

Supporting Statement for Paperwork Reduction Act Submission

Part A

**Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID)
Evaluation System**

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The U.S. Department of Education (ED) is requesting Office of Management and Budget (OMB) clearance for the Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) Evaluation System. This system will be used to evaluate the implementation and outcomes of the five-year Transition Programs for Students with Intellectual Disabilities (TPSIDs) model demonstration projects. This evaluation is being conducted by the Institute for Community Inclusion, University of Massachusetts Boston, under contract with ED (contract number P407B100002).

The main objectives of this project are: (1) Establishment of a uniform dataset for collection of required program data from 27 TPSID demonstration project grantees and their partner sites across the country; (2) use of the program data for a national evaluation of the TPSID program.

This request seeks clearance for establishment of a uniform dataset across all TPSID sites (including both grantees and partner sites) to ensure consistency in collection of information.

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 Higher Education Opportunities Act (HEOA) Amendments of 2008 (20 USC 1140f-1140i; see Appendix A) called for creation of model demonstration projects supporting access into higher education for students with intellectual disabilities (ID).

In October 2010, the Department of Education, Office of Postsecondary Education (OPE) awarded 27 institutes of higher education (IHE) grants to fund the creation of Transition Programs for Students with Intellectual Disabilities (TPSIDs) (model demonstrations) in 23 states. The Department of Education grant applications for TPSID grantees under CFDA #: 84.407A indicated:

...that in accordance with Section 767(d)(5) of the HEA, grantees would be required to participate in evaluation activities conducted by the coordinating center established by section 777(b) of the HEA. As part of these reports and evaluation activities, grantees will be expected to work closely with the coordinating center to develop performance measures most closely aligned with activities that promote the successful transition of students with disabilities into higher education (page 37).

It further stated that TPSID grantees would be asked to annually collect and provide 11 GPRA performance measures to the Coordinating Center.

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 Office of Postsecondary Education TPSID Program awarded one (1) Model Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities Coordinating Center (TPSIDCC) to build a valid and reliable knowledge base around program components.

The TPSIDCC will establish of uniform dataset across all TPSID sites (including both grantees and partner sites) to ensure consistency in collection of information comprised by the 11 required GPRA measures. To coordinate the data collection, the Coordinating Center intends to collect these program data at the institution from TPSID and partner site program staff via an online, secure, data management system.

The TPSIDCC is also charged with conducting an evaluation of the 27 TPSID programs. The Coordinating Center's evaluation effort intends to address the following evaluation questions:

1. What academic, independent living, career development, and social opportunities are TPSIDs providing to participants enrolled in their programs?
2. What are the outcomes for participants who attend TPSID programs?
3. How do participants' outcomes in TPSIDs vary based on program characteristics?
4. How have the TPSIDs' activities changed over the project period?
5. What kinds of internal and external collaboration activities are staff from TPSIDs conducting?
6. What activities do TPSIDs conduct with the families?
7. What existing campus resources/ college systems do students (aggregate data) served by TPSIDs use?
8. What type of credential is each TPSID offering and how are TPSIDs tracking progress towards this credential?
9. What kinds of evaluation activities are the TPSIDs conducting?
10. What funding mechanisms are being used by TPSIDs and students (aggregate data)?
11. What vehicles are the TPSIDs using to enhance sustainability?

To this end, each year after the July 31 deadline, Coordinating Center staff will summarize the evaluation data provided for the preceding year; all data will also be summarized at the conclusion of the five-year project. Data analysis will take place using SPSS and will consist primarily of descriptive and frequency analyses.

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.

All data will be collected in a secure online database that was created using software purchased from Intuit Quickbase (quickbase.intuit.com). All data entry, tracking, and retrieval will be

electronic. A web-based data collection system was determined to be the best approach for several reasons:

1. This system allows TPSIDs and their partners to fill in data as they become available from any computer with Internet access.
2. Given the longitudinal nature of the project, a web-based evaluation system reduces burden by allowing TPSID and partner site staff to review the previous year's data and make updates as needed, rather than entering a full set of annual data without reference to previous entries.
3. Intuit Quickbase, which supports a relational database platform, reduces respondent burden by storing data that will need to be called on by TPSIDs for multiple records rather than requiring them to continuously enter similar information into many records.
4. This system facilitates the use of nested levels of analysis (i.e. each TPSID and associated partner program).
5. This system provides a secure mechanism for transmittal of data.
6. The system is available for TPSIDs to both enter and retrieve data on their programs, allowing them to use this system to facilitate other reporting requirement such as their Annual Performance Reports.

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.

In order to obtain funding each year from the Office of Postsecondary Education, each TPSID must provide these data. The role of the proposed data collection system is to standardize the data collection process to make it more efficient and useful both to the TPSIDs and to the OPE. Moreover, the system was designed to facilitate collection, storage, and retrieval of data in support of TPSIDs' required Annual Performance Reports to the Department of Education.

Since this grant program is new, comparable information on these programs is not available from any other source. We did investigate other data sources and do plan to gather a considerable portion of background information on the IHEs (program demographics) from the Integrated Postsecondary Education Data System (IPEDS; <http://nces.ed.gov/ipeds/>). However as these programs are very new and serve a very small sample of students (some as few as 3-5 students) the existing systems have not included these types of programs in their current data collection efforts. As a result there is a paucity of descriptive information on this type of program. Finally, we took great pains during instrument development to avoid replication; for example, no question is asked if the data can be found from another source.

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.

No small businesses are involved in this effort; only institutes of higher education will be entering data in the system.

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.

The goal of OPE's TPSID Program is to promote the successful transition of students with intellectual disabilities into higher education and to enable institutions of higher education (or consortia of institutions of higher education) to create or expand high quality, inclusive model comprehensive transition and postsecondary programs for students with intellectual disabilities.

Without this consistent, centralized data collection system, OPE would not be able to identify the characteristics and attributes of these emerging postsecondary education programs or of this new population of college student who have not previously been served in higher education. Program statute also requires this data collection.

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 involved with this data collection effort.

8. 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.

A 60 day and 30 day notice was published in the Federal Register for public comment. No public comments were received regarding the level of cost or burden required by this collection. The Department of Education has consulted with persons outside the agency in the development of this data collection system. We also consulted with Tom Weko and Jessica Shedd at the National Center for Education Statistics and David Bergeron from OPE regarding the best way to address concerns expressed by OMB related to data availability and burden.

A draft version of the program data collection instrument was sent to all of the TPSIDs' Principal Investigators in February 2011. Respondents were asked to review the data elements and provide feedback both on individual questions and on the instrument as a whole. Nineteen of the twenty-seven TPSIDs provided feedback on the Program tool. The extensive comments received were reviewed in detail by project staff in March 2011 and changes to the system were made based on that feedback.

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

No payments or gifts are being made to respondents.

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

All data will be collected at the program level. The system will provide a template for program staff to use, if desired, to gather data on enrollees to be aggregated and reported at the program level. Only approved TPSID model demonstration project staff and partner site staff (as assigned by the TPSID Principal Investigator) will have access to the system.

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 of a sensitive nature are included.

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

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 16 of IC Data Part 1.*
- *Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.*

A total of 56 IHEs (the 27 TPSID grantees plus 29 partner sites) will be required to enter data in the system annually.

Since the time required to enter data in the system is heavily dependent on the size of the program, the time required will vary considerably from school to school. Based on our pilot testing experience to date, we expect a TPSID program to need 2 1/2 hours to complete the program demographic, staffing, and partnership data collection and 1.5 hours per enrollee. Based on TPSIDs' projections of enrollments, we expect the 56 TPSIDs to have an average enrollment of 631 students each year. Therefore, the expected data entry time for each year is 946.5 hours to aggregate program data on enrollees (1.5 x 631), and 140 hours to aggregate additional program data (2.5 x 56) for a total yearly data entry time of 1,086.5 hours.

We also asked a small sample of pilot test participants for their hourly cost of staff time for data entry and the average hourly cost was \$31. Based on that average rate, the 1,086.5 hours of burden costs responding TPSIDs a total of \$33,682.

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 :

Total Annual Costs (O&M) :

Total Annualized Costs Requested :

TPSIDs should be able to complete this data reporting using existing computer equipment, so no additional cost burden beyond the staff resources is expected.

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.

The estimated cost to the federal government for this data collection activity over the next three years is \$228,773, distributed as outlined in Table 1.

Table 1 Cost to federal government

Year 1 (system design and startup costs)	2011	\$41,347
Year 2	2012	93,713
Year 3	2013	93,713
Total over 3 years		\$0

A more detailed tabulation of costs is provided in Table 2.

Table 2 Specific tabulation of costs

Initial startup costs (6 months, Jan-June, 2011)	
.6 FTE Research Associate	\$18,600
.2 FTE Research Study Coordinator	4,060
.2 FTE Research Associate	4,810
.1 FTE PI	4,980
.1 FTE Co-PI	4,750
Consultant fees	1,600
3 months Quickbase service at \$849/mo.	2,547
<i>Total startup costs</i>	<i>\$0</i>
Yearly ongoing costs	
.4 FTE Research Associate	\$25,679
.4 FTE Research Study Coordinator	16,862
.4 FTE Research Associate	19,924
.1 FTE PI	9,960
.1 FTE Co-PI	9,500
Consultant fees	1,600
Quickbase service at \$849/mo.	10,188
<i>Total costs per year</i>	<i>\$0</i>

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

This is a new collection, therefore all burden is new. This program change results in an increase in burden of 1,087 hours and 56 responses.

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.

Each year after the data submission deadline, Coordinating Center staff will summarize the evaluation data provided for the preceding year; all data will also be summarized at the conclusion of the five-year project. Data analysis will take place using SPSS and will consist primarily of descriptive and frequency analyses. These data summaries will be provided to OPE in an annual report and published on the project web site. The data will also be used in presentations at national conferences (at least 3) and manuscript submissions to journals (at least 2). Table 3 indicates the original time schedule of project activities for the entire five-year project period. However, since we do not yet have OMB approval this schedule will need to be altered.

Table 3 Time schedule of project activities

Activity	2011				2012				2013				2014				2015			
	Q1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Development of data collection instruments	X	X																		
Pilot testing and OMB review			X	X	X	X	X													
Data collection								X	X	X	X	X	X	X	X	X	X	X	X	
Closeout of year's data collection & data cleaning/follow-up								X		X				X						X
Descriptive analyses								X	X		X			X						
Write & disseminate Annual Report												X			X					X
Conference presentations				X				X					X		X		X	X	X	
Manuscripts submitted to journals										X			X							X
Final report																				X

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.

We are not seeking approval to not display the expiration date for OMB approval.

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

There are no exceptions.

Appendix A: Higher Education Opportunities Act (HEOA) Amendments of 2008

Section 767(d): USE OF FUNDS – An institution of higher education (or consortium) receiving a grant under this section shall use the grant funds to establish a model comprehensive transition and postsecondary program for students with intellectual disabilities that –

(5) participates with the coordinating center established under section 777(b) in the evaluation of the model program.

Section 777(b)(5) REQUIREMENTS OF COOPERATIVE AGREEMENT – The eligible entity entering into a cooperative agreement under this subsection shall establish and maintain a coordinating center that shall –

(C) develop an evaluation protocol for such programs that includes qualitative and quantitative methodologies for measuring program attributes and characteristics along with aggregate student data in the areas of academic enrichment, socialization, independent living, and competitive or supported employment.