

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Annual Protection and Advocacy for Assistive Technology (PAAT) Program Performance Report will be used to analyze and evaluate the PAAT Program administered by eligible systems in states. These systems provide services to eligible individuals with disabilities to assist in the acquisition, utilization, or maintenance of assistive technology devices or assistive technology services. ACL uses the form to meet specific data collection requirements of Section 5 of the Assistive Technology Act of 1998, as amended (AT Act). PAAT programs must report annually using the form (copy attached), which is due on or before December 30 each year.

The current version of the form is scheduled to expire on July 31, 2015. ACL has made no substantive changes to the form, but has changed references from RSA to ACL to reflect the transition of the program to ACL.

2. Purpose and Use of Information Collection

The Annual PAAT Performance Report will enable ACL to furnish the President and Congress with data on the provision of protection and advocacy services and has helped to establish a sound basis for future funding requests. Data from the form have been used to evaluate the effectiveness of eligible systems within individual states in meeting annual priorities and objectives. These data also have been used to indicate trends in the provision of services from year-to-year.

3. Use of Improved Information Technology and Burden Reduction

ACL will accept the PAAT Performance Report through an electronic, web-based ACL Program Performance Reporting System. All 57 PAAT programs will submit the form using this method. References in the previous PAAT reporting form to the Department of Education's management information system (MIS) have been deleted.

4. Efforts to Identify Duplication and Use of Similar Information

The Annual PAAT Performance Report provides information on the number of individuals with disabilities currently receiving protection and advocacy services authorized by Section 5 of the AT Act. No similar information is available from other data sources.

5. Impact on Small Business or Other Small Entities

Most respondents are not-for-profit organizations. Respondents and the National Disability Rights Network (NDRN), a national organization representing the respondents were included in the initial development of this collection of information. This was done in an effort to ensure that the information requested could be provided with a minimal burden on the respondents.

6. Consequences of Collecting the Information Less Frequent Collection

Because ACL uses the information obtained by this collection in preparing its annual report to the President and Congress, current data on protection and advocacy services must be made available by eligible systems each year.

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

There are no special circumstances that require this information collection to be conducted in any manner listed above.

8. Comments in response to the Federal Register Notice

A 60 day Federal Register notice was published on Tuesday, June 9, 2015 (Volume 80, pg. 32570) No comments were received.

9. Explanation of any Payment/Gift to Respondents

There is no payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

Information provided is not of a confidential nature.

11. Justification for Sensitive Questions

This report contains no questions of a sensitive nature.

12. Estimated Annualized Burden Hours (Total Hours & Wages)

	Annual Burden
Number of respondents	57
Frequency of response	1
Total annual responses	57
Hours per response	16.0
Total hours	912
Cost per hour	\$33
Total cost	\$30,096

ACL has estimated the time required for each respondent to complete the form, so that the estimate is consistent with that used in connection with similar reporting instrument to be the same as RSA's previous estimates because no substantive changes were made to the form since it transferred from Department of Education. RSA conducted a field test of nine respondents to the Annual PAAT Performance Report during its development and found that on average respondents completed the form within 16 hours. (Please see attachment titled "IC Burden Analysis Table")

To calculate a \$33 cost burden per hour, ACL assumes the hourly rate of a senior management staff member at a nonprofit with annual salary of \$66,000, which falls within nationally reported averages for grants and executive administration.

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Captial Costs

There are no additional cost to the respondents.

14. Annualized Cost to the Federal Government

Annual cost to federal government	85.5 hours x \$38/hour	\$3,249.00
Annual federal computer costs		<u>\$ 500.00</u>
Total cost to federal government		\$3,749.00

ACL posits it will take 85.5 hours to review the 57 PPRs, assuming 1.5 hours per report. \$38 is the hourly rate of a G-12 Program specialist

15. Explanation for Program Changes or Adjustments

This submission requires no changes to the burden for hours and costs included in current OMB inventory.

16. Plans for Tabulation and Publication and Project Time Schedule

Reports are due to ACL within 90 days following the end of the fiscal year (approximately December 31 of each year). Data reported are evaluated and transmitted to the President and Congress in the Annual Report prepared by the Commissioner.

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

We are not seeking approval to not display the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.