

## SUPPORTING STATEMENT

### FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB Number: 1820-0013

#### 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. 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.

Section 13 of the Rehabilitation Act of 1973, as amended (the Act) requires the Commissioner to submit a full and complete Annual Report to the President and Congress within 180 days after a fiscal year (FY) on the activities carried out under the Act. This Annual Report should include statistical data reflecting services and activities provided to individuals during the preceding FY. The RSA-113 fulfills a major role in helping the Commissioner comply with the Annual Report requirement by providing timely data on the overall dimensions of the state vocational rehabilitation (VR) program.

The RSA-113 data are submitted quarterly by State vocational rehabilitation (VR) agencies. VR agencies that administer vocational rehabilitation programs provide key caseload data on this form, including numbers of individuals who are applicants, determined eligible/ineligible, waiting for services, and their program outcomes. These data are used for program projections, planning, management, budgeting, and general statistical purposes.

Due to the impending passage of WIOA, revision of this form was postponed because of the expectation of the ability to consider the data collection changes of WIOA for the revision of this data collection. The July 22<sup>nd</sup> 2014 enactment of WIOA was later than expected; consequently with the February 28<sup>th</sup> 2015 expiration date of this form, it has become necessary to extend it without any changes in order to continue collection of its data elements; any non-substantive changes based on the rulemaking public comments will be submitted to OMB for approval to use revisions.

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 Commissioner will use and has used the RSA-113 data for the purposes listed in response to Question 1. The RSA-113 data are also used to determine trends in the acceptance and rehabilitation of applicants for rehabilitation services. These data have

been used for the generation of outcome measures permitting assessment of state agency productivity. The outcome measures, in turn, form the basis for monitoring and the timely delivery of technical assistance to state agencies, when warranted. In addition, RSA-113 data are employed in the budget development process and are frequently requested by the Office of Management and Budget (OMB), the Secretary and Assistant Secretary, and by the Congress and its staff.

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.

RSA has a Management Information System that agencies use to access the data collection directly through the internet by using the following URL: <http://rsa.ed.gov>. Agencies do not submit hardcopy media of the RSA-113.

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 information requested on the RSA-113 represents a portion of greater caseload detail already available in state rehabilitation agencies. The agencies, therefore, have only to extract a limited amount of caseload flow data from their own on-going data collection systems when preparing the RSA-113. The RSA-113 is the only RSA report dealing with current and total state agency caseload flows. No similar information is available from other sources.

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.

Respondent are agencies of state governments only. There is no impact on 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.

RSA-113 data are to be collected quarterly. These data provide current perspectives and insights into caseload trends in individual state agencies that permit early detection of questionable and undesirable trends (e.g., reductions in the number of persons with significant disabilities entering the caseloads, declines in acceptance rates and rehabilitation rates, increasing backlogs of eligible individuals who cannot be served, etc.). Using quarterly RSA-113 data, RSA staff can perform their oversight functions

more knowledgeably in their continuing contacts with state agencies and provide expeditious technical assistance, when needed. Without quarterly data, their monitoring and technical assistance functions will be seriously limited. Further, the availability of quarterly data permits informed judgments about trends to be made for use in the budget development and preparation process.

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;  
There are no circumstances that require respondents to report information 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;  
This collection has been in effect for several years and collects information that the respondents maintain continuously. There are no circumstances that require a written response in fewer than 30 days after receipt.
- requiring respondents to submit more than an original and two copies of any document;  
Respondents are required to submit the information for the RSA-911 in RSA's MIS as stated in number 3 above.
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;  
Respondents are not required to retain 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;  
This collection is not a statistical survey.
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;  
The collection is 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  
The RSA-113 is an aggregated report form of caseloads and does not identify individual information.
- 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 RSA-113 report does not require proprietary trade secrets of other confidential information.

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 regularly contacts the Council of State Administrators of Vocational Rehabilitation (CSAVR) on developments affecting the RSA-113. CSAVR is an umbrella organization, headquartered in suburban Washington, DC, representing the 80 respondents (state VR agencies).

Also a 60-day and 30-day notice was published in the Federal Register for public comment, with no comments received during the 60-day FRN comment period.

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 payments of gifts 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.

The RSA-113 is an aggregated report form of caseloads and does not identify individual information. There are no assurances of confidentiality necessary to be provided to respondents.

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.

Data collected on the RSA-113 is not 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.

Estimates of reporting burdens are based on the experience of many years of caseload data collection as well as discussions with respondent representatives. Estimates for both reporting and record-keeping indicate minimal burden because the data called for by the RSA-113 are limited in scope and are maintained by respondents for their own needs and use.

Some states have a separate agency for the blind and visually impaired, while other states have a single state agency. Currently 80 agencies are required to respond to the RSA-113.

Estimated time to edit, collect and submit summary data on the RSA-113 Report – 1 hour and number of respondents - 80

Number of quarterly collections from each respondent annually – 4

Total number of responses annually – 320

Annual cost to respondents: 320 burden hours X \$20/hour = \$6,400

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:

This collection does not require capital costs, start-up costs, maintenance costs or the purchase of services for the respondents. The summary data required is already maintained for the purpose of maintaining its federal grant. There are no additional costs for this RSA-113 report.

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.

Annualized Estimated Federal Cost:

Annual Federal Costs		
50 hours X \$25 per hour	\$	3,750
Annual federal computer costs:	\$	<u>500</u>
	\$	4,250

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).

There are no program changes or adjustments associated with this request.

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-113 data are due 30 days after the first three quarters of the FY, and 60 days after the fourth quarter, or end of the FY. By the middle to the end of the succeeding month, reports for all state rehabilitation agencies will be collected, edited, revised if necessary, and tabulated. The tabulation comprises eight tables of data displaying all RSA-113 data for state agencies. The tables contain a variety of analytical measures and comparisons such as percent distributions, percent changes from previous year, percent of caseload composed of significantly disabled persons, acceptance rates and rehabilitation rates. They are also shown by type of agency (general/combined and agency for the blind).

Data for the fourth quarter represent annual totals that are published as "Caseload Statistics" on RSA's website early in the succeeding calendar year. The annual totals are also made available, along with an accompanying analysis, for the Annual Report to the Congress required by Section 13 of the Rehabilitation Act.

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 for OMB approval 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 identified in Item 21 of OMB Form 83-1.