

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Centers for Independent Living Program Performance Report
OMB Number: 0985-NEW**

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 (CILs) 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 respondents. Separating these PRA processes reduces confusion and increases the Independent Living Administration’s (ILA) ability to identify issues specific to designated state entities (DSEs) and Statewide Independent Living Councils. This request is for the CIL PPR, which is submitted annually by every CIL that receives Rehabilitation Act Title VII, Subchapter C funding. The CIL PPR serves as the main way for CILs to fulfill the requirement to “[submit] an approvable annual performance report demonstrating that the Center meets the indicators of minimum compliance.” 29 U.S.C. § 725(c)(8) (2015); 45 CFR 1329.21(a)(2).

This collection of information is new. This new collection uses 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 CIL 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. CIL PPRs are necessary forms of compliance assessment because PPRs alert ACL about grantees that 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) (2015); 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

The reports 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. CIL PPRs, because they are all in the same easy-to-understand and easy-to-compare format, conspicuously display trends and patterns that inform ACL’s training and technical assistance programs. See 29 U.S.C. § 721(b)(1) (2015); see 45 CFR 1329.24.

4. Efforts to Identify Duplication and Use of Similar Information

The data that is necessary for the purpose described in Item 2, above, is not available through other data collection.

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 grant or deny continuations of Subchapter C funding to CILs, so collecting the pertinent information less than annually would not allow ACL to appropriately grant or deny continuations.

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. 2018-22754, pages 53064–53065 on October 19, 2018. We received a comment that applied to this notice, as indicated below.

Comment	Discussion	Action
One commenter asked whether ACL has an update on the publication of the revised CIL indicators.	ACL has no update on the publication of the revised CIL indicators.	No change has been made.

External Consultation

ACL is not seeking external input because this version of the CIL PPR does not contain substantive changes from the previous version. The new collection’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 assurance of confidentiality. Instead, we indicate that privacy efforts will be conducted to the “full extent permitted by law.”

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: Three-hundred fifty-three CILs will each complete CIL PPRs annually, and it will take an estimated thirty-five hours per CIL per PPR. The 353 CILs will take an estimated 12,355 hours to complete CIL PPRs. This burden estimate is based on what CILs have told ILA about how long filling out CIL PPRs took in previous reporting years.

Respondent/Data collection activity	Number of respondents	Responses per respondent	Hours per response	Total Annual burden hours
CILs	353	1	35	12,355

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—12,355 hours—by this median hourly salary results in \$285,029.90. Multiplying this total amount of salary costs by two—to account for benefits and overhead—results in \$570,059.80.

Respondent/Data collection activity	Total Annual Burden Hours	Average Cost Per Hour	Total Cost
CILs	12,355	\$46.14	\$570,059.80

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 353 reports, so ACL will spend approximately 706 hours reviewing these reports. ACL staff members who will review these reports will be GS-11s, GS-12, 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 706-hour

estimate of the total review time is \$31,261.68. Multiplying this \$31,261.68 by two—to account for salaries and benefits—results in an estimated total cost of the review of \$62,523.36.

15. Explanation for Program Changes or Adjustments

Not applicable.

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

Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement.