

**SUPPORTING STATEMENT**  
**Protection and Advocacy Systems**  
**Narrative Annual Report**  
**0985-0028**

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

Public Law 107-252, Help America Vote Act of 2002, section 291 (42 USC 15461) address the use of funds received under the Help America Vote Act (HAVA), P.L. 107-252, Title II, Subtitle D, Section 291, Payments for Protection and Advocacy Systems (P&As) used to provide education, training and assistance to individuals with disabilities that will promote their participation in the electoral process. P&As work at the state level to protect individuals with developmental disabilities by empowering them and advocating on their behalf. The HAVA program support their efforts in ensuring the full participation in the electoral process for individuals with disabilities, including registering to vote, casting a vote, and accessing polling places. HAVA covers 55 P&As in the United States and its territories, and each is independent of service-providing agencies within their states/territories including the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, and Virginia Islands.

Protection and Advocacy Systems (P&As) are requested to submit an annual report as noted under 42 U.S.C. 15461 of the Help America Vote Act of 2002. An annual report format has been established by the Administration on Intellectual and Developmental Disabilities (AIDD). The format is based on the Protection and Advocacy Agency's plan to address the seven mandated areas outlined in the Help America Vote Act (HAVA) Section 291. The areas include full participation in the electoral process; education, training and assistance; advocacy and education around HAVA implementation efforts; training and education of election officials, poll workers and election volunteers regarding the rights of voters with disabilities and best practices; assistance in filing complaints; assistance to State and other governmental entities regarding the physical accessibility of polling places; and obtaining training and technical assistance on voting issues.

A copy of section 291 is attached.

**2. Purpose and Use of Information Collection**

By Federal statute, the Help America Vote Act (HAVA) of 2002, Public Law 107-252, Section 265 (b), Reports, 42 U.S.C. 15461) the governing

agency is mandated to submit a report to the Committee on House Administration of the House of Representatives and the Committee on Rules and Administration of the Senate. As a result of the mandate, each State Protection & Advocacy (P&A) System receiving funds and activities carried out under HAVA Section 291 are requested to prepare an annual report in accordance with the grant terms and conditions. The purpose of the annual report is to obtain information from each state/territory to use in the Congressional report submitted by the Secretary of the U.S. Department of Health and Human Services.

**3. Use of Improved Information Technology and Burden Reduction**

The Administration on Intellectual and Developmental Disabilities (AIDD) has no funding under the Developmental Disabilities (DD) Act to support an electronic reporting system for the Protection and Advocacy (P&A) Narrative Annual Report.

**4. Efforts to Identify Duplication and Use of Similar Information**

There have not been any formal efforts to identify duplication because there are no similar programs collecting information regarding the Help America Vote Act (HAVA) program.

**5. Impact on Small Business or Other Small Entities**

The information collected does not involve, nor result in assignment of burden to any small business.

**6. Consequence to Collecting the Information Less Frequently**

No accountability of how HAVA funds are being used.

**7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances governing the collection of data.

**8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

A 60 day Federal Register notice was published in the *Federal Register* On March 31, 2015, Vol. 80; pg. 17053. There were no public comments.

**9. Explanation of Any Payments or Gifts to respondents**

No payments or gifts to respondents are planned.

**10. Assurance of Confidentiality Provided to Respondents**

This information collection does not require an assurance of confidentiality.

**11. Justification for Sensitive Questions**

Not applicable

**12. Estimates of Annualized Burden Hours and Costs**

The following is the hour of burden estimate for this information Collection for the Protection and Advocacy Systems Narrative Annual Report:

No. of States	No. of Responses per state	Average Burden hours per state	Total Hours
55	1	20	1,100

The current approximation of annual burden is 5 hours for four (4) working days which equals 20 hours. The total estimated burden hours for the P&As are 1,100.

This table should calculate for section 12 B as:

The annualized cost of the hour burden, expressed in dollars is:

Average Cost/hour	Average Burden hours/state	Average Annual cost/state	Total Annual Cost
\$35	20	\$700	\$38,500

**13. Estimate of Other Total Annual Cost Burden to Respondents and Record Keepers**

There is no annual burden to respondents resulting from the collection of information for the P&As annual report.

**14. Annualized Cost to the Federal Government**

This computation is based on an estimated \$35 per hour for the efforts of a Program Specialist. The estimated hourly rate includes fringe benefits.

Program specialists will devote an annualized estimate of 20 hours every year to organize and review the annual reports and to generate analysis of the information.

Total Estimated Federal Costs is \$700

**15. Explanation for Program Changes or Adjustments**

Not applicable

**16. Plans for Tabulation and Publication and Project Time Schedule**

Not applicable

**17. Reason(s) Display of OMB Expiration Date is Inappropriate**

Not applicable

**18. Explanation to Certification for Paperwork Reduction Act Submissions**

Not applicable

**B. Statistical Methods (used for collections of information employing statistical methods)**

**1. Respondent Universe and Sampling Methods**

Not applicable

**2. Procedures for the Collection of Information**

Not applicable

**3. Methods to Maximize Response Rates and Deal with Nonresponse**

Not applicable

4. **Test of Procedures or Methods to be Undertaken**

Not applicable

5. **Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data**

Not applicable