond, G., Campbell, K., Bond, G., Gervy, R., Pascaris, A., Tice, S., et al. (2007). Does type of provider organization affect fidelity to evidence-based supported employment?. *Journal of Vocational Rehabilitation*, 27(1): 3-11. Retrieved from [Worksupport.com](http://www.worksupport.com).



The results of one longitudinal study by Tashjian and Schmidt-Davis (2000)<sup>7</sup> provide some information on the characteristics, services, and outcomes of this population. The analysis did not include the SE goal because SE was rarely identified as a goal in the rehabilitation plans that were reviewed. They found that most individuals entered VR with some prior work experience. Compared to individuals with significant disabilities who were not receiving SE, SE consumers on average were younger, three times as likely to have received special education services, twice as likely to have been referred to VR by an educational institution, and also more likely to have received financial assistance at entrance to VR. In terms of extended services after VR support has ended, job coaching, counseling, off-site monitoring, and job-skill training were services most frequently received by these individuals. One year after exit from the VR program, 84 percent were still working, and 74 percent were in the same job. They were less likely to receive health insurance and other job-related benefits than other employed individuals with significant disabilities who received SE services in the past.

Cimera (2007)<sup>8</sup> looked at the cost-effectiveness of SE. He examined the RSA 911 Case Service Report data in order to estimate the cost of SE services and to identify methods RSA might use to more closely track VR spending on SE services. In both instances, the study found that the data do not provide sufficient information to allow for a detailed accounting of SE spending. The report also examined methods of determining the cost-effectiveness of different approaches to funding and delivering SE services. However, the report did not distinguish between Title I funds and Title VI Part B funds.

---

<sup>7</sup> Tashjian, M., & Schmidt-Davis, H. (April 2000). *Vocational rehabilitation experiences among individuals who achieved a supported employment outcome*. Research Triangle Park, NC: Research Triangle Institute.

<sup>8</sup> Cimera, R.E. (October 2007). *Cost of providing services: How RSA could evaluate supported employment*. Kent State University Kent, OH. Submitted to Rehabilitation Services Administration, U.S. Department of Education.

As the foregoing discussion indicates, concentrating services and providing strong supports increase the likelihood of a successful SE outcome. However, literature also suggests that most of what is known about SE is incidental and derived from controlled or otherwise unique situations. Because the available information on how VR agencies use both Title I funds and Title VI Part B funds to provide SE services is sparse, it is imperative that RSA conduct this survey and telephone follow-up in order to gain a better understanding of the issues.

## A. Justification

**A.1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.**

RSA in the Office of Special Education and Rehabilitative Services (OSERS), Department of Education, oversees formula and discretionary grant programs that help individuals with physical or mental disabilities to obtain employment and live more independently through the provision of such supports as counseling, medical and psychological services, job training, and other individualized services and social supports.

RSA conducts evaluations of the Title I program with authorization under **Section 14(a)** of the *Rehabilitation Act* (P.L. 93-112; P.L. 105-220), which states:

For the purpose of improving program management and effectiveness, the Secretary, in consultation with the Commissioner, shall evaluate all the programs authorized by this Act, their general effectiveness in relation to their cost, their impact on related programs, and their structure and mechanisms for delivery of services, using appropriate methodology and evaluative research designs.

Through this new, one time survey with telephone follow-up, RSA hopes to gain a better understanding of how the 80 State VR agencies implement SE services, how they use Title VI Part B funds in conjunction with Title I funds to fund SE, the level of performance in achieving SE outcomes, whether VR agencies obtain SE outcomes for individuals with disabilities, and to more accurately identify the factors that explain successful SE outcomes. This survey explores state VR agency supported employment practices, delivery methods and time-limited supports provided prior to case closure. This information will complement other studies that examine SE supports beyond the time-limited VR supports.

**A.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.**

This is a new, one-time collection. The primary audiences for the information are RSA, OSERS, the Office of Management and Budget (OMB), Department of Education Budget Service Office, and the State VR agencies. The information will be used for program evaluation and ongoing program improvement by RSA, including the development of training programs, improvement of the long-term meaningful employment of individuals with the most significant disabilities who need comprehensive and long term support to obtain and maintain employment and their use of SE.

The findings are intended to contribute to Federal and State agency knowledge of successful and meaningful employment strategies, how all 80 State VR agencies implement SE services for the individuals they serve, how they use Title VI Part B funds in conjunction with Title I funds to fund SE, and whether VR agencies obtain SE outcomes for the individuals they serve. The study also seeks to understand the factors that explain successful SE

outcomes. The findings may have policy implications for the State VR agencies.

This study is designed to provide information on several distinct lines of inquiry about SE:

- What are agency practices in providing SE services?
- How do agencies use Title VI-B, Title I, and other funds to provide SE?
- What are the employment outcomes for individuals receiving SE services?

The study will address the following specific research questions:

#### WHAT ARE AGENCY PRACTICES IN PROVIDING SE SERVICES?

- What are the services provided to individuals who have a goal of SE and/or obtain an SE outcome?
- How do counselors determine that SE is the most appropriate outcome for an individual with a most significant disability?
- What guidelines do VR agencies generally use to select SE providers?
- How do state VR agencies determine there is a reasonable expectation that extended services will be available?
- Why do some individuals receiving SE services change from SE goals to non-SE goals? How many individuals receiving SE services change from SE goals to non-SE goals?
- How do agencies determine if natural supports are appropriate for the individual being served?
- How do agencies oversee the administration of natural supports?
- What standards, policies, and procedures guide VR agencies in arranging for extended supports to individuals in their place of employment?

## HOW DO AGENCIES USE TITLE VI-B, TITLE I, AND OTHER FUNDS TO PROVIDE SE?

- How do VR agencies use and account for Title VI Part B SE funds?
- What are the patterns of spending for Title I and Title VI part B funds for individuals receiving SE services?
- What are the State and local funding sources for extended services?

## WHAT ARE THE OUTCOMES FOR INDIVIDUALS RECEIVING SE SERVICES?

- What are the employment outcomes for individuals with a goal of SE for each major disability category served?

See Appendix A for the draft questionnaire. Answers to these evaluation questions will provide OSERS, RSA, the Office of Budget Service, and the Office of Management and Budget information on the policies and procedures of State VR agencies to implement the SE program and the use of Title VI Part B funds.

### **A.3 Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The RSA contractor will develop and conduct an electronic survey of all 80 VR agencies using web-based technology. RSA feels it is necessary to survey all 80 VR agencies to get a comprehensive picture of how agencies use Title VI Part B funds in conjunction with Title I funds to provide SE services. This methodology will reduce the burden by allowing respondents easy access and submission of an automated survey instrument.

The RSA contractor has taken necessary means in planning this data collection activity to reduce the burden on interview subjects. These are described below. RSA will first send an electronic notice to all VR agencies informing them of the forthcoming data collection and of the importance of this data collection. This e-mail will include a description of the purpose of the evaluation and how information will be used and will be signed by the RSA Commissioner. See Appendix B for the draft e-mail to be sent by RSA. Following this message, the contractor will send an e-mail to the VR agency directors requesting the name and contact information of a staff member at the agency to serve as the main point of contact between the agency and the contractor (see Appendix C). Once the agency identifies the staff member, the contractor will provide him/her with information on how to enter the survey webpage and establish a user name (see Appendix D). A second e-mail will provide the password to access the survey (see Appendix E). Each agency will receive a unique user name and password.

After the survey data are collected, the contractor will identify three VR agencies from among the respondents for follow up to explore more deeply the activities related to SE. Selection of the three agencies will be based on survey results that indicate strong or promising SE practices. The contractor will contact these three agencies for in-depth discussions with State VR agency staff about their SE policies, procedures, and use of Title I and VI Part B funds for SE.

The contractor will prepare interview protocols based on what is learned from the survey. Further exploration through discussions will provide more detail and understanding. The protocols will be tailored to address specific issues or topics relevant to each State agency that will be interviewed. The protocols will be structured as discussion guides to explore the particular topics and issues. The topics and issues will be identified primarily through a review of agency survey results.

The RSA contractor will work with the State VR agency directors to identify staff with knowledge of and experience with the SE Program for the interviews. During the discussions, the contractor may request access to relevant documents and data that might provide further information about program administration.

**A.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.**

There is no alternative source of information on how VR agencies use Title VI Part B funds in conjunction with Title I funds for SE, how they implement SE services for the individuals they serve, nor how they and whether States' VR agencies obtain SE outcomes for the individuals they serve. Nor does information currently available explain successful SE outcomes. RSA's existing data collection forms do not specifically collect this information. This is a one-time study that will provide RSA an opportunity to gather information about the operation of SE projects, including policies and procedures and the use of Title VI Part B funds.

The contractor analyzed the RSA-911 (OMB Control 1820-0508) and RSA-2 (OMB Control 1820-0017) data to examine the strengths and limitations of existing administrative data and found that the RSA-911 data provide rich information on individuals receiving SE services, including their characteristics and statuses at application and their outcomes following VR. The data also help provide insight into the factors associated with achieving an SE outcome among individuals receiving SE services. However, the RSA-911 and RSA-2 do not collect data on how States administer the SE program, including the use of Title VI Part B funds. In addition, RSA-2 data do not



provide information on specific services for which Title VI Part B funds were spent. Other shortcomings include:

- If an individual receiving SE services changes from a non SE goal to an SE goal, the RSA-911 element pertaining to SE status might not be updated to reflect this change.
- The administrative data do not provide information about the use of natural supports as a source of extended services for the individuals they serve achieving an SE outcome, nor about the funding, providers, and monitoring of such services.

In general, the administrative data are weak regarding the application of SE services and specifically how Title VI Part B funds influence SE outcomes. The contractor's review of State VR plans reveals little information about agency SE policies and practices.

**A.5 If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

The collection of information does not impact small business.

**A.6 Describe the consequence 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 data collection is not conducted, RSA will not obtain needed information about the operation of the SE program, including information about policies and procedures and use of Title VI B funds. This will restrict RSA's ability to improve program management and effectiveness.

**A.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 that 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.**

None of the special circumstances listed apply to this data collection. There are no special circumstances that would cause this information collection to be conducted in any manner listed above. This collection of information complies with the requirements of 5 CFR 1320.5.

**A.8 As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.**

A 60-day and 30 day notice was published in the *Federal Register* for public comment in February and April 2012.

As part of the survey development, the RSA contractor consulted with RSA staff members who have state VR agency experience and are very familiar with the services provided for SE for individuals with the most significant disabilities. The contractor also sought and received feedback from the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Council of State Agencies for the Blind (NCSAB) regarding the appropriateness of the survey questions. Based on comments received from these consultations, the contractor has modified the questions in the survey to assist with ease of reporting.

**A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

The respondents will not be given any payments for responding to the survey.

**A10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.**

There are no assurances of confidentiality. No personally identifiable information will be gathered by this collection. The survey of state VR agencies collects only aggregate-level data; individuals who are applicants or eligible for services at VR agencies will not be identified. In addition, the survey collects information about VR agencies, not the individuals responding to the survey on behalf of the agencies. Therefore, there is no need for a statement of confidentiality. Respondents are included as a direct result of their professional roles and responsibilities.

**A11. 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 obtain their consent.**

There are no questions of a sensitive nature, including any about sexual behavior or attitude or religious beliefs or other matters commonly considered private. There are no questions specific to the individual respondents. The survey asks about VR agency's policies, practices, use of funds, and outcomes.

All respondents will receive information about the study, including information about the voluntary nature of their participation and the confidentiality of their responses. They will be told that they can refuse to answer a question if they do not want to answer it.

**A12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector - businesses or other for-profit, private sector - not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours).**
- **Provide estimates of annualized cost to respondents for 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.**

Table 1 includes an estimate of the burden for the respondents to respond to the survey instrument. Since this is a one-time survey, the total burden for survey data collection is estimated to be 240 hours. However, the contractor will follow up by telephone with up to three agencies to explore more fully how they administer their SE programs. Selection will be based on the perceived ability of an agency to provide such details and survey responses regarding program administration. The estimated time burden is derived in part from feedback received by CSAVR and NCSAB and from RSA staff members who have state VR agency experience. The estimate is based on 80 potential respondents taking three hours to complete the survey.

The total burden to complete the on-line survey with limited telephone follow-up is estimated to be 249 hours. The estimate of time anticipated for the follow up telephone interviews with three agencies is 9 hours: three hours per agency, approximately one hour per person and up to three people per agency (180 minutes x 3 agencies = 540 minutes).

Table 1. Estimates of information collection burden

<b>Instrument/Path</b>	<b>Completi ons</b>	<b>Minut es</b>	<b>Hour s</b>	<b>Estimate d Hourly Cost to Responde nts</b>	<b>Estimated Total Cost to Responde nts</b>
State VR agency staff— Web survey and interviews	80 agencies	14,940	249	\$35	\$8,715

**A13. 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 purchasing or contracting out information collections 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

Total Annualized Capital/Startup Cost: 0

Total Annual Costs (O&M) : 0

Total Annual Costs Requested : 0

There are no additional costs beyond the burden identified in A12.

**A14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The estimated total cost to the Federal Government associated with this data collection is \$278,361. This cost represents the value of contractor services over a period of 21 months to perform all activities associated with the proposed data collection. The annualized cost per year is \$180,000 in the first year and \$98,361 in the second year.

Included are costs for all expenses to be incurred that are associated with the proposed data collection. These include:



- Analysis of RSA 911 and RSA 2 data and State VR plans
- Development of survey instrument and testing of the survey instrument
- Data collection - all aspects
- Analysis and reporting
- Data security
- Establishment and maintenance of website.

These costs are derived from the contractor budget. The expense categories are shown in Table 2.

Table 2. Distribution of costs.

<b>Expense Categories</b>	<b>Cost to the Federal Government</b>
Labor	\$78,913
Subcontractor	\$98,548
Other direct costs	\$4,910
Overhead, G&A, and fee	\$126,578
<b>TOTAL</b>	<b>\$308,948</b>

**A15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

This is a new collection. Therefore, the entire burden is new.

**A16. 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.**

A draft and final evaluation report will be produced based on the web survey completed by State VR agencies as well as agency interviews and analysis of RSA administrative data. In addition, Westat will develop draft and final briefing reports, and project data files.

**The following is the proposed outline for the Final Evaluation Report:**

Executive Summary

1. Introduction
2. Agency practices in implementing Supported Employment
3. State agency patterns of use of Title VI Part B funds for Supported Employment
4. Supported Employment outcomes
5. Recommendations for policy and further research

Appendix: Methodology and data sources.

The contractor will disseminate information about the findings of the study during the course of the study through presentations to ED staff, professional conferences (such as on disability and rehabilitation research or public policy and management), and practitioner conferences (such as for CSAVR and NCSAB).

**Analytical Techniques**

The contractor staff will download VR agency survey data into a secure database and produce descriptive statistics for each survey item, including measures of frequency and central tendency, as appropriate. The contractor will also perform cross-tabulations to detect patterns by size of agency, size of the total population served, number of staff who work with individuals who receive SE, and other factors regarding coordination with and use of VR services by individuals receiving SE services.

Open-ended items will be downloaded into Microsoft Word for sorting and coded into meaningful categories.

Preliminary analytic results will be used to draw a purposive sample of three VR agencies to participate in more detailed interviews to examine State VR agency policies and practices as described earlier. Reports will be produced within two weeks of the agency interviews.

**A17. 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 will be displayed as required on the survey form.

**A18. Explain each exception to the certification statement identified in the Certification for Paperwork Reduction Act.**

There are no exceptions to the certification statement.