

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The Higher Education Opportunity Act (HEOA) of 2008 (20 USC 1140p-1140r) called for creation of a national technical assistance center to provide information to students, families, and professionals to improve access to higher education for students with disabilities. Congress provided funding for the National Center in fiscal year 2015.

In accordance with section 777(a)(4)(c) of the HEOA, the National Center shall be responsible for building, maintaining, and updating a database of disability support services information with respect to institutions of higher education, or for expanding and updating an existing database of disabilities support services information with respect to institutions of higher education. Such database shall be available to the general public through a website built to high technical standards of accessibility practicable for the broad spectrum of individuals with disabilities. (See <https://www.gpo.gov/fdsys/pkg/PLAW-110publ315/html/PLAW-110publ315.htm>.)

There is no existing database of disabilities support services information with respect to institutions of higher education. The type of collection is new. This is not associated with rulemaking.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Department of Education, Office of Postsecondary Education (OPE) awarded one National Center for Information and Technical Support for Postsecondary Students with Disabilities grant award to build a database of disability support services information at institutions of higher

¹ Please limit pasted text to no longer than 3 paragraphs.

education. This Center is named the National Center for College Students with Disabilities (NCCSD); it is located at the Association on Higher Education and Disability (AHEAD).

The National Center will establish a uniform dataset across all degree granting institutions of higher education (IHE) in the United States. The dataset will include:

- 1) Campus contact information for disability services;
- 2) Support services available, including academic and nonacademic supports such as classroom accommodations, accessible instructional materials, and financial aid;
- 3) Accommodations policies;
- 4) Campus accessibility;
- 5) Campus advisory structures, training, and educational programming to enhance awareness of disability across campus.

Data collection will take place online through a secure data management system.

The resulting data will be available online to the general public including students with disabilities, their families, and professionals, as well as other interested parties such as researchers and policy makers. The collection will also support the National Center in reporting on services and enrollment of students with disabilities.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

All data will be collected in a secure online database that will be created using software purchased from Intuit Quickbase (quickbase.intuit.com). All data entry, tracking, and retrieval will be electronic. A web-based data collection system was determined to be the best approach for several reasons:

1. This system allows IHEs to fill in data from any computer with Internet access.
2. Given the longitudinal nature of the project, a web-based information system reduces burden by allowing IHEs to review the previous year's information and make updates as needed, rather than entering a full set of annual data without reference to previous entries.
3. This system provides a secure mechanism for transmittal of data.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is currently no centralized source of information about disability support services at institutions of higher education. While College Navigator does provide links to disability service offices, available data sources (e.g., the Integrated Postsecondary Education Data System and College Navigator) do not gather information about campus disability services or accessibility for students with disabilities. This data collection is based upon statutory authority to build,

maintain, and update the database. Because it will be provided to the general public, it requires high technical standards for accessibility.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

Collection of information does not involve small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This collection will provide students with disabilities with information that will inform their decisions about college enrollment and persistence without full knowledge of the campus resources and accessibility they are entitled to under the Americans with Disabilities Act. Information will continue to be piecemeal, inconsistent across college campuses, and difficult to locate.

Under federal statute a major duty of the National Center is to address this gap in information collection and dissemination to benefit students with disabilities and their families as well as the IHEs and professionals serving and advising students with disabilities.

Maintaining information collection on an annual basis maintains the currency of public information while assuring minimal burden on IHEs. The information collection will also support the National Center in reporting on disability services and campus accessibility.

7. Explain any special circumstances that would cause an information collection 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;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **in connection with a statistical survey, that is not designed to produce valid and reliable results than 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 confidentiality that 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 that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances involved with this data collection.

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

An extensive review of national databases including datasets available through the National Center for Educational Statistics (NCES) was completed. The information collection tool including data elements and format was designed with input from experts with experience in national online database development. A variety of disability services professionals who reflect those who will be completing the data collection form provided feedback. Consultation with representatives from the disability services professionals completing the information collection will be conducted at least once every three years.

The 60 and 30-day notices will be published in the Federal Register.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

No payments or gifts are being provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

All information collected will be institutional data. There will be no personally identifiable information. There is no pledge for confidentiality of data required for this information collection.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are included in the data collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons**

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

There is a total of 4,583 IHEs (NCES, 2018) who are expected to enter data into the system annually. The time required for completion is estimated to be 3 hours. On most campuses this will consist of 2 hours of information collection and data entry by a campus disability services professional and 1 hour of information collection and overall review by a campus supervisor/director/dean. The total data entry time across respondents is 13,749 hours.

Cost estimate for data entry per campus includes 2 hours for a campus disability services professional (based on AHEAD 2016 Professional Benchmark Survey, average salary of \$47,000/year or \$23/hour) and 1 hour for a campus supervisor (based on AHEAD 2016 Professional Benchmark Survey, average salary of \$69,000/year or \$33/hour) resulting in an annual cost of \$79 per campus.

The annual cost for data collection across all respondents is \$362,057 (\$79 x 4,583 campuses).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

Total Annualized Capital/Startup Cost : _____
Total Annual Costs (O&M) : _____

Total Annualized Costs Requested : _____

There will be no capital or start-up expenses required for data collection. Each of the 4,583 campuses will be able to use existing computers to enter the requested information so there will be no additional burden beyond the personnel time described above.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated cost to the federal government for this data collection over the next year is \$150,154, distributed as outlined in Table 1.

Table 1: Specific tabulation of costs Year 1

<i>Annual costs</i>	
.33 FTE Senior Research Associate	\$44,517
.25 FTE Director of the National Center	\$39,050
.10 FTE Director of Education and Outreach	\$11,587
Contractual Services	\$55,000
<i>Total annual cost</i>	<i>\$150,154</i>

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of

an agency’s control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

There are no program changes or adjustments. This is a new information collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Table 2 indicates the time schedule of project activities for the remaining project period. However, since we do not yet have OMB approval this schedule will need to be altered.

Table 2: Project Activities Schedule

Activity	2018				2019			
	Q1	2	3	4	1	2	3	4
Collection public comment				X	X			
OMB review				X	X			
Data collection					X	X	X	X
Closeout of year's data collection & data cleaning/follow-up								X
Descriptive analyses								X
Launch online database						X	X	X
Write & disseminate Annual Report								X
Final report								X

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.

We are not seeking approval to not display the expiration date for OMB approval.

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

There are no exceptions requested.

Because this is a survey, please see Supporting Statement Part B also attached.