

THE SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. *Circumstances Making the Collection of Information Necessary*

Section 104 (a) (42 USC 15004) of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act of 2000) directs the Secretary of Health and Human Services to develop and implement a system of program accountability to monitor the grantees funded under the DD Act of 2000. The program accountability system shall include the National Network of University Centers for Excellence in Developmental Disabilities Education, Research, and Service authorized under Part D of the DD Act of 2000. In addition to the accountability system, Section 154 (e) (42 USC 15064) of the DD Act of 2000 includes requirements for a UCEDD Annual Report. The Annual Report Template appears in Attachment C.

Essentially, the DD Act of 2000 states that the UCEDD Annual Report should contain information on progress made in achieving the projected goals of the Center for the previous year, including (1) the extent to which the goals were achieved; (2) a description of the strategies that contributed to achieving the goals; (3) to the extent to which the goals were not achieved, a description of factors that impeded the achievement; and (4) an accounting of the manner in which funds paid to the Center under this subtitle for a fiscal year were expended; information on proposed revisions to the goals; and a description of successful efforts to leverage funds, other than funds made available under the DD Act of 2000.

In addition, the DD Act of 2000 states that grantees must also report on data collected regarding the following consumer satisfaction with the advocacy, capacity building, and systemic change activities initiated by the UCEDD; the extent to which the UCEDD's advocacy, capacity building, and systemic change activities provided results through improvements; and the extent to which collaboration was achieved in the areas of advocacy, capacity building, and systemic change.

The National Network of University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDDs) is a discretionary grant program. It supports the States in the operation and administration of a national network of UCEDDs that are interdisciplinary education, research, and public service units of universities or public or not-for-profit entities associated with universities that engage in core functions (e.g., provision of interdisciplinary pre-service preparation and continuing education of students and fellows; provision of community services, including training or technical assistance; conduct of research; and dissemination of information) addressing, directly or indirectly, one or more of the areas of emphasis (e.g., quality assurance, education and early intervention, child care, health, employment, housing, transportation, recreation, and other services available or offered to individuals in a community, including formal and informal community supports, that affect their quality of life).

Currently, UCEDDs engage in four broad tasks: conducting interdisciplinary training,

promoting exemplary community service programs and providing technical assistance at all levels from local service delivery to community and state governments, conducting research, and disseminating information to the field.

Currently, there are 67 UCEDDs throughout the United States with at least one or more in every State and Territory, as mandated. Public Law No. 108-447, the Consolidated Appropriations Act of 2005, supports the expansion of the national network of UCEDDs.

2. Purpose and Use of the Information Collection

According to Section 105 (42 USC 15005) of the DD Act of 2000, the information provided in the Annual Reports from the UCEDDs will be combined with information reported by the State Developmental Disabilities Councils and Protection and Advocacy agencies to develop and submit at least once every 2 years to the President, Congress, and the National Council on Disability a report that describes the goals and outcomes of programs supported under the DD Act of 2000.

In addition, the information derived from data collection activities will be used by multiple recipients for multiple purposes:

- (1) As a tool for UCEDD grantees to measure and report on progress in reaching goals and identify areas for which revisions are indicated;
- (2) To enhance the Federal project officers' monitoring of UCEDD progress in reaching projected outcomes;
- (3) To provide a set of standardized performance measures that will yield a national portrait of UCEDD program impact;
- (4) To streamline the Administration for Children and Families and the Department of Health and Human Services reporting to Congress on accomplishments and progress toward reaching program goals.
- (5) For Congress and the Administration in making funding and appropriation decisions with regard to the UCEDD program.

3. Use of Improved Information Technology and Burden Reduction

The Administration for Intellectual and Developmental Disabilities (AIDD) has built upon a successful web-based system entitled the National Information Reporting System (NIRS) developed by the Association for University Centers on Disabilities (AUCD) and uses this information technology system for collecting data. The instrument that

accompanies this Supporting Statement will guide the development of items to be included in NIRS for reporting purposes.

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

With regard to the UCEDD Annual Report requirement, there is no similar information available. Individual UCEDDs collect annually data on some of the information being requested; however, all UCEDDs have not produced material in a uniform format and in response to the requirements of the DD Act of 2000.

Moreover, because the collecting and reporting on the data being requested is based on the area(s) of emphasis chosen by each UCEDD and because these in turn were required to reflect particular needs of the state in which the UCEDD is located, duplication is unlikely.

UCEDDs will use the Annual Report template to report on Government Performance and Results Act (GPRA) measures. In the case of the GPRA measures, ADD has coordinated data collection efforts with the Maternal and Child Health Bureau (MCHB). MCHB funds Leadership Education in Neurodevelopmental and Related Disabilities (LEND) grants at 34 of the 67 UCEDDs in the Network. This overlap in funding could lead to duplication in the collection of data. To avoid this potential for duplication, ADD worked with AUCD and MCHB to identify common GPRA measures that could apply to both programs. The GPRA measures that appear on the Annual Report template for the UCEDD program reflect two measures that are currently used by MCHB for the LEND program.

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

The information to be collected does not involve or result in assignment of burden to any small business or other small entity. The data will be collected from 67 UCEDD grantees. UCEDDs as defined, in Section 153 [42 USC 15063] of the DD Act of 2000, are interdisciplinary education, research, and public service units of universities, or public or nonprofit entities associated with universities that engage in four core functions: interdisciplinary pre-service education, community service training, research and information dissemination and address either directly or indirectly one or more areas of emphasis.

6. *Consequences of Collecting the Information Less Frequently*

Section 154(e) of the DD Act of 2000 requires annual reporting. Less frequent collection of data to be included in reports would violate statute. Furthermore, the data to be provided will enable timely monitoring of grantee activity and revision of goals if projected goals and outcomes are not being met.

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

There are no special circumstances requiring the collection of information 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;
- In connection with a statistical survey, that is not designed to produce valid and reliable results that 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 that this information will be kept private to the extent allowed by law 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

There are special circumstances requiring the collection of information to be conducted in a manner:

- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years. The proposed GPRA measures require that the UCEDD program survey their former trainees at 1, 5, and 10 years post-training. The UCEDDs will have to maintain confidential records for their trainees for more than 3 years to ensure they are following the data collection schedule. The records to be maintained by the UCEDD will contain information about an individual's education, employment history, and demography. Individual records will be protected through a coding system.
- Requiring respondents to submit confidential information, however, there will be procedures to protect the information and will be kept private to the extent permitted by law. Information gathering techniques are to be conducted without inclusion of names or other identifying information of the respondents. Responses are voluntary and confidential information is not to be recorded. Respondents are to be assured that the information they provide is confidential and that their answers will be used for the purpose for which they were collected. In keeping with agency practices with respect to cultural competence issues, literacy, and visual or auditory ability, alternative formats will be made available.

Finally, there are special circumstances with the regard to the regulations for the DD Act of 2000. The regulations are currently in departmental clearance. Upon approval, the Notice of Proposed Rulemaking will be forwarded to OMB. Information in the pending rulemaking regarding the UCEDDs annual reporting requirements are consistent with the materials contained within and that accompany this Supporting Statement.

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

The Federal Register notice soliciting comments for a 60-day period was published on June 2, 2016 in Volume 81, page 35361. No comments were received for the 60 day Federal Register notice.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are to be implied or offered to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information will be kept private to the extent allowed by law before collection of data for the UCEDD Annual Report. The information collected will not be used for any purposes other than statistical and that any information disclosed will not be not identifiable.

The proposed Annual Report template includes measures of improvement and consumer satisfaction. The data for these measures will be collected as part of evaluations of formal trainings, workshop presentations, provision of services, and products. AIDD will instruct the UCEDDs to implement the following steps in the collection of information that will ensure that it will be kept private to the extent allowed by law of the information collected:

- In conducting the evaluative activities, the UCEDDs will ensure the respondents' that the information will be kept private to the extent allowed by law in a variety of formats, including oral and written statements. If UCEDDs use written survey techniques, a standard written statement about information being kept private to the extent allowed by law must be included. All statements about privacy of information will explain that responses are voluntary, confidential information will not be shared with others, and that answers will be used for the purpose for which they were collected. In keeping with agency practices with respect to cultural competence issues, literacy, and visual or auditory ability, alternative formats will be made available.
- When recording information collected through the various evaluative activities, the UCEDDs must maintain a coding system that protects the identity, if known, of the respondent. Measures should be taken to ensure that the information will be kept private to the extent allowed by law of files, including the use of locked file cabinets and passwords on computers where data is kept.
- None of the data that is entered into NIRS will be confidential. No personally identifiable information should appear in NIRS.

11. Justification for Sensitive Questions

In the collection of information for the Annual Report, UCEDDs will not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other

matters that are commonly considered private. In addition, respondents will not be asked questions related to community activities of a character which indicate political affiliation and attitudes; mental and psychological problems potentially embarrassing to respondents; sex behavior and attitudes; religion and indicators of religion; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; and records describing how an individual exercises rights guaranteed by the First Amendment.

12. *Estimates of Annualized Burden Hours and Costs*

Based on UCEDD reporting experience, current data and reporting efforts constitute approximately 1,412 burden hours per grantee for a total of 94,604 hours. The estimated burden hours is the result of data collected by the UCEDD technical assistance provider for the previous data collection and grantee experience in obtaining and providing data. The table below outlines the estimate for the hours of burden associated with the collection of information.

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
UCEDD Annual Report	67	1	1,412	94,604

Estimated Total Annual Burden Hours: 94,604

The estimates in the following table were calculated using the mode for the hourly rate paid to individuals performing each task, a mean cost by task across UCEDDs, and a fringe rate of 100%. The table outlines the estimated annual cost associated with the burden.

CURRENT ANNUAL EFFORT	# Hours Dedicated to Task		Hourly Rate Of Task		Totals	
	Mean	Range	Mean	Range	Average Effort Per	Across the Network

					Center	(Average Effort x 67 Centers)
Design of data collection tools ¹	23	1-50	44.05	\$24-65	\$1013.15	67,881
Staff training on data collection and entry ²	60	20-110	50.88	\$29-68	\$3,052.8	204,538
Data gathering & verifying ³	759	200-2,184	25.52	\$16-41	\$19,734.4	1,322,178
Data entry & cleaning ⁴	570	380-820	25.52	\$16-41	\$14,546	974,582
Subtotal	1,412	728-2,706			\$38,346	\$2,569,182
Fringe Rate 100%					\$38,346	\$2,569,182
Total Current Burden					\$76,692	\$5,138,364

1. Computer Systems Analyst
 2. Training and Development Manager
 3. Computer User Support Specialist
 4. Computer User Support Specialist
- Rates based on Bureau of Labor Statistics for comparable occupations

The above figures related to the percentage of hours dedicated to different tasks were developed from information gathered by the UCEDD technical assistance provider for the previous data information collection request. The data collection has not changed, so the table assumes no change to the estimated breakdown among categories. The cost figures have been updated to reflect changes in salary since the last information collection request. ACL has revised the table to include salary data from the Bureau of Labor Statistics for the updated hourly salary amounts using the categories indicated in the footnotes to the table.

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

There are no out of pocket expenditures resulting from this collection of information.

14. Annualized Cost to the Federal Government

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

Program specialists will devote an estimated 80 hours per year to review, analyze, and report on the information provided. With 67 grants currently being monitored, the estimated annualized cost would be $67 \times 80 = 5360$ hours \times \$35/hour = \$187,600.

15. Explanation for Program Changes or Adjustments

There are no changes to the data collection forms. .

16. Plans for Tabulation and Publication and Project Time Schedule

Results from the collection of information will be used by AIDD to monitor an individual UCEDD's performance using measurable goals; measures of improvement, consumer satisfaction, and collaboration; and GPRA measures. This individual monitoring activity will not be published.

Data collected from across the UCEDDs on the measures of improvement, consumer satisfaction, and collaboration and the GPRA measures will be tabulated and reported in aggregate form in bi-annual reports to Congress and in annual GPRA reports. The timeline and tabulation procedures are outlined below:

- Data will be collected throughout the UCEDD fiscal year (July 1 to June 30). All data must be entered into the NIRS system by June 30. No data will be accepted after that date.
- Reports are due 30 days after the close of the UCEDD fiscal year (July 30).
- AIDD will tabulate the measures of improvement and consumer satisfaction data once the 67 UCEDDs have submitted Annual Reports. Raw data will be stored in a data file (e.g., Microsoft excel, Microsoft access) for each measure of improvement and consumer satisfaction. Once all data has been entered, AIDD staff will tabulate the measures of improvement and calculate overall percentages for the measures of consumer satisfaction.
- AIDD will also tabulate the GPRA measure by entering raw data for the GPRA measures into a data file (e.g., Microsoft excel, Microsoft access). AIDD staff will calculate the overall percentages for the GPRA measure.
- The tabulations and calculations of the data will be completed by November 30.

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

Not Applicable

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not Applicable

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

1. Respondent Universe and Sampling Methods
2. Procedures for the Collection of Information
3. Methods to Maximize Response Rates and Deal with Nonresponse
4. Test of Procedures or Methods to be Undertaken
5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data