

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Independent Living Services Program Performance Report
OMB Number: 0985-0043

A. Justification

1. Circumstances Making the Collection of Information Necessary

In compliance with 44 U.S.C. § 3507, ACL has submitted the following proposed collection of information to OMB for review and clearance. The Act of 1973 requires three Independent Living program reports: (1) State Plan for Independent Living, (2) Independent Living Services (ILS) Program Performance Report (PPR), and (3) Centers for Independent Living (CIL) PPR. The ILS PPR and CIL PPR were previously combined into one submission. However, for the purposes of this data collection, the ILS PPR and CIL PPR are being submitted separately because they are separate collections of different information from different parties. Separating these PRA processes reduces confusion and increases the Independent Living Administration’s ability to identify issues specific to DSEs and Statewide Independent Living Councils (SILCs). This request is for the ILS PPR, which is submitted annually by the SILC and DSE in every state that receives Subchapter B funds. The ILS PPR serves as the main way for DSEs to fulfill their requirement to “submit . . . reports with respect to . . . records” of “the amount and disposition of . . . financial assistance” from ACL and the costs of projects that financial assistance from ACL pays for. 29 U.S.C. § 704(m)(4); 45 CFR 1329.6(b).

This collection of information is an extension with changes. The changes include current terminology, cite current statutes—including the Workforce Innovation and Opportunity Act, 29 U.S.C. 3101, *et seq.*—and regulations, correct grammatical and punctuation errors, clarify instructions, and use acronyms when and only when they save space without confusing the reader.

2. Purpose and Use of the Information Collection

The ILS PPRs are used by ACL to assess grantees’ compliance with Title VII of the Act, with 45 CFR part 1329 of the Code of Federal Regulations, and with applicable provisions of the HHS Regulations at 45 CFR part 75. On the basis of ACL’s assessments of PPRs, it provides technical assistance, further assesses compliance, grants and denies continuations, and terminates grants. ILS PPRs are necessary forms of compliance assessment. In addition, ILS PPRs alert ACL about what grantees need further assessment. The PPR is also used by ACL to design CIL and SILC training and technical assistance programs authorized by section 721 of the Act. See 29 U.S.C. § 721(b)(1); see 45 CFR 1329.24. The data is also used to meet the requirements of GPRAMA regarding performance measures. 31 U.S.C. § 1115 (2011).

3. Use of Improved Information Technology and Burden Reduction

All ILS PPRs are submitted electronically through ACLReporting because it standardizes answers in a way that is easy to understand, search, remotely access, and store. The questions are phrased in ways that minimize the time and effort that answering requires and in ways that channel answers into categories that conveniently tell ACL what it needs to know. (These forms are all in the same easy-to-understand and easy-to-compare format.)

4. Efforts to Identify Duplication and Use of Similar Information

The data is necessary for the purpose described in Item 2 above and is not available through other data collections.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

The Rehab Act, as amended, requires ACL to annually determine that DSEs have made substantial progress and are, therefore, eligible for continuation awards. Collecting the pertinent information less than annually would not allow ACL to determine funding and grant and deny continuations as statutorily required. See 29 U.S.C. 711(a)(1)(A) (“for each fiscal year . . . , the Administrator shall make an allotment to each state”).

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

None of the listed provisions applies to this information collection.

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

A 60-day notice was published in the Federal Register in vol. 83, No. 2018-22751, pages 53062–53063 on October 19, 2018. We received the following comments.

Comment	Discussion	Action
One commenter asked whether ACL intends for states to use the new ILS PPR for the report that will be due in January 2019.	ACL does not intend for states to use the new ILS PPR for the report that will be due in January 2019.	No change has been made.
One commenter asked whether ACL has an update on the publication of the revised CIL indicators.	ACL is updating the CIL indicators and expects to complete them by the extension’s end.	No change has been made.
One commenter asked whether there are other email lists related to IL services	ACL knows of no other email lists related to IL services policies or programs that	No change has been made.

policies or programs that ACL has that DSEs could benefit from.	DSEs could benefit from being added to; the commenter might benefit from information provided by ILRU, the training and technical-assistance provider.	
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External Consultation

ACL is not seeking external input because this version of the ILS PPR does not contain substantive changes from the previous version. The extension’s purpose is to allow ACL to determine what substantive changes would be appropriate.

9. Explanation of Any Payment or Gift to Respondents

Not Applicable.

10. Assurance of Confidentiality Provided to Respondents

The Department provides no assurances of confidentiality.

11. Justification for Sensitive Questions

Not Applicable.

12. Estimates of Annualized Burden Hours and Costs

ACL estimates the burden of this collection of information as follows: Fifty-six jurisdictions—specifically, the fifty states, Puerto Rico, the District of Columbia, and the outlying areas—will each complete ILS PPRs annually, and it will take an estimated thirty-five hours per jurisdiction per ILS PPR. Each jurisdiction’s SILC and DSE will collaborate to complete the ILS PPR. The fifty-six jurisdictions combined will take an estimated 1,960 hours per year to complete ILS PPRs. This burden estimate is based on what DSEs and SILCs have told ILA about how long filling out ILS PPRs took in previous reporting years.

Respondent/Data collection activity	Number of respondents	Responses per respondent	Hours per response	Total Annual burden hours
SILCs and DSEs	56	1	35	1,960

The calculation is based on the median salary for social workers, which, according to the Bureau of Labor Statistics, is \$23.07 per hour. Multiplying the total response time—1,960 hours—by this median hourly salary results in \$45,217.20. Multiplying this \$45,217.20 by two—to account for benefits and overhead costs—results in \$90,434.40.

Respondent/Data collection activity	Total Annual Burden Hours	Average Cost Per Hour	Total Cost
ILS PPR	1,960	\$46.14	\$90,434.40

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

No additional capital or other costs are incurred by respondents other than those specified in this question.

14. Annualized Cost to the Federal Government

Each report takes approximately two hours to review and approve, and there are 56 reports, so ACL will spend approximately 112 hours reviewing these reports. ACL staff members who will review these reports will be GS-11s, GS-12s, and GS-13s; all of whom work in Washington, DC. The median salary of a reviewer is estimated as \$44.28 per hour, which is the salary of a GS-12, step 5 in the Washington, DC area. This median hourly salary multiplied by the 112-hour estimate of the total review time is \$4,959.36. Multiplying this \$4,959.36 by two—to account for salaries and benefits—results in an estimated total cost of the review of \$9,918.72.

15. Explanation for Program Changes or Adjustments

This report reflects no change in estimated hour burden per respondent.

16. Plans for Tabulation and Publication and Project Time Schedule

Data will be made available to the public upon request.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The OMB expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.