

**U.S. Department of Education**

**Rehabilitative Services Administration**

Payback Information Management System (PIMS)

Supporting Statement

*Office of Management and Budget  
Clearance Package Supporting Statement  
And Data Collection Instrument*

## **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

### **INTRODUCTION**

Established in 1954, the Rehabilitation Training Program is one of the oldest existing federal training grant assistance programs. The Rehabilitation Training Program's purpose is to:

- a. Increase the supply of qualified personnel available for employment in the public rehabilitation program, which includes the state-federal program of vocational rehabilitation, federally funded independent living centers, and providers of services to state agencies and independent living centers and programs.
- b. Maintain and upgrade basic skills and knowledge of personnel employed in the public rehabilitation program.

Rehabilitation training grants are awarded to ensure that skilled staff is available to provide the broad scope of services required by clients of the state-federal programs of vocational rehabilitation, supported employment, and independent living. Such services are provided by state vocational rehabilitation agencies and public and private nonprofit organizations through service arrangements with state vocational rehabilitation agencies.

The Rehabilitation Services Administration (RSA) is submitting this application to request approval to:

- Collect contact and training information for all scholars from RSA grantees;
- Collect employment information from RSA scholars; and,
- Collect employment verification information from employers for RSA scholars who fulfill their obligation through service.

The proposed data collection serves three purposes. First, these data are necessary to determine if scholars comply with the service obligation requirements. Second, these data are necessary to assess the performance of the RSA Rehabilitation Long-Term Training (RLTT) program on its Government Performance Results Act (GPR) measures. And finally, data are collected for project monitoring and program improvement.

The proposed forms in this package are a revision to the current collection 1820-0617. For the current collection, grantees (Institutions of Higher Education) submit an Annual Payback Report through the online RSA Management Information System (MIS). The revised collection would be expanded to collect data from scholars and employers in addition to grantees through the Payback Management Information System (PIMS) and

includes a) Grantee Scholar Record; b) the Scholar Training and Employment Record; and c) the Employment Verification Record.

## **A. JUSTIFICATION**

### **A1. Circumstances Making the Collection of Information Necessary**

Under Section 302 of the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA), hereafter referred to as “The Act,” the RSA provides Long-Term Training grants to academic institutions to support scholarship assistance to scholars. Scholars who receive scholarships under this program are required to work within the public rehabilitation program, such as with a State vocational rehabilitation agency, or an agency or organization that has a service arrangement with a State vocational rehabilitation agency, in qualified employment fields, which include rehabilitation counseling, administration, supervision, teaching or research in vocational rehabilitation, supported employment, or independent living rehabilitation of individuals with disabilities, especially individuals with significant disabilities. The scholar is required to work two years in such settings for every year of full-time scholarship support. The service obligation for the scholar who matriculated part time, is based on the equivalent total of actual academic years of training received. The program regulations at 34 CFR 386.33-386.36 and 386.40-386.43 detail the payback provisions and the RSA scholars' requirements to comply with them.

Section 302 (b)(2)(C) of the Act requires that data on the employment of scholars are accurate, including tracking of scholars' employment status and location of former scholars supported under the RLTT grants in order to ensure that scholars are meeting the payback requirements.

Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, section 75.591) (20 U.S.C. 1221e-3 and 3474).

In addition to meeting the requirement that all scholars be tracked, the data collected will provide performance data relevant to the rehabilitation fields and degrees pursued by RSA scholars, as well as the funds owed and the rehabilitation work completed by them. These data are used to assess program effectiveness and efficiency, and to meet the reporting requirements of the Government Performance and Results Act (GPRA).

RSA is requesting a revision of the currently approved collection for grantees (Institutions of Higher Education) to submit an Annual Payback Report through the online RSA Management Information System (MIS). To collect the needed data, RSA created the revised Payback Information Management System (PIMS). Through the PIMS grantees, scholars and employers report data electronically.

### **A2. Purposes and Uses of the Data**

To fulfill the requirements set forth in Section 302 of the Act, grantees, scholars, and employers will submit data to track scholars' service obligations. Grantees are required to track the education status of all scholars who receive financial support. This information includes: information about cumulative support granted to RSA scholars, graduation dates or other information about scholars completing or exiting programs, scholar-debt in years, program completion data for each scholar, and current contact information. Scholars submit data about their employment and employers and grantees verify whether the scholar was employed and if the position was considered eligible for service obligation fulfillment.

RSA will use (and currently uses) the information to assess grantees' compliance with the requirements of the RLTT program and to report to Congress on progress on meeting the purpose of training programs, including the RLTT program, which is to ensure that skilled personnel are available to provide rehabilitation services to individuals with disabilities through vocational, medical, social, and psychological rehabilitation programs.

The Payback Information Management System will be used to collect the information necessary to analyze the program's impact, including characteristics of RSA scholars in the training programs, the number of RSA scholars entering the rehabilitation workforce, the rehabilitation fields being entered, the types of employment (e.g. State agency, nonprofit service provider or practice group), and verification by the employer that the employment information is accurate. This information enables RSA to address the Congressional mandate to secure data based upon program compliance requirements and the annual evaluation of performance indicators. The revised system will provide RSA with more reliable data and give RSA information regarding the program's performance and effectiveness on an ongoing basis.

### **A3. Use of Technology to Reduce Burden**

RSA will collect all data in a web-based data collection system which is maintained on a secured server. Grantees and scholars will log into PIMS using their email address and a password to enter data. Employers are provided secure links to review and verify employment. An online system has been used in the past by grantees (RSA's Management Information System) and has not posed a hardship, so RSA does not anticipate that the extended use of a web-based system for scholars and employers will be a problem. The system is designed to minimize burden on respondents by programmatically skipping inapplicable items and storing and displaying data previously entered. For many items, users simply review data previously entered and verify its continued accuracy.

### **A4. Efforts to Identify Duplication**

There is no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere.

#### **A5. Methods to Minimize Burden on Small Entities**

The information requested rarely involves the collection of information from small businesses. There may be some employers classified as small businesses; however, the Employment Verification Record was designed to solicit only the information necessary to respond to program and GPRA requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet Federal requirements for budget and program activity data. In addition, this system utilizes a secure online tracking system which allows employers to easily review information already entered by the scholar and then submit verification or provide revisions.

#### **A6. Consequences of Not Collecting Data**

The information in this collection cannot be submitted less than annually because the Act and its corresponding regulations, require that data on payback be reported to RSA annually. PIMS will allow grantees, scholars and employers to report required information in a concise, consistent manner and it is an essential tool in the monitoring of scholars' service obligation requirements. To require less frequent data collection would result in the inability of the Secretary to assure that grantees and scholars are complying with the statutory requirements.

In addition, RSA relies on this information annually for other functions, such as monitoring, provision of technical assistance, budget development, and mandated reports to Congress on performance standards related to program purpose.

#### **A7. Special Circumstances**

The only special circumstance that applies is the circumstance for retaining records for more than three years. RSA training grantees are required by statute to track, maintain and report information on current RSA scholars until all scholars have completed their work obligations. It is the grantees' responsibility to maintain complete and accurate records on all scholars who receive financial assistance through RSA grants and to submit all required information to RSA on an annual basis. With an obligation of two years of work per year of scholarship assistance received, the majority of scholars must be tracked for four years or more. Failure to report information on both current and exited scholars may adversely impact a grantee's ability to receive future Federal grants.

#### **A8. Federal Register Comments and Persons Consulted Outside the Agency**

This Information Collection was placed in the Federal Register for a 60-and 30-day public comment period; RSA did not receive any public comments during the 60-day comment period. RSA will address if any public comments received during the 30-day FRN comment period while pending final OMB approval.

RSA conducted two focus groups with eight grantees to both obtain feedback on the PIMS and the survey instruments. RSA made some revisions to the instruments in response to the grantees' input.

#### **A9. Payments or Gifts**

There are no payments or gifts to respondents in support of the data collection.

#### **A10. Assurances of Confidentiality**

All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the "Buckley Amendment," Family Educational and Privacy Act of 1974, 20 USC 1232 g; and, as appropriate, the Federal common rule or ED's final regulations on the protection of human research participants. This is to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects as contained in ED regulations. In accordance with the Privacy Act of 1974, a system of records (SORN) and Privacy Impact Assessment (PIA) will be published while the data collection is under PRA clearance by OMB; Privacy data will not be collected prior to SORN publication.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of individually identifiable information. In addition, the data collection system that PIMS will be part of, the Personnel Development Program Data Collection System (PDPDCS), was reviewed by ED's Office of the Chief Information Officer (OCIO) for compliance with the Federal Information Security Management Act (FISMA), OMB Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. The system was granted an Authority to Operate (ATO) on November 10, 2016.

#### **A11. Justification of Sensitive Questions**

Questions regarding Social Security Number (SSN), employment status, and service obligation status may be considered sensitive. However, SSN, employment and service obligation status questions are necessary to directly respond to GPRA measures and program requirements for service obligation. In addition, the Accounts Receivables and Bank Management Group and the U.S. Department of Treasury require SSNs when scholars are referred because they did not repay their service obligation through eligible employment and must, therefore, repay part or all of the funding they have received.

## A12. Estimates of Hour Burden

Three different sources—the grantees, scholars, and employers—will be asked to report or verify information about the scholar. The time taken by a scholar to complete the Scholar Training and Employment Record will vary based on the individual's employment. The approximate time required for grantees to complete the Scholar Record and for employers to complete the Employment Verification Record will not vary widely. For all respondents, much of the information in these forms are pre-populated and require only verification.

Table A-1 presents the **maximum** annual burden estimates of 4,857 hours for grantees, scholars, and employers. The program office estimates that 350 active grantees, 3,600 scholars, and 3,600 employers will respond to this collection annually. Given that scholars and employers are only able to submit and verify employment information once a scholar has exited the training program, not all scholars/employers will respond in any given year; so, for the purposes of estimating burden, we assume that roughly 3,600 scholars will be employed. The actual number of grantees, scholars and employers may vary due to the availability of Federal appropriations, number of grant awards made, and the number of scholars recruited by each project. This is our best estimate taking these variables into consideration.

For burden estimates, we assume that grantee administrators and employers have an hourly rate of \$50. We assume an average hourly rate of \$18.62 for scholars. Given these rates and the hour estimates below, the maximum estimated annual burden is \$167,208.51 across all grantees, scholars, and employers. Below we describe how these estimates were derived for each instrument.

### *Grantees: Scholar Record*

We estimate that 350 grantees will respond to this data collection instrument annually. The burden for grantees of completing the Scholar Record is estimated at 3.5 hours per grantee per year. This estimate includes an average of 15 minutes per scholar the grantee will spend entering and updating information each year. On average, each grantee has 14 active scholars at a time. In many cases, the grantee will be reviewing and updating information already entered.

### *Grantees: Payback Agreement*

Project Directors must ensure that any scholar receiving scholarship assistance from the grant signs and dates a "payback" agreement **prior to the initial disbursement of any scholarship funds** on his/her behalf, including the payment or crediting of tuition. In addition, prior to granting each year of a scholarship, the grantee must ensure that each scholar signs a written agreement in which the scholar agrees to the terms and conditions set forth in the regulations (34 CFR 386.40). **The Project Director must fully disclose**

**to the RSA scholar the terms and conditions of the payback requirement in the application for an RSA scholarship.** The written agreement must contain the terms and conditions required by the regulations (34 CFR 386.40).

Project Directors usually present information about their programs and explain the payback agreement during their program orientation, which typically takes place in a group rather than individual session. Group sessions are estimated to take 30 minutes to ensure scholars are well informed about the terms of the agreement and their responsibility.

Our estimate is based on the assumption that grantees meet with scholars in groups of 10 to explain the agreement, answer questions, and complete and sign the agreement with the scholars. Because the agreement is completed prior to the start of training, grantees primarily conduct this activity in the first and second years of their grant. We estimate that the current number of grantees that total 106 will need to conduct this activity a minimum of annually, but will more likely conduct this activity twice per year, with an average of 19 scholars per grant. We are basing the calculation on twice per year.

#### *Grantees: Exit Certification*

The Exit Certification is a one-time form that is completed and signed by a scholar when he/she completes the grant training program or exits prior to completion. Grant Project Directors review the Exit Certification one-on-one with scholars and we estimate the process to take approximately 15 minutes to complete.

Of the current 106 grantees, we estimate that each Project Director will need to conduct this activity annually with an average of 19 scholars per grant.

#### *Scholars: Scholar Training and Employment Record*

Per program regulations, scholars may begin fulfilling their service obligation through eligible employment after they have completed or exited the program. The number of scholars entering data in any given project year will vary, but may be as many as 3,600 scholars. For FY 2016 reporting there were 3,600 scholars who had yet to complete their service payback. We anticipate that scholar burden will average 15 minutes per year.

#### *Scholars: Payback Agreement*

As noted above under the Grantee: Payback Agreement, the Payback Agreement is completed and signed prior to the scholar beginning the program and prior to receiving additional scholarship funds so the scholar can glean his/her total indebtedness. Each scholar may participate in an information session with his/her Project Director or be counseled one-on-one to discuss, complete and sign the agreement prior to the disbursement of the scholarship. We estimate that these sessions will last roughly 30 minutes and that roughly 19 scholars in 106 grants will conduct this activity as previously prescribed or contingent upon the availability of funds.

*Scholars: Exit Certification*

As noted above under the Grantee: Exit Certification, the Exit Certification is completed only once per scholar per grant. Each scholar will meet with his/her Project Director at the time he/she completes the program or leaves prior to completion. We estimate that it will take 15 minutes for each scholar to review, discuss, complete, and sign the Exit Certifications. To calculate the annual number of scholars who would need to complete the Exit Certifications, we estimate that roughly 19 scholars in 106 grants will conduct this activity upon exiting from their program of study each year.

*Employers: Employment Verification Record*

For employers, the scholar initiates employment verification annually; however, some scholars: a) exercise their allowable two-year grace period; b) are not employed in eligible employment; or c) enter deferment due to an approved reason or receive a waiver. Therefore, the number of employers asked to provide verification may be lower than the number of scholars that completed or exited the training grants. We anticipate the employers' burden to be 10 minutes per scholar per year.

Table A-1. Maximum Annual Burden Estimates, by Data Source

<b>Data Source (Frequency)</b>	<b>Estimated Number of Respondents</b>	<b>Estimated Annual Burden per Respondent (in Hours)</b>	<b>Estimated Annual Burden (in Hours)</b>	<b>Estimated Total Annual Cost (in Dollars)</b>
Grantees: Scholar Record (Annual)	350 grantees	3.5	1,225	\$61,250 <sup>1</sup>
Grantees: Payback Agreement (Once per scholar/grant; conducted in groups of ten scholars)	106 grantees (19 scholars enrolled/year)	1	106	\$5,300 <sup>1</sup>
Grantees: Exit Certification (Once per scholar/grant)	106 grantees (19 completers/year)	4.75	503.5	\$25,175 <sup>1</sup>
Scholars: Scholar Training and Employment Record (Annual)	3,600 scholars	0.25	900	\$16,758 <sup>2</sup>
Scholars: Payback Agreement (Once per grant)	2,014 scholars	0.5	1,007	\$18,750.34 <sup>2</sup>
Scholars: Exit	2,014 scholars	0.25	503.5	\$9,375.17 <sup>2</sup>

Certification (Once per grant)				
Employers: Employment Verification Record (Annual)	3,600 employers <sup>3</sup>	0.17	612	\$30,600 <sup>1</sup>
<b>Totals</b>	<b>11,790</b>	<b>10.42</b>	<b>4,857</b>	<b>\$167,208.51</b>

<sup>1</sup> Based on an estimated hourly rate of \$50 for grantee administrators and employers.

<sup>2</sup> Based on an estimated average hourly rate of \$18.62 for scholars.

### A13. Estimate of Cost Burden to Respondents

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in A12, including capital or start-up costs, or operation, maintenance, or purchase of services. It is assumed that all respondents have access to a computer either through the grantee Institution of Higher Education or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondents reliable access to support services. This Help Desk could assist a respondent without reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

### A14. Estimate of Annual Cost to the Federal Government

The total annual cost to the Federal government reflects the combined costs for RSA to contract the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

Type of Cost	Cost
RSA Staff (salaries)	\$18,033
Contractor Data and Reporting Services (Fixed price)	\$218,846
Total	\$236,879

RSA has secured a fixed price contract with AnLar and Westat to create and manage the online data collection system. The fixed cost for this contract is \$218,846 for the base year (July 2017 – June 2018). These costs include the development and maintenance of the system, support for respondents, and preparation of reports. The majority of communications with respondents will be electronic; however, scholars who do not respond to electronic or telephone communications will be sent follow-up letters. The costs for those mailings are included in the contract.

The RSA program office maintains a program specialist whose function is to spend 25 percent of the time managing the contract and 12 tasks. This program position is a GS-12, which, in 2017, ranges from \$62,722 to \$81,541 in annual salary.

**A15. Program Changes or Adjustments**

There is a program change increase of 4,508 annual burden hours and an increase of 11,440 respondents. This request is for a revision to an approved data collection; to collect more accurate and complete data and improve grant monitoring and performance reporting capabilities. As part of this revision we will collect data from grantees, scholars and employers; by also collecting data from scholars and employers, rather than just grantees. (see Table A-3, below).

Table A-3. Program change increase in Burden Hours from the current 1820-0617

<b>Total Burden Hours</b>	<b>OMB Form #</b>
4,857	Revised 1820-0617
350	Current 1820-0617
4,507	<b># Burden Hours Increase</b>

**A16. Plans for Tabulation and Publication of Results**

RSA will utilize this information in preparing its Annual Report to Congress on the activities carried out under the Rehabilitation Act. The data will also be used on an annual basis to report results to ED’s Budget Service for compliance with GPRA and publication in the Congressional Justification for ED’s budget. A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected. The number of scholars and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. The report will also provide data to monitor the fulfillment of scholar service obligation and grantee and scholar compliance with the program regulations. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets. All data will be in an aggregate form to protect PII and no PII information will be published.

**A17. Approval to Not Display the OMB Expiration Date**

This item is not applicable as the OMB expiration date will be displayed for each respondent type the first time they login or enter the system.

**A18. Explanation of Exceptions**

There are no exceptions to the certification statement.

## SECTION B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

### **B.1 Collection of Information Employing Statistical Methods**

This collection does not use statistical methods.