

RESPONSE TO QUESTIONS ED-2013-ICCD-0049 Public Comments

OSERS received the following comments from a single commentator:

Is the collection necessary to the proper functions of the Department?

One comment simply said “no.” Without a justification for this statement, the Department maintains as stated in the Justification Statement that the collection is necessary to the proper function of the Department.

Will this information be processed and used in a timely manner?

One comment simply said “yes.”

Is the estimate of burden accurate?

One comment said that the estimate of burden of 3 hours per agency to complete the survey seems low, stating that it will take an agency 80 hours to complete it because of the need to consider time to collect data, coordinate data collection from multiple sources, vet the data, and electronically enter the data to the data collection system.

The Department recognizes that the burden may be low for some state VR agencies that operate a large number of centers. *{The burden estimate is revised to 16 hours based on pretesting of the instrument. The instrument was pretested with two states. In addition, the Research Committee of the Council of State Administrators of Vocational Rehabilitation reviewed the instrument twice and had no comments about the burden estimate.}*

How might the Department enhance the quality, utility, and clarity of the information to be collected?

One suggestion was to more clearly define the term “outcomes” throughout the instrument. Question 58 was specific to say employment outcomes, but Questions 44, 48, 52, and 61 were not specific. The Department will revise the instrument to more clearly define the outcomes. *{... employment outcomes for questions 48, 52, and 61; educational and/or employment outcomes for question 44}*

One suggestion was to define what the term “consumer outcomes” means for the response options of questions 22 and 29, instead of using the generic statement, “to improve consumer outcomes.” The Department will rephrase the response options. *{...to improve employment outcomes.}*

One suggestion to enhance utility of the information collected was to ask for additional information about changes being considered for implementation (on Questions 47, 51, 57, and 60), including explain why the changes are being considered or what specific purposes the

changes are expected to accomplish. The Department agrees that the additional information would be useful, but is concerned about increasing the burden on agencies. The instrument will allow respondents to provide this additional information if they want to include it.

One comment stated that having access to the results of the survey electronically would increase the usefulness of the information, and providing breakdowns of the responses to individual data elements would help other agencies replicate successful practices. The Department will analyze the survey results and produce reports. The Department intends to share findings, especially about promising practices, with the state VR agencies.

One comment was to clarify the information to be collected by spelling out acronyms the first time they appear. The Department will revise the instrument to spell out all acronyms.

One comment was to clarify the meaning of full-time and part-time employment. The Department will revise the instrument to clarify these terms. *{full-time is working 35 or more hours per week; part-time is working less than 35 hours per week, but at least one hour per week}*

How might the Department minimize the burden of this collection on the respondents, including through the use of information technology?

No comments received.