

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Children's Health Act of 2000, 42 U.S.C. Section 300d-53(h), requires the Protection and Advocacy (P&A) System in each State to annually prepare and submit to the Secretary a report that includes documentation of the progress they have made in serving individuals with traumatic brain injury. In order to comply with this requirement, each PATBI must annually prepare a Program Performance Report (PPR) that describes the activities and accomplishments of the system during the preceding fiscal year.

The Administration for Community Living (ACL) is proposing the creation of a new PATBI Annual Program Performance form (PPR) to meet this requirement. The form will allow recipients the opportunity to submit yearly activities and progress and performance data as required in the statute. It will also allow federal reviewers to analyze patterns more readily, barriers to achievement of program goals, and overall program performance.

This will be an ongoing annual data collection.

2. Purpose and Use of the Information Collection

The annual program performance report (PPR) is reviewed by federal staffs for compliance and outcomes. Information in the PPRs is analyzed to create a national profile of programmatic compliance, outcomes, and goals and priorities for P&A Systems for tracking accomplishments, goals and to formulate areas of technical assistance related to compliance with Federal requirements. Information collected in the unified report will inform AIDD of trends in P&A advocacy, facilitate collaboration with other federally-funded entities, and identify best practices for the efficient use of federal funds.

Additionally, the information is used to provide a national perspective on where the program is going (prospective view), and to provide a gauge for program accomplishments against program objectives for purposes of identifying continuing challenges and formulating technical assistance and management support provided to P&A systems. Finally, the form's prospective information is compared for interpretation purposes with the corresponding performance data and outcomes that are reported to Congress, as required by the Government Performance and Results Act Modernization Act of 2010 (GPRAMA).

AIDD plans to make the data from these reports available to the general public on the ACL internet site (<https://acl.gov>).

3. Use of Improved Information Technology and Burden Reduction

The report will be submitted electronically. A major consequence of the electronic submission of the PPR is enhanced ability to review the PPRs and to manage the data in them.

4. Efforts to Identify Duplication and Use of Similar Information

A careful review of the PPR was conducted to avoid any duplication in the reports submitted by the P&As. No duplication was found. The PPR is retrospective, showing how the P&As actually performed in comparison to the prior year plan.

5. Impact on Small Businesses or Other Small Entities

The information collected does not involve, nor result in assignment of burden to any small business or other small entity. It is collected from 57 State systems designated by the governor of each State.

6. Consequences of Collecting the Information Less Frequently

The collection of data less frequently than that prescribed by the requirements of the Act and by the regulations (annually), would violate the statute and regulation. Less frequent collection would also prevent the Department from meeting its obligations under GPRAMA. Further, it would deny the Department the opportunity to have a year to year understanding of the P&A planning process in each State for purposes of providing technical assistance. In addition, the annual reports provide ongoing data on the performance of the P&As in terms of the requirements of the Act and performance outcomes.

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

There are no special circumstances governing the collection of data that are inconsistent with the established guidelines pursuant to 5 CFR 1320.5.

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

A notice was published in the Federal Register in Vol. 82, No. 10, pages 4888-4889, on January 17, 2017, announcing that ACL was requesting approval of a new data collection. ACL has not received any comments expressing concern related to the new

PPR reporting forms for the P&A program. However, one minor technical change was made to the PATBI PPR template to clarify an information collection item on the form in Part I, section C(1)– Public Relations and Outreach. ACL added the language “racial and ethnic” before the word “minority” to the section C(1) question, “Describe the agency’s outreach efforts to previously unserved or underserved individuals, including minority communities” to make sure the question is clear.

The PPR will allow federal staff to review the programs performance and achievement and assist where technical assistance is needed. Additionally, information contained in the PPR provides performance measures based on the annual reports. The performance data is reported to Congress under the Government Performance and Results Act Modernization Act (GPRAMA).

Issues regarding the functionality and usability of the proposed data collection for the PPR were discussed with a sample of five grantees, and their input was addressed in the development of the ICR. The format reflects minor changes suggested by this group.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts to respondents are planned.

10. Assurance of Confidentiality Provided to Respondents

There are no data collected that requires confidentiality, and hence no assurance of confidentiality is required. All data is aggregated by the States, and no individual data is provided to the Federal Government.

11. Justification for Sensitive Questions

No data is collected from States that is of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

The following table summarizes the burden hour estimate for this information collection:

No. of States	No. of Responses Per State	Average Burden Hours Per State	Total Hours
57	1	16	912

The estimates of annual burden to the States vary greatly in accordance with the size, program complexity, and technological capacity of the States. Consultations with selected States indicated that the range of times would vary. The current estimate of annual burden is from 1 to 2 eight-hour days with the most common figure of about two eight-hour days. Hence, a mode of 2 days (16 hours) is being used in these calculations.

Consequently, the estimated burden hours are 912 hours (57x16).

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

Number of Respondents	Average Burden Hour per response	Hourly Wage Rate	Total Annual Cost
57	16	\$40	\$36480

This estimated average cost per hour includes a base average salary of \$20.21 plus 100% of salary for fringe benefits and overhead. The computation of the average annual cost per states (\$640.) is the average cost per state (\$40.) multiplied by the average burden hours per states (16). This figure is then multiplied by the 57 States to derive the total annual cost of \$36,480. The hourly rate was derived from the Bureau of Labor Statistics salary category for Community and Social Service occupations (https://www.bls.gov/oes/current/oes_nat.htm).

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

There is no annual cost burden or startup cost to respondents resulting from collection of information for the PPR.

14. Annualized Cost to the Federal Government

This computation is based on an estimated \$90 per hour for the efforts of a Program Specialist Grade 13 step 1; this estimated hourly rate includes a base average salary of \$45 plus 100% for fringe benefits and overhead.

Program specialists will devote an estimated 80 hours per year to organize and review each Program Performance Report and to generate analyses of the information therein for the uses described in section 2.

Total Estimated Federal Costs: \$7,200.

15. Explanation for Program Changes or Adjustments

There are no OMB approved data collection forms for the recipients to provide documentation on the progress, achievement and performance of their program. This effort represents the creation of a new form.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of this information collection are not planned to be published for statistical use.

The PPRs are prepared by the P&A systems and submitted to the Department by January 1 of each year. Program personnel check the PPRs for completeness and consistency, and prepare program reviews and summaries of the information for use in technical assistance formulation, and for program management studies. Program personnel aggregate the data, do national analyses (sum, average, etc.), and other management analyses. The information obtained is used by AoD to develop program priorities and to formulate technical assistance.

Legislation and regulation mandate the information collected within the PPR, and once acquired, it becomes part of the public domain. AIDD plans to make the data from these reports available on the internet to the general public.

A small amount of quantitative data is summed to show national totals for reports. Analysis and reporting of the data includes pie-charts and bar-charts. Textual data is stored in electronic databases for access by word-searches and to search for commonalities among States with regard to performance and researching activities of evolving interest. Reporting on this data will be on an annual basis.

Additionally, information contained in the PPR provides data related to performance measures, which is reported to Congress under the GPRAMA.

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

The OMB expiration date will be displayed on all data collection instruments.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.

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

This information collection does not employ statistical methods.