

## SUPPORTING STATEMENT

### FOR PAPERWORK REDUCTION ACT SUBMISSION

#### TECHNICAL ASSISTANCE AND CONTINUING EDUCATION PROGRAM NEEDS ASSESSMENT, WORKPLAN AND EVALUATION GUIDE

##### 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 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<sup>1</sup>. 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.**

OSERS funded ten regional Technical Assistance and Continuing Education (TACE) Centers between September and December 2008 that currently and will continue to provide technical assistance (TA) and continuing education (CE) to state vocational rehabilitation (VR) agencies that provide VR and independent living (IL) services to individuals with disabilities under the Rehabilitation Act of 1973, as amended and organizations that support state VR agencies (called partners).

The 2008 Notice of Final Priority (NFP) under which the TACE Centers were funded requires them to conduct an annual assessment of the TA and CE needs of the agencies and partners in their regions. Based on the information gathered from their needs assessments, the TACE Centers annually develop workplans that identify the needs they will address and how they will address them. The needs assessments and workplans are submitted annually to the Rehabilitation Services Administration (RSA) for review and approval.

The NFP for the TACE Centers also requires TACE Centers to report data on the activities they conduct under their workplans. This data includes:

- The number of agency personnel participating in the activities;
- The type of agency personnel participating in the activities;
- The topics of the activities; and
- The participant evaluation of relevance, effectiveness, and quality of the activities.

The TACE Centers will no longer submit their data collection via the Internet through the RSA Management Information System (MIS). The TACE Centers will begin inputting their data

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<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

collection, needs assessment, and workplan information into an Excel spreadsheet and will be uploading and submitting it online through G5, the Department of Education's Grants Management system, as part of their required annual performance report (ED 524B). In addition, the TACE Centers will be required to submit their workplans annually instead of semi-annually.

**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 data, needs assessment information, and workplan information to be collected will be analyzed and evaluated by RSA for the following purposes:

1. To track the TA and CE needs of state agencies under the Rehabilitation Act of 1973, as amended;
2. To track the progress of TACE Centers at meeting those TA and CE needs;
3. To determine where coordination and collaboration between TACE Centers can be achieved to maximize time and resources; and
4. To evaluate the performance of TACE Centers.

The TACE Centers will be evaluated not only on the basis of their ability to meet the TA and CE needs of agencies and partners, but also in accordance with standard performance measures used for TA programs at the Department of Education which are:

- percentage of TA and CE services provided that are deemed to be of high quality;
- percentage of TA and CE services provided that are deemed to be of high relevance; and
- percentage of TA and CE services provided by the TACE Centers that are deemed to be useful in improving State VR agency policies and practices.

Data collected through this IC will enable RSA to calculate these performance measures.

**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.**

TACE Centers will utilize an Excel spreadsheet to enter their collection of information and will upload the spreadsheet(s) into G5 as an attachment. Once a workplan has been developed and implemented, the TACE Center will use the same data collection method to provide data on its activities, such as the number and type of personnel who received TA and CE. Previously, the TACE Centers uploaded this information into RSA's Management Information System (MIS), but this process proved burdensome to the grantees. We anticipate the use of the Excel spreadsheet will be less cumbersome.

TACE Centers will survey recipients of TA or CE using their own methodology. A copy of the survey to be administered by the TACE Centers is included in this clearance package. The TACE Center is responsible for aggregating the information from the surveys and entering it into an Excel Spreadsheet.

**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.**

The TACE Program is a fairly new program and no similar program exists in RSA. Therefore, there is no similar information collection.

**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 for the ten regional TACE Centers will 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.**

TACE Centers need to create new needs assessments and workplans on an annual basis because they are used to determine their activities for the following year. TACE Centers can provide data on their activities at any time, but RSA will require that they update their plans with data annually. Every July, the Centers will submit data that will be used (1) as their annual progress report to determine whether they qualify for continuation of funds; and (2) to close out the existing workplan and begin a new one.

**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.**

This information will be collected consistent with 5 CFR 1320.5.

**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.**

RSA published a 60-day and 30-day Federal Register notices on this IC for public comment. RSA received two public comments which are attached.

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

There are no gifts or payments to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the 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.<sup>2</sup> 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.

**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.**

There are 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 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**

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<sup>2</sup> Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

**types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**

- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The estimated hour burden is 817 hours Needs Assessment

The estimate below includes not only the time to enter information into the Excel spreadsheet, but also the time to collect the information from the agencies and partners being assessed.

Number of Respondents = 10  
Frequency of response = Annually  
Annual hour burden per TACE = 42 hours  
Annualized cost per TACE = \$1,640  
Annual hour burden for program overall = 467  
Annualized cost for program overall = \$16,400

Workplan

The estimate below includes not only the time to enter information into the Excel spreadsheet, but also the time to negotiate the workplan with agencies and partners to receive services. It also includes the time to update the workplan once a year.

Number of Respondents = 10  
Frequency of response = Annually  
Annual hour burden per TACE = 25 hours  
Annualized cost per TACE = \$1,025  
Annual hour burden for program overall = 250  
Annualized cost for program overall = \$10,250

Participant survey

Number of Respondents per TACE = 2,000  
Number of Respondents for program overall = 2,000  
Frequency of response = N/A (each participant will fill out survey once)  
Hour burden per respondent = 3 minutes  
Hour burden for participant survey = 100  
Annualized cost = 0 (costs included in workplan above)

**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. 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 : \_\_\_\_\_**

**Total Annual Costs (O&M) : \_\_\_\_\_**

**Total Annualized Costs Requested : \_\_\_\_\_**

There is no cost associated with the needs assessment, workplan, or participant survey that is not included in item 12 above. Respondents need only to use existing computers and Internet access for this information collection. Further, all ten TACE Centers already administer follow-up surveys to all activity participants for their own purposes.

**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.**

RSA employs a program specialist at the GS-14 level who dedicates 100% of his/her time to the administration of the TACE program. RSA estimates that this program specialist will dedicate 50% of his/her time to this information collection (50% of 102,000 per year = \$51,000).

**15. 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).**

Since the TACE Centers will no longer submit their data collection via the Internet through the RSA Management Information System (MIS), there is a program change decrease of -250 annual burden hours. The centers reported that the RSA MIS was cumbersome as the drop-down menus and the selection options via "check boxes" provided limited choices and did not provide an accurate picture of the services and technical assistance that the centers were providing to the State VR agencies and their partners. The TACE centers also reported that the RSA MIS was time-consuming and at times caused a burden on staff.

The TACE Centers will begin inputting their data collection into an Excel spreadsheet and will be uploading and submitting it online through G5, the Department of Education's Grants Management system. This new data collection method will improve the quality and accuracy of the data collected by reducing incorrect data or misinterpretation of reporting requirements for several key data fields. The information collected on the Excel spreadsheet adheres to the requirements already set forth in regulations and grant agreements.

The TACE Centers will be required to submit their workplans annually instead of semi-annually. This will decrease the burden hours for reporting and will eliminate the duplication of information, which provided limited supportive data in the management of the program.

In addition, there is an adjustment increase of 100 hours for the participant survey, the Department has assessed the potential burden from the participant surveys, and included these hours as an adjustment increase.

**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.**

None of the information in this collection will be published.

**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 will be displayed.

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

There are no exceptions to the certification statement.