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

STUDY OF THE DELIVERY OF SERVICES UNDER THE STATE VOCATIONAL REHABILITATION GRANTS PROGRAM

Office of Management and Budget

Clearance Package

Supporting Statement for Paperwork Reduction Act Submissions

Part A

Justification

March 19, 2013

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

INTRODUCTION

Pursuant to section 14 of the *Rehabilitation Act of 1973* (as amended), the Rehabilitation Services Administration (RSA), in the Office of Special Education and Rehabilitative Services (OSERS) of the U.S. Department of Education (ED), plans to conduct a survey (with limited telephone follow-up) of the 80 state Vocational Rehabilitation (VR) agencies about their delivery of VR services. RSA oversees formula and discretionary grant programs that help individuals with disabilities to obtain employment and live more independently. The Rehabilitation Act Title I formula grant program provides funds to Vocational Rehabilitation (VR) agencies to help individuals with disabilities prepare for and engage in gainful employment consistent with their strengths, abilities, interests, and informed choice through such supports as counseling, medical, and psychological services, job training, and other individualized services.

The purposes of this data collection are to (1) determine the methods and practices used by State VR agencies in delivering services to individuals with disabilities, including optimal patterns of delivery in serving specific populations; (2) determine how, and to what extent, State VR agencies work with partner agencies or programs to deliver services; and (3) examine program outcomes and their associated costs, including identifying cost effective practices for serving specific target populations.

State VR agencies are required under Title I to provide VR services to eligible individuals and to be mandatory partners in the One-Stop workforce investment system. Under the Ticket to Work and Work Incentives Improvement Act, VR agencies have an expanded role in enhancing gainful employment of individuals with disabilities who are Social Security beneficiaries. VR services are administered through a VR agency in every state, the District of Columbia, and the territories. Additionally, in some states, state law authorizes a separate agency to administer VR services for individuals who are blind. Thus there are 80 VR agencies in the Federal-State VR Program.

State VR agencies decide what services to provide to help individuals with disabilities prepare to enter the workforce and engage in gainful employment, or work towards independent living. Most agencies provide help with life skills, job placement assistance, medical treatment, postsecondary education, occupational training, vocational and medical assessments, vocational counseling, and assistive technologies.

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. 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 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 (1) determine the methods and practices used by the 80 State VR agencies in delivering services to individuals with disabilities, including optimal patterns of delivery in serving specific populations; (2) determine how, and to what extent, State VR agencies work with partner agencies or programs to deliver services; and (3) examine program outcomes and their associated costs, including identifying cost effective practices for serving specific target populations.

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 of 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 monitoring program performance, program evaluation and ongoing program improvement by RSA, including the development of training programs and improvement of the long-term meaningful employment of individuals with significant disabilities. The information might also contribute to legislative requirements and improvement of program processes and outcomes, not just knowledge and policy. (See Appendix A for the draft questionnaire.)

The findings are intended to contribute to Federal and State agency knowledge of successful and meaningful service delivery practices, agency partnerships, and costs of service delivery. The findings will have policy implications for the State VR agencies. The study will address the following specific research and evaluation questions:

Patterns of Practices

- 1. How are VR services currently being delivered?
- 2. How do outcomes vary by service delivery approach?
- 3. What promising practices, strategies, policies contribute to improved program results?
- 4. How can service delivery mechanisms be more effective (in terms of outcomes or cost)?

Agency Partnerships

- 5. How do VR agencies work with partner programs and agencies (One-Stops; Developmental Disabilities; Schools; Veterans Affairs; Social Security Administration—SSDI and SSI)?
- 6. How can VR agencies work more effectively with related programs to achieve employment outcomes for individuals with disabilities?

<u>Cost</u>

- 7. What are the costs associated with service delivery practices and outcomes?
- 8. What is the relationship between costs of outcomes and service delivery practices?

9. Are some models or practices more cost effective in serving particular target populations?

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.

The RSA contractor will develop and conduct an electronic survey of all 80 VR agencies using webbased technology. RSA feels it is necessary to survey all VR agencies to get a comprehensive picture of how agencies deliver VR services and partner with other agencies and organizations, and to determine the costs associated with service delivery. 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. 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. The 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 email will provide the password to access the survey (see Appendix E). Each agency will receive a unique user name and password.

Up to three post-survey case study site visits are planned to validate hypotheses developed from the analyses of administrative and survey data, as well as to follow up on interesting perspectives provided in the survey responses. A draft candidate list of at least six agencies will be identified by considering the responses to the survey in the areas of services, coordination and partnerships, and costs. The contractor will determine which three agencies will be visited. The four agencies visited prior to the survey (Arizona, Mississippi, and the two agencies in North Carolina) will not be considered for the post survey visits.

The contractor will develop site visit protocols, tailoring them as appropriate to each VR agency selected. Each protocol will include discussion points for each topic of agency relevance. Broadly speaking, the protocols will focus on service delivery, coordination, and costs, the three main focuses of this study, and to confirm or deny hypotheses. The protocols will be designed as discussion guides, and will focus on the specific areas of interest.

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 about the specific service delivery practices and models in use by state VR agencies, nor about how VR agencies are partnering with other agencies and organizations to provide delivery of services. Administrative data provides some information on the costs of service delivery, but do not provide information on how agencies know that costs are reasonable, nor about sources of cost data and other uses of cost data. RSA and the National Institute on Disability and Rehabilitation Research (NIDRR) are sharing information on their respective funded research and evaluation projects on VR to share results and avoid duplication of activities.

A brief and targeted literature review on the delivery of services under the State VR Grants program, interagency collaboration, and costs provided only very limited information. While existing published literature discusses some methods of service delivery to individuals with disabilities, no research study seems to specifically focus on the models, methods, and patterns in use by state VR agencies for delivering services to individuals with disabilities. Many researchers have focused on provision of Supported Employment (SE) services for individuals with mental/psychiatric disabilities. Other identified models of service delivery discussed by researchers include:

- Work Opportunities for Rewarding Careers (WORC) Program where individuals obtain competitive jobs in the community that pay at least minimum wage and where co-workers are primarily people without disability.
- Customized Employment opportunities (i.e. individualizing the relationship between job seekers and employers that meet the needs of both) through a community rehabilitation program for persons with disabilities.
- Compensated Work Therapy (CWT) which is a Department of Veterans Affairs rehabilitation program that matches and supports veterans with physical and mental disabilities who are ready for the work environment in competitive jobs.

Counselor Plus Case Aide Model of outreach and service delivery for American Indians with disabilities in the State of Minnesota. The main difference between this model and other state agency VR services provided to American Indians is the availability of the American Indian case aides who spend more time on the reservations, built trust among the community and act as the liaison between the VR agency and the American Indian community.

Timmons et al. (2005) identified interagency collaboration as a cross-agency cooperation that involves several components: identifying, recording, and disseminating information on related resources and services; identifying gaps and overlaps in services as well as areas of agency expertise; and leading to strategic decision making that broadens the collective capacities of participating agencies.

Another source of information is RSA's own monitoring reports. Because RSA monitoring activities are limited in scope, number and timing, the monitoring reports provide only limited information and are not always current. A review of 49 RSA monitoring reports (from 2007 through 2010) was conducted by the contractor to understand how state VR agencies deliver services. These reviews covered 71 VR agencies (some reports cover both general and blind agencies). The review indicated that agencies were employing a variety of practices regarding the provision of services, but provided few examples of, or details about, patterns of practice and service delivery models.

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 businesses.

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.

If the data collection is not conducted, RSA will not acquire needed information about the vocational rehabilitation system, particularly the service delivery process and how well it is working, and identifying challenges to serving specific populations, challenges to coordination, and challenges to improved service delivery. In addition, the study is intended to obtain information from state VR agency leadership about their perceptions of coordination, cost

effectiveness, and service delivery issues. If the data collection is not conducted, RSA will be restricted in its ability to improve program management and effectiveness.

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.

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.

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 will be published in the *Federal Register* for public comment.

As part of the survey development, the RSA contractor consulted with RSA staff members who have state VR agency experience and have participated in agency monitoring activities. The contractor also conducted a pretest of the draft questionnaire with four state VR agencies, and made revisions based on their feedback.

The contractor later shared the revised instrument with the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Council of State Agencies for the Blind (NCSAB).CSAVR provided comments on a few questions. RSA and the contractor revised the instrument based on the CSAVR comments, eliminating several questions and rewording a few others.

9. 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.

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.¹ If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with

¹ 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)

respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentially of the data.

Responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. The contractor will not provide information that identifies a subject or district to anyone outside the study team, except as required by law. There are no assurances of confidentiality to respondents. Respondents are state agencies, not individuals. 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.

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 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. They will be told that they can refuse to answer a question if they do not want to answer it.

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 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.

Table 1 includes an estimate of the burden for the respondents to respond to the survey instrument. Because this is a one-time survey, the total burden for survey data collection is estimated to be 240 hours. The estimated time burden is derived from the pretest of the instrument and from RSA staff members who have state VR agency experience. The estimate is based on 80 potential respondents each taking three hours to complete the survey. The contractor sent the instrument to CSAVR and NCSAB to obtain feedback on and endorsement of the survey. CSAVR responded saying it endorses the survey.

The contractor will also conduct post-site visit interviews with three VR agencies for case studies exploring hypotheses derived from the survey and administrative data about service delivery, interagency collaboration, and cost effectiveness of service delivery. The estimate of time anticipated for the site visit interviews with three agencies is 72 hours: 24 hours per agency. The total burden to complete the online survey and the site visit interviews is estimated to be 312 hours.

Table 1. Estimates of	information cone	ction burder	1		
				Estimated	
				Hourly Cost	Estimated
				to	Total Cost to
Instrument/Path	Completions	Minutes	Hours	Respondents	Respondents
State VR agency staff—	80 agencie	s 14,44	0 240	\$35	\$8,400

Table 1.Estimates of information collection burden

Web survey					
State VR agency staff—					
Site visit interviews	3 agencie	s 4320	72	\$35	\$2,520
Total		18,76	0 312		\$10,920

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 startup 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 :

Total Annaulized Capital/Startup Cost: 0

Total Annual Costs (O&M):0Total Annual Costs Requested:0

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

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 total cost to the Federal Government associated with this data collection is \$431,036. This cost represents the value of contractor services over a period of 36 months to perform all activities associated with the proposed data collection. The annualized cost per year is \$106,466 in the first year, \$278,018 in the second year, and \$46,552 in the third year.

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

- Pre-survey site visits to four state VR agencies (completed)
- Development of survey instrument and pretesting of the survey instrument (completed)
- Data collection all aspects, including establishment and maintenance of website
- Post-survey site visits to three state VR agencies
- Analysis and reporting

These costs are derived from the contractor budget and do not include costs for unrelated tasks covered under the contractor task order contract (i.e., tasks1-6 and 12 identified in Table 3). The expense categories are shown in Table 2. The amount for subcontractors reflects their active involvement in most of the data collection activities, including pre- and post-survey site visits, development of the survey instrument, and the analysis and reporting. Other direct costs include travel expenses and server charges for development, testing, and hosting the online survey.

Table 2. Distribution of costs.

Expense Categories	Cost to the Federal Government		
Labor	\$113,502		
Subcontractors	\$154,358		
Other direct costs	\$47,686		
Overhead, G&A, and fee	\$115,490		
TOTAL	\$431,036		

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).

This is a new collection. Therefore, the entire burden of 312 hours is new.

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.

A draft and final evaluation report will be produced based on the web survey completed by State VR agencies as well as site visit interviews and analysis of RSA administrative data. In addition, Westat will develop draft and final briefing reports, and project data files. An evaluation report will be prepared covering each of the main evaluation areas of the study and addressing the evaluation questions. The reports will include descriptive and analytic information that address the evaluation questions and draw conclusions about the area under discussion. The writing of the report and executive summary will be in a manner suitable for distribution to a broad audience. To the extent possible, the report will highlight promising practices by state VR agencies that may be suitable for adoption or adaptation by others to increase program success or program efficiencies. The report will also identify possible barriers to successful implementation by other agencies.

The contractor and ED will disseminate information about the findings of the study following ED clearance at 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 subpopulations of individuals, and other factors regarding coordination with other agencies and organizations for the delivery of VR services. Open-ended items will be downloaded into Microsoft Word for sorting and coded into meaningful categories.

Task	Timeline	Deliverable	Completion	
			status	
1. Project startup workshop	October 2010	Meeting notes	Completed	
2. Literature review	October 2010 – May 2011	Review	Completed	
3. Finalize comprehensive evaluation plan	October 2010 – May 2011	Evaluation plan	Completed	
4. Capture RSA technical knowledge through meetings	October 2010 – September 2012	Summaries of meetings	Completed	
5. Review of administrative performance and cost data	October 2010 – September 2011	Summary of key findings	Completed	
6. Develop preliminary state agency profiles; select agencies for pre-survey site visits	October 2010 – September 2013	Pre-site visit state profiles List of sites	Completed	
7. Conduct preliminary site visits	November 2011 – January 2012	Protocols; site visit reports	Completed	
8. Develop survey instrument and prepare clearance package	December 2011 – February 2013	Instrument Clearance package	Completed	
9. Conduct and analyze survey of state VR agencies	July 2013 – August 2013	Survey report	To be conducted	
10. Conduct post survey site visits	August 2013 – September 2013	Protocols; site visit reports; updated profiles	To be conducted	
11. Prepare evaluation reports, briefings, presentation materials	August 2013 – December 2013	Briefings; evaluation report; presentation materials	To be conducted	
12. Cost modeling	January 2011 – February 2013	Memo; issue paper; specifications; cost models	Completed	

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 as required on the survey form.

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

There are no exceptions to the certification statement.