

**REHABILITATION SERVICES ADMINISTRATION
STATE GRANT FOR ASSISTIVE TECHNOLOGY PROGRAMS
ASSISTIVE TECHNOLOGY ACT OF 1998, AS AMENDED
Annual Assistive Technology Act Data Collection Report**

REQUEST FOR OMB APPROVAL

**SUPPORTING STATEMENT REQUIRED UNDER
THE PAPERWORK REDUCTION ACT**

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.

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (ED) requests clearance for the revision and renewal of a data collection instrument, Office of Management and Budget (OMB) Control Number 1820-0572, to be completed by grantees under the Assistive Technology Act of 1998, as amended (Public Law 108-364).

The information collected through this data collection instrument is necessary for RSA and states to comply with Sections 4 and 7 of the Assistive Technology Act of 1998, as amended (AT Act), and for states to satisfy the reporting requirements in 34 CFR 76.720, which requires an annual report of program performance. RSA is requesting a revision and renewal of the annual data collection instrument (OMB No. 1820-0572). Approval of 1820-0572 expires September 30, 2014.

Section 4 Requirements Necessitating Data Collection

Section 4 of the AT Act authorizes grants to public agencies in the 50 states and the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Marianas (states and outlying areas). With these funds, the 56 states and outlying areas operate "Statewide AT Programs" that conduct activities to increase access to and acquisition of assistive technology (AT) for individuals with disabilities. These comprehensive activities are divided into two categories: "State-level Activities" and "State Leadership Activities."

According to Section 4 of the AT Act, as a condition of receiving a grant to support their Statewide AT Programs the 56 states and outlying areas must provide to RSA: (1) applications and (2) annual progress reports on their activities.

Applications: The application required of states and outlying areas is a three-year State Plan for Assistive Technology (State Plan for AT or State Plan) (OMB No. 1820-0664). The content of the State Plan for AT is based on the requirements in Section 4(d) of the AT Act. As a part of this State Plan, Section 4(d)(3) of the AT Act requires that states and outlying areas set measurable goals for addressing the assistive technology needs of individuals with disabilities in education, employment, community living and information technology/telecommunications.

Every state and outlying area is required to include a minimum of seven prescribed measurable goals in its State Plan. These seven goals apply to all states and outlying areas in order to aggregate information on performance of the program at the national level. National aggregation of data related to these goals is necessary for the Government Performance and Results Act (GPRA), as well as an Annual Report to Congress (see “Section 7 Requirements Necessitating Collection” below). Therefore, this data collection instrument provides a way for all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands to collect and report data on their performance in a consistent manner, including a uniform survey to be given to consumers. This uniform survey is included as part of the data collection package.

Annual Reports: In addition to submitting a State Plan every three years, states and outlying areas are required to submit annual progress reports on their activities. The data required in that progress report is specified in Section 4(f) of the AT Act.

Section 7 Requirements Necessitating Collection

Section 7(d) of the AT Act requires that RSA submit to Congress an annual report on the activities conducted under the Act and an analysis of the progress of the states and outlying areas in meeting their measurable goals. This report must include a compilation and summary of the data collected under Section 4(f). In order to make this possible, states and outlying areas must provide their data uniformly. This data collection instrument was developed to ensure that all 56 states and outlying areas report data in a consistent manner in alignment with the requirements of 4(f).

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.

As stated above, RSA will use the information collected via this instrument to:

- (1) Complete the annual report to Congress required by the AT Act;
- (2) Meet the performance reporting requirements in Section 76.720 of the Education Department Administrative Regulations (EDGAR);

- (3) Comply with reporting requirements under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62); and
- (4) Assess the progress of states and outlying areas regarding measurable goals in their State Plans for AT.

Data collected from the grantees will provide a national description of activities funded under the AT Act to increase the access to and acquisition of AT devices and services through statewide AT programs for individuals with disabilities for use by Congress, the Department, and the public. In addition, RSA will use this data to inform its program management, monitoring, and technical assistance efforts. States will be able to use the data for internal management and program improvement.

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 annual AT Act data collection is submitted electronically as an online survey. Using RSA's Management Information System (MIS), states complete their annual reports via the Internet by entering data into fields, choosing from drop-down menus, selection via "check boxes," and narrative. Paper versions of the plan are neither required nor accepted unless there is a technological barrier to use the online system. The MIS will serve not only as the venue for submitting the data electronically, but also functions as a database to allow both RSA and the public to access information.

Since a web-based data collection system is currently in place, a proposed update to the system will be implemented based upon the instrument submitted for review. The paper version of the instrument translates directly into a web-based format; throughout the document there are numerous references to how certain sections and items are used in the electronic system. Upon OMB approval of the paper version, the web-based application for use by the states will be implemented by ED at RSA through the MIS. Once updated, the system will meet or exceed requirements for accessibility of Section 508 of the Rehabilitation Act of 1973, as amended (*The Act*), the Federal Information Security Management Act (FISMA), and other applicable statutes and regulations, and industry standards. The entities completing the annual data report already use the MIS for other purposes, such as completing SF-425s, and State Plans for AT (OMB No. 1820-0664).

This web-based system allows all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands and territories to enter and submit their data electronically at their convenience on an ongoing basis. Where appropriate, the system automatically

generates totals and does other automatic calculations, saving time and reducing the chance of mathematical errors.

RSA will have immediate access to the information submitted, allowing RSA to identify which grantees have submitted their data. This access will allow RSA to generate reports, even on partial data, as requested by Congress or others. States will have similar access to their data for management purposes.

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 proposed data collection is intended to reduce duplication for states that have a single State Plan for AT. Currently, data collected on State Financing Activities (see pages 4 through 15 of the instrument) is duplicative of information collected under title III of the Assistive Technology Act of 1998, as in effect prior to the 2004 amendments. Under a separate funding authority, title III provided for alternative financing programs (AFPs) that operate in perpetuity. Thirty-three states received AFP grants funded under title III. This program has its own data collection requirements and its own web-based data collection instrument (OMB No. 1820-0662) in RSA's MIS.

Because Section 4 of the AT Act includes AFPs as a form of state financing activity, many states have incorporated their existing title III AFP into their State Plan for AT. The revised data form would allow states that have incorporated their Title III funded AFP program loans into their State Plan for AT to only report this data once. If all AFP loans in the state are reported in the State Grant for AT Annual Progress Report (RSA-572) under State Financing, the AFP specific data elements that were in the separate AFP would be complete and no other reporting is necessary. (Specifically the RSA-662 AFP Progress Report does not need to be submitted). This is a significant reduction in burden for States that include an AFP in their State Plan for AT, since the data would not need to be reported separately.

However, a single data collection instrument cannot capture the entire universe of data, or entities needing to report that data, for both title III and Section 4 because:

- (a) the data collection requirements of section 4 and Title III are similar but not the same; and
- (b) not all states have both title III and section 4 grants, and, when a state does have both grants, both grants do not always go to the same agency.

Other than the duplication of title III data described above, this data collection instrument is unique to section 4 of the AT Act and does not duplicate other data collection efforts. When possible, terminology, definitions and other features of this

instrument are aligned with data collection instruments already used by AT Act grantees for other purposes.

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.

This information collection does not involve small businesses and will not have a significant impact on substantial numbers of 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.

If this information is not collected, neither RSA nor states can fulfill their reporting obligations under the AT Act. Those obligations are annual, so the data collection cannot occur less frequently than annually.

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 data collection is consistent with guidelines set forth in 5 CFR 1320.5, and requires no special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

The revision of the annual AT Act data collection instrument was published in the Federal Register for a 60-day solicitation of comments period. A 30-day response to comments notice followed the initial 60-day Federal Register notice; RSA received one public comment during the 60-day comment period, the comment and RSA response are attached.

The Center for Assistive Technology Act Data Assistance (CATADA), the project responsible for coordinating the development of the current instrument, conducted a face-to-face meeting in July 2012 in Washington, DC and presented a review of all data elements, soliciting suggestions for revisions from representatives of the State Grant for AT programs of various types at the conference. CATADA sent an email to all grantees in August 2012 that included an initial draft of proposed data element revisions and requested feedback from the AT grantees. CATADA facilitated a conference call for grantees in October 2012 that highlighted suggested revisions to the instrument and again asked for feedback. The State Grant for AT programs provided suggestions for general revisions of the data collection system and a conference call was facilitated in November 2012 to remind grantees about providing more feedback to the instrument. RSA-CATADA facilitated a teleconference in March 2013 to review proposed revisions and additional grantee feedback prior to the May 2013 face-to-face presentation in Bethesda, MD on the proposed revisions to the instrument. RSA staff participated in all

meetings. The current instrument takes the suggestions and feedback of the State Grant for AT programs into account.

The instrument submitted for review is an updated revision and renewal of the current instrument. CATADA and State Grant for AT representatives agreed that the instrument in this package captures the data reporting requirements of the states funded under the AT Act.

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

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There are no assurances of confidentiality for individual consumers receiving services from a State Grant for AT programs, the states will not report information that identifies individual consumers. States will provide anecdotes about the effect of their programs on individual consumers, but states are instructed to write anecdotes in a manner that ensures their anonymity. All other data provided is reported in the aggregate.

The web-based system used for this instrument will not allow public access to the reporting instrument for data entry, and states will have access to their data only, so they will not be able to see or manipulate data of other states. Individual state reports will be kept confidential until they have been finalized by the state and accepted by RSA.

Once a report has been finalized by the state and accepted by RSA, access to the aggregated state-specific and national data will be available to the public via the Internet. However, while the public will be able to view the data, they will not be able to alter the data. States will be advised that their data will be available to the public in this manner.

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.

No questions included in the data collection instrument are considered sensitive.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 item 16 of IC Data Part 1.
- 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.

We estimate that there will be 56 respondents with an estimated 402 hours needed to complete for a total annual burden of 22,512 hours. This information collection has 3 pieces:

- (A) A Web-based system that collects data from states.
- (B) A performance measure survey that states collect from individuals
- (C) A customer satisfaction survey that states collect from individuals.

(A) Fifty-six grantees report to the Department using the Web-based data collection system. A workgroup of grantees estimated that the average amount of time required to complete all responses to the data collection instrument is 190 hours annually. The estimated response burden includes time to review the instructions, gather existing data, and complete and review the data entries. These estimates are based on the experience of staff who implements these programs at the state level. This is based on a projected equal burden resulting from the balance of elimination of some data elements and addition of others as follows:

- Deletion of Active Loan Number and Active Loan amount in State Financing Activities
- Deletion of IT/Telecommunications performance measures from Device Loan and Device Demonstration Activities

- Addition of IT/Telecommunications performance measure to Training Activity
- Addition of Access performance measure to Device Loan (non-decision making) Activities

In addition, we project that clean-up and clarification of data elements will support no change in data burden estimates.

(B) The fifty-six grantees ask consumers to complete surveys that provide information on their performance related to the state's measurable goals. Responses from states indicated that the average state will ask for this information from 1700 consumers at 5 minutes per consumer, for a total of 141 hours annually.

(C) The fifty-six grantees ask consumers to complete customer satisfaction surveys. Responses from states indicated that the average state asks for this information from 1700 consumers at 2.5 minutes per consumer, for a total of 71 hours annually.

Therefore, the combined burden of completing the data collection instruments and related surveys is 402 hours (190 + 141 + 71) per grantee. In discussions with program directors, it was agreed that at least one staff person would need to dedicate one full working day each week to all three data collection instruments, with an additional full week of data entry at the end of each reporting cycle. With 56 grantees responding, this brings the national burden to 22,512 hours annually.

Program staff also estimated the average recordkeeping burden at 22 hours per year for a total of 1,232 hours. Therefore, the total annual reporting and data collection burden would be 23,744 hours.

Assuming an average hourly cost of \$30 per hour for staff members who complete the instrument, the cost burden for individual grantees is estimated to be \$12,060 annually, and the total cost of data collection for the 56 grantees is estimated to be \$675,360 annually. Using the same rate, the cost for recordkeeping is estimated at \$660 per state or outlying area, \$36,960 total for all states and outlying areas, resulting in a total reporting and recordkeeping cost of \$712,320 per year.

The average hourly cost of \$30 represents the average, fully-loaded wage rate, i.e., includes pre-tax cash wages, fringe benefits and overhead support for several different classes of labor ranging from clerical to managerial labor and accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional and managerial) are expected to expend.

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.

Total Annualized Capital/Startup Cost	: \$.00
Total Annual Costs (O&M)	: .00
Total Annualized Costs Requested	: \$.00

No costs are incurred by respondents other than those specified in item 12. There are no capital costs or equipment purchases necessary. Respondents only need to have a computer and internet access to complete the data collection 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.

Section 6(b)(5) of the AT Act requires that RSA award a grant, contract, or cooperative agreement to an entity to assist states with data collection and reporting. The Center

for Assistive Technology Data Assistance, CATADA, the entity that received this award for the start of FY 2011, is responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with writing the annual report to Congress based on data submitted into the MIS. Subject to appropriations, RSA anticipates providing approximately \$250,000 each year for five years to the recipient to perform the above data collection and reporting activities for the State Grant for AT programs, as well as data collection and reporting system training, technical assistance, and analysis for title III AFPs, OMB 1820-0662. The estimated annualized cost to the Federal government for the State Grant for AT portion of the cooperative agreement is \$197,500.

In addition, RSA employs one management and program analyst at the GS-14 level and one program specialist at the GS-13 level with the responsibility for the administration of grants funded under the AT Act, including this data collection. These employees are housed in the Service Programs Unit, which is overseen by a Unit Chief and Director. RSA staff dedicates a percentage of their time to this data collection, creating an additional cost. RSA also employs an information technology specialist in the Program Support Staff Unit, who built the current State Grant for AT data collection system in the MIS and will update the system upon OMB approval of this instrument. The development and limited maintenance of this instrument in the MIS is an additional cost associated with the State Grant for AT data collection. The above staff dedicates a percentage of their time to this data collection, therefore the estimated annualized cost to the Federal government for RSA staff time is \$66,890.

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

This information collection includes an adjustment decrease of 4 burden hours from 406 hours to 402 hours per state AT program for a total reduction burden of 224 hours. The burden hour reduction is a result of a reduction in the due to the updates to the instrument noted below. This is a program change and consistent with the IC Data Part I Form. The proposed State Grant for AT IC package will result in a reduction in burden, but not a reduction in the number of respondents.

State AT Data Collection Instrument List of Revisions

The following identifies revisions to the Data Collection Instrument by page number for the State Grants for Assistive Technology Annual Progress Report.

Page 8 - Active Loans and Active Loan Amount

Reason for change: This data element is consistently reported incorrectly and needs to be simplified. The way it is currently reported is not applicable to some states given the loan structure they use and creates inequitable application to grantees.

Description of change: The two active loan data elements have been deleted. Financial loan programs will only report the current number of loans that defaulted during the reporting period and the net loss of those loans as have been reported previously. In addition, the instructions have been clarified to allow financial loan programs to “defer” reporting a default to the next fiscal year if they think they can “recoup” some of the loan amount during the next 12 months and thus would have a more accurate net loss amount to report. This is simply acknowledging how many states already report defaults.

Page 11 and 12– Description of Individuals Excluded from Performance Measure

Reason for change: There has been considerable confusion about when it is legitimate for individuals to be excluded from the performance measure. Additional description is needed to support review and data consistency across grantees.

Description of change: A text box has been added that must be completed when individuals are excluded from the performance measure (a positive number is reported in line 2.D on page 11 and on page 12).

Page 13 – Anecdotes (State Financing)

Reason for Change: To streamline the narrative text entered for anecdotes.

Description of change: All of the text entry places for anecdotes will have a 1000 word limit for the text that will be pulled via the MIS ad hoc system. A place has also been added for grantees to indicate if they have a picture to accompany the anecdote narrative entered. These changes have been made for all anecdote sections

Page 17 - Description of Individuals Excluded from Performance Measure

Same change as above, text box must be completed when individuals are excluded from the performance measure (a positive number is reported in line A.F on page 17).

Page 16 – Reuse Open-ended Loans

Reason for Change: To clarify the difference between reuse open-ended loan and short term device loan.

Description of change: Language was added to support better understanding of the distinction between reuse open-ended loan (generally a device is placed with a consumer on an extended basis via loan rather than ownership transferring to the consumer) and short term device loan (generally a short-term loan period and transfer of ownership is never a consideration.)

Page 19 – Anecdotes (Reuse)

Same change as above.

Page 22, 24 & 25 – Device Loan Performance Measure Expansion

Reason for Change: The current Access performance measure only applies to device loans made for a decision-making purpose which leaves many device loans without any performance measure reported.

Description of change: To include more device loans in the performance measures the acquisition performance measure was applied to the other device loan purposes: those

made for the purpose of short-term accommodation, using the device during a repair period or while waiting for funding, and training or other personnel development activities. The device loan section has been revised to include reporting of both access and acquisition performance measures as appropriate given the purpose of the loan. The acquisition performance measures for device loans will be included in the overall acquisition performance measure percentages (along with state financing and reuse).

Page 23 & 24 – Deletion of IT/Telecommunications from Access Performance Measure

Reason for Change: The inclusion of IT/Telecommunications as an area of the access performance measure was a consistent problem because it was not comparable to the other areas of education, employment and community living that are environments of AT use. IT/Telecommunications is actually more of a type of AT but is included in the AT Act so a performance measure is required for that area.

Description of change: The IT/Telecommunications area has been deleted from the access performance measure and instead a new performance measure has been established for the IT/Telecommunications area within the Training activity (see below).

Page 23 & 24 – Anecdotes (Device Loan)

Same change as above.

Page 28 – Anecdotes (Device Demo)

Same change as above.

Page 30 – Overall Performance Measure Tables

Reason for Change: Many grantees have total performance measure numbers within areas (Education, Employment, etc.) that are too small to calculate valid percentages or are zero which mean no performance measure can be calculated at all.

Description of change: To address the small N issue, the data instrument has been revised to include two new overall performance measure tables which use the overall total performance measure numbers instead of each area (Education, Employment, etc.) to compute the performance measure ratios. These tables will be auto-populated from the individual performance measure data reported by activity and will allow grantees to see their access and acquisition performance measure percentages as they submit their Annual Progress Report (572) rather than waiting for the State Plan to be auto-populated. (Some entities who implement the program and do the data reporting do not complete the State Plan and as a result do not have direct access to the performance measure calculations.)

Page 34 – Training Narratives

Reason for Change: To streamline the narrative text entered for training data.

Description of change: All of the text entry places for description of innovation or high impact training and transition training will have a 1000 word limit for the text that will be pulled via the MIS ad hoc system. Additional text may be entered but will not be displayed in a data download.

Page 34 – Performance Measure for IT/Telecommunications Training

Reason for Change: Because it is highly unlikely that the AT Act will be reauthorized or amended in the near future, an alternative for addressing the statute requirement for a performance measure for IT/Telecommunications was needed.

Description of change: A performance measure has been developed for Training in the topical area of IT/Telecommunications. Data on training provided in this topic area is already reported. A performance measure has been added for training provided in the topical area of IT/Telecommunications and will be collected from the individuals reported as participants in those trainings.

Page 37 – Technical Assistance Narratives

Reason for Change: To streamline the narrative text entered for technical assistance data.

Description of change: All of the text entry places for description of innovation or high impact technical assistance and transition technical assistance will have a 1000 word limit for the text that will be pulled via the MIS ad hoc system. Additional text may be entered but will not be displayed in a data download.

Page 41 & 42 – Leveraged Funding (Activities not reported previously)

Reason for Change: To clarify the difference between activities reported in Section A and B.

Description of change: Revisions have been made in the narrative description of leveraged funding that should be reported in Section B to clarify the difference between the two Sections.

Forms:

Edited Acquisition Performance Measure data collection form (SFA and Reuse) – p. 45
Added new Device Loan Acquisition Performance Measure data collection form – p. 46
Added new Training IT/Telecommunications Performance Measure data collection form–p 46

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.

The aggregate, national data derived from this collection will be used to create an annual report to Congress. The format of this report responds to the requirements of Section 7(d) of the AT Act.

Because states receive grants every year, there is no end date for the reporting requirements. States will remain on a set reporting cycle, with the period beginning October 1 and ending September 30 each year. The due date for the completed annual data reports is December 31 and the deadline for RSA approval of the collection is May

31 of each year. Approved annual data reports will be posted on RSA's website. No complex analytical techniques will be used.

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.

RSA will display the expiration date for OMB approval of the information collection. See the Paperwork Burden Statement document.

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

There are no exceptions to the certification statement.