

SUPPORTING STATEMENT

FOR THE PAPERWORK REDUCTION ACT SUBMISSION:

APPLICATIONS FOR NEW GRANTS UNDER THE REHABILITATION SERVICES ADMINISTRATION

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 Rehabilitation Services Administration (RSA) administers and supports a comprehensive array of discretionary grant programs and projects that serve and assist individuals with disabilities. It awards grants based on a competitive process. RSA reviews applications based on the applicant's ability to successfully meet the legislative and regulatory requirements for each program. This review process gives RSA the discretion necessary to determine which applications best address the program requirements and are most worthy of funding.

This grant application package is an extension of a currently approved collection and is necessary in order to standardize applications for the many programs in RSA with the least amount of burden to the applicants. Without the information contained in this application package, the Department would not be able to effectively comply with the legislative mandate and conduct expert peer reviews to make grant funding decisions. Applicants, including individuals and small businesses, may elect to apply for grants.

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.

RSA is unable to use the Department of Education's approved generic application package because of the program-specific selection criteria required under 84.129, Rehabilitation Long-Term Training program, published in 34 CFR Parts 385 and 386; 84.235, Special Demonstrations program published in 34 CFR Parts 373 and 376; 84.250, American Indian Vocational Rehabilitation program, published in 34 CFR Part

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

371; and 84.263, Rehabilitation Training – Experimental And Innovative Training, published in 34 CFR Part 387. The information requested in this collection will be used by the Department of Education program staff to determine the relative quality of grant applications to make grant funding decisions.

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.

RSA requires grant applicants (i.e., institutions of higher education, State agencies, Indian tribes, not for profit organizations, for profit organizations, and individuals) to submit their applications through the Federal government’s central grants system, grants.gov. The use of this electronic submission process allows applicants to prepare, save, and continue to work on the application before submitting. All components of the application are uploaded into grants.gov. This process greatly reduces the burden and cost on applicants to print and mail hard copies of grant applications.

RSA conducts its peer review competitions using distance technology and uses the Field Reader module of G5 to expedite the application review process.

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.

RSA is unable to use the Department of Education’s approved generic application package because of the program-specific selection criteria required under 84.129, Rehabilitation Training-Long Term Training, program published in CFR Parts 385 and 386; 84.235, Special Demonstrations Program, published in CFR Parts 373 and 376; 84.250, American Indian Vocational Rehabilitation program, published in CFR Part 371; and 84.263, Rehabilitation Training – Experimental And Innovative Training, published in CFR Part 387.

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.

The collection of information does not impose undue burden on small businesses or other small entities interested in applying for discretionary funding under these programs.

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 information is not collected from entities on a regular basis. It is collected only as a part of a grant competition. Applicants, including individuals and small businesses, may elect to apply for grants. The information required by the government is minimal. RSA discourages elaborate or lengthy applications. Applicants provide the grant application information voluntarily as a condition of competing for the grant. If RSA cannot collect this information from applicants, it cannot comply with its legislative mandate and conduct expert peer reviews to make grant funding decisions.

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 that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

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.

In prior years, RSA staff have had in-person, email, and telephone conversations with applicants about the discretionary grant application process. The estimates of the number of burden hours associated with this collection and described in response to Q12 are based on this communication.

This is a discretionary grant application that requires the publication of a 30-day Federal Register Notice. The Department published a 30-day Federal Register notice to solicit public comment on April 4, 2019. We received a total of twelve comments. Of those received, eleven comments were in support of this current IC and none of them included a request for changes. The one remaining comment was not related to the topic. Therefore, based on the comments received we do not require any changes to the current versions of the documents.

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

There are no payments or gifts 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

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

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.

This is not applicable to this information collection because it does not collect personally identifiable information (PII).

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.

There are no questions of a sensitive nature.

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 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**

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)

information collection activities should not be included here. Instead, this cost should be included in Item 14.

Estimates of Hour Burden for this Information Collection:

Number of Respondents	230
Hours Needed to Complete...	40 ³
Total Burden Hours	9,200

The information required by the government is minimal. The burden associated with the current information collection request only includes as respondents the programs anticipated to be completed during fiscal year 2019, which includes CFDA 84.129 Rehabilitation Training – Long-Term Training, CFDA 84.235 Special Demonstrations Program, CFDA 84.250 American Indian Vocational Rehabilitation Program, and CFDA 84.263 Rehabilitation Training – Experimental and Innovative Training.

We estimate that the seven CFDA's competing this year, 84.129B,H,P, and Q, 84.235E, 84.250M, and 84.263C will receive approximately 230 respondents with an estimated 40 hours needed to complete for a total annual burden for this collection of 9,200 hours.

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.**

³ Based on discussions with current applicants and grantees 40 burden hours is an average number of hours.

- **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 :

Estimates of Annual Cost Burden to Respondents for this Information Collection:

Preparation of Application (\$28.00 per hour X 40 burden hours) ...	\$1,120
Postage and Printing (\$50.00 per application X 0 applications ⁴)	\$ 0
Total Cost Burden (per respondent)	\$1,120

The estimate of annual cost burden to respondents for this collection is based on the above table calculated at \$28 per hour X 40 burden hours and results in a cost of \$1,120 per respondent.

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.

RSA anticipates that there will be seven competitions requiring two individuals at the supervisory level, seven competition managers, and two additional staff devoted to handling the administrative and logistical functions of the review. RSA discontinued use of an outside contractor to handle the logistical and administrative functions of the peer review process. As a result, the staff time for peer review is estimated at 16 hours for the two individuals at the supervisory level, 240 hours for the seven individuals serving as the competition managers, and 80 hours for the two individuals providing administrative and logistical support with the average grade level being a GS-13 with an hourly rate of pay at \$46.46. This includes: (1) Review and screening of applications; (2) Review of resumes of potential reviewers; (3) Contact with potential reviewers to determine availability; (4) Secure potential reviewers and ensure proper reimbursement to the reviewers; (5) Review and preparation of peer reviewer material; (6) Conducting the grant competition; (7) Review and approval of technical review forms; (8) Pre-funding and competition slate preparation; and (9) Supervisory review and approval of all components of the process as well as final funding recommendations. The annual cost to the Federal government estimated for two staff at 16 hours, seven staff at 240 hours of

⁴ RSA is requiring that all submissions be received electronic format unless a waiver is granted.

their time, and the remaining two staff at 80 hours of their time with an hourly rate of \$46.46 is \$15,610.56.

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).

This information collection includes an adjustment increase of 7,600 burden hours from 1,600 to 9,200 hours. The burden hour increase is a result of a larger applicant pool for RSA's planned grant competitions. The previous collection with a total of 1,600 hours included four smaller program competitions. The proposed collection with a total of 9,200 hours includes two larger programs, 84.129 (4 competitions) and 84.250, as well as two smaller program competitions, 84.235 and 84.263, anticipated to compete in FY 2019.

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.

The application packages are available electronically via grants.gov or the Department of Education's website, ed.gov.

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 approval will be displayed.

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

There are no exceptions to the certification statement.