

## SUPPORTING STATEMENT

### FOR PAPERWORK REDUCTION ACT SUBMISSION

#### Annual Progress Reporting Form for the American Indian Vocational Rehabilitation Services Program 1820-0655

##### 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, or you may provide a valid URL link or paste the collection of information, or applicable section. Please limit pasted text to no longer than 3 pages. 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.**

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (ED) requests a revision to an information collection for which approval expires on September 30, 2014. This is a web-based annual reporting form that is completed by grantees funded under the American Indian Vocational Rehabilitation Services (AIVRS) program, authorized under Section 121 of the Rehabilitation Act of 1973, as amended (Public Law 93-112).

The form collects data on grantees' program activities. RSA staff will use this information to meet the requirement for an annual report to Congress in the Rehabilitation Act and the Education Department General Administrative Regulations (EDGAR) requirements requiring annual progress reports from grantees, as well as to facilitate program planning efforts required under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62).

This data collection supports: 1) The Rehabilitation Act, which requires AIVRS grantees to report on specific identified activities; and 2) EDGAR, which outlines annual reporting requirements that must be met by applicants and grantees. The regulatory requirements that apply to the RSA grant programs include 34 CFR Parts 75, 77, 80, 81, and 82. Specifically, 34 CFR 75.590 requires grantees to submit an annual performance report, or, for the last year of a project, a final report. RSA will use the form to capture the most current performance and financial expenditure information of the grantee, in order to determine substantial progress for continuation funding, as required in EDGAR section 75.118.

Additionally, as part of ED's performance reporting requirements under GPRA, RSA must collect information to support: (a) implementation of a comprehensive plan that includes goals and objectives for the program, (b) measurement of the program's progress in meeting its goals and objectives, and (c) submission of an annual report on program performance, including plans for program improvement, as appropriate.

The revised information collection for which RSA is requesting approval is designed to fulfill all of the above requirements and needs for the AIVRS program.

Proposed changes to the existing form, which will improve user friendliness and the clarity and accuracy of data reported, are not of a substantial manner nor significantly different from the original collection, but are proposed to provide clarity and consistency. In many areas, the data element language has been modified using direct language instead of passive terminology.

**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.**

RSA and ED will use the information gathered annually to: (a) comply with reporting requirements under EDGAR and provide annual information to Congress on activities conducted under the program, (b) measure performance on the program's GPRA indicators, and (c) to collect information that is consistent with the common measures for federal job training programs.

(a) Comply with Reporting Requirements under EDGAR and Provide Annual Information To Congress

The data collected from the AIVRS grantees will provide a national description of the types of activities that tribal vocational rehabilitation (VR) programs conduct to serve the VR needs of American Indians with disabilities. RSA will also use the data collected in preparing its annual report to Congress, as required by the Rehabilitation Act. This data will be used by RSA staff in desk and on-site monitoring of grantees. The data collected will help policy makers better understand the barriers, opportunities, and outcomes involved in improving VR services for American Indians with disabilities. Further, grantees can use the data for their own purposes as they discuss, plan, generate support for, and implement VR programs and services for American Indians with disabilities.

In order to provide the most accurate and comprehensive documentation of AIVRS activities, the form will collect information from the AIVRS grantees in the following areas:

1. Budget and Narrative
2. Project Goals and Objectives
3. Serving American Indians with Disabilities
4. VR Services
5. Educational Goals and Employment Outcomes
6. Job Training Common Measures
7. Interaction with State VR Agencies
8. Evaluation
9. Consumer Satisfaction

(b) Measure Performance on the AIVRS Program's GPRA Indicators

The indicators for AIVRS that this data collection will address include:

1. Percentage of all eligible individuals who exit the program after receiving services under an individualized plan for employment (IPE) that achieve an employment outcome (calculated by dividing the number of individuals who ended their participation in the program after receiving services under an IPE that achieve an employment outcome by the total number of individuals who ended their participation in the program after receiving services under an IPE).
2. Cost per Employment Outcome (calculated by dividing the total Federal grant funds by the number of individuals that achieved an employment outcome after receiving services)
3. Number of American Indians with disabilities receiving services under an IPE.

(c) Collect Information Consistent with the Common Measures for Federal Job Training Programs.

One of the recommendations that resulted from the FY 2004 PART review of the AIVRS program was to revise the program's measures to be comparable to other job training programs and develop a strategy for collecting data to support the Common Measures for Federal Job Training Programs developed by OMB. As a result of the recommendation, the form that expires on September 30, 2014 was implemented and incorporated data elements to collect the following data that address the common measures for adult job training programs:

- The number of participants that exit the program, including (a) individuals who have achieved an employment outcome after receiving VR services and (b) individuals who have not achieved an employment outcome but have received services from the project.
- The average weekly earnings of individuals whose employment outcome resulted in earnings.
- The number of individuals who had earnings at the time of eligibility determination.
- The average weekly earnings at the time of eligibility determination.
- The average weekly earnings at the time of achieving an employment outcome.
- The number of eligible individuals who were employed three months after achieving an employment outcome ("Status 26").
- The number of eligible individuals who were employed six months after achieving an employment outcome ("Status 26").
- The number of individuals who exited after achieving an employment outcome and who have received post-employment services.

**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 entire submission is done electronically. The use of this web-based data collection form significantly reduces grantee burden in the following ways:

- The format is user friendly and requires minimal narrative.
- During year one of a grant, a grantee will enter all relevant project information. In subsequent years, the system provides grantees with previously entered data, allowing them to make the necessary edits to this previously entered data. Grantees will not have to re-enter data from year to year, as was required in past years when paper forms were in use.
- The web system permits grantees to enter information on an ongoing basis during the reporting period, thereby giving grantees the option to use the system for their internal management purposes without having to spend their own resources to develop such a tool.
- The system will total all numeric entries for an end-of-the year report.

The system uses ColdFusion and Microsoft SQL Server software. Advantages to RSA staff in using this type of dynamic database software are as follows: (a) immediate access to information submitted by grantees; (b) the ability to identify which grantees submitted completed forms (via the Internet); (c) generate reports, even from partial data, as requested by Congress or ED; (d) ability to send emails to all grantees prior to the due date of performance reports; and (e) ability to send emails to grantees that do not submit performance reports by the due date.

The System complies with Federal Accessibility standards implementing Section 508 for Internet Applications, Part 36 CFR 1194.22, thus assuring full access to users with disabilities.

The Management Information System (MIS) complies with all the U.S. Department of Education's security procedures. It has been previously certified and accredited and is currently in the process of being re-accredited in FY 2014.

**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 data is not otherwise available, and the form does not duplicate items from any other federal data collection efforts.

**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. 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.**

No small businesses or other small entities will be part of this data collection.

**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 proposed data collection supports the following activities: a report to Congress that is required to be submitted on an annual basis and GPRA data that is required to be collected from RSA American Indian grantees. If the information is not collected, data on key aspects of these programs for American Indians with disabilities will not be available. Consequently, RSA would be unable to meet statutory and regulatory requirements for collecting and reporting of data on grantees' activities and outcomes.

**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.**

The proposed revised data collection does not require any of these special circumstances.

**8. If 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.**

The proposed revised data collection is consistent with guidelines set forth in 5 CFR 1320.8(d).

**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.**

The current AIVRS grantees have been included in the development and revision of the form. Since FY 2011, RSA Program staff has provided technical assistance to grantees regarding the submittal of data and grantees have provided comments and feedback regarding the functionality of the MIS database which houses the AIVRS reporting form.

In preparation for revising the form that expires on September 30, 2014, RSA shared the draft form with the current grantees and held a teleconference on March 27, 2014 to update and receive input from the project directors on the proposed revisions being considered to the AIVRS reporting form. The project directors raised a number of questions and provided feedback that was used to improve the language in some data elements to ensure the clarity and consistency of data reported.

A 60-day and 30-day Federal Register Notice was published inviting public comment.

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

No payments or gifts have been or are to be provided 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. 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). 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, only aggregate data will be collected. With no personally identifiable data collected and no questions of a personal nature regarding individual program participants.

**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.**

The data collection does not include 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 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 number of grantees funded under the AIVRS Program varies from year to year, with an estimate of 85 grantees currently reporting. The respondents will need 12.5 hours estimated to complete for a total annual burden of 1,062.5 hours. Based on reporting from previous years, grantees needed an average of 13 hours to complete the reporting form that expires September 2014. The decrease in response burden is due to some of the fields being automatically populated. The system performs auto calculations, and there is a reduction in data entry. The past cost to respondents was estimated to be \$30 per hour for the instrument expiring September 2014, but due to increases in the cost of living, this estimate for the revised instrument is increased to \$30.30 for a total cost of \$378.75 per respondent.

**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	: \$ .00
Total Annual Costs (O&M)	: .00
Total Annualized Costs Requested	: \$ .00

This is an annual progress reporting form. There are no capital costs and no equipment purchases are necessary. The operating cost is \$378.75 per grantee multiplied by 85 grantees for a total cost of \$32,193.75.

**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 will host and maintain the report web site and reporting system on ED's server. RSA employs information technology specialists who dedicate time for the update and maintenance of the AIVRS data collection in the MIS system. The estimated annualized cost of operating the system is \$5,500 in FY 2014. In addition, RSA program personnel time estimated for two supervisory managers at .5% of their time and two program managers, GS-13 at 20%, and one-half time of a program manager, GS-13 at 10% equals approximately \$55,028. The total estimated annualized cost to the Federal government is \$60,528.

**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 information collection includes a program change decrease of -3 burden hours from 1,066 hours to 1,063 hours. The burden hour reduction of -3 hours is due to in many cases to revising data fields for clarification with direct language and the automatic calculation of several data element fields. We estimate with these adjustments the number of hours per response will decrease from 13 to 12.5. However, the number of grantees has increased from the previous collection submittal by 3.6%. In the previous collection, there were 82 grantees responding, but currently there are 85 grantees reporting.

The estimated number of proposed responses multiplied by the response burden hours follows:

Responses: 85  
Burden Hours: 12.5  
Difference in Current OMB inventory: 3 burden hours

**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.**

RSA staff will use the information collected from the annual progress reporting form to report annually to Congress and for program monitoring purposes. RSA will generate standard reports to meet requirements of the Rehabilitation Act, EDGAR, and GPRA. The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of RSA staff, ED staff, and Congress under provisions of the Rehabilitation Act, EDGAR, and GPRA. RSA will prepare these reports according to statutory and regulatory requirements. RSA will prepare other data tabulations on an as-needed basis to meet specific information needs.

**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 three-year expiration date for OMB approval will be displayed on the Internet version of the form and hard-copy versions.

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

There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods**

No statistical methods will be used for this data collection, as all RSA grantees will be asked to complete the progress form. In fiscal year 2014, RSA is estimating 85 respondents.