

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 section. Please limit pasted text to no longer than 3 pages. 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.**

Section 752(h)(2) of the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act (Rehabilitation Act), and the implementing regulations in 34 C.F.R. § 367.31(c) require each grantee under the Independent Living Services for Older Individuals Who Are Blind (IL-OIB) program to submit an annual report to the Commissioner of the Rehabilitation Services Administration (RSA) on essential demographic, service, and outcome information.

The revisions to the currently approved form and instructions include the removal of duplicative and confusing data elements as well as those not specifically required by statute or used for statutorily required activities. RSA is proposing numerous edits in an effort to streamline this data collection and to clarify instructions for grantees.

- 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 information RSA collects is used to evaluate the effectiveness of the IL-OIB program, including calculating the Government Performance and Results Act (GPRA) measures. The information also provides RSA with a uniform and efficient method of monitoring the program for compliance with statutory and regulatory requirements. Information gathered by this data collection is also used in RSA's annual report to Congress and in Congressional budget justifications.

- 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.**

This collection uses the online reporting system through the RSA Management Information System (MIS), enabling all States to submit their information electronically. This system provides respondents a mechanism for submitting required information more quickly and easily.

MIS also auto-calculates numbers and identifies errors before reports can be submitted, which reduces both State and Federal Government burden by allowing States to correct errors quickly and easily before the reports are submitted to the Federal Government for review.

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.

This is the only data collection instrument used for this purpose. There is no duplication of the data collected here with any other information collection.

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.

This collection does not impact 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.

An annual collection is required under Section 752(h)(2) of the Rehabilitation Act and is necessary for the RSA Commissioner to respond to the legislative requirement for an annual report to the President and to Congress as mandated by Section 13 of the Rehabilitation Act. These data must also be collected annually for RSA to determine whether grantees are making substantial progress toward achieving their goals and objectives.

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 would require this information to be collected in a manner as described in the eight bullets in this question.

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.

During initial development, the National Council of State Agencies for the Blind and nearly 90 percent of the IL-OIB project directors reviewed the collection instrument and instructions. RSA considered all comments and suggestions and adopted several recommendations. In the spring of each year, RSA meets with the IL-OIB directors, and one of the topics always addressed is a review of any questions or concerns about this information collection.

The proposed changes in this form and instructions were made in response to questions about the need for greater clarity and streamlining. The 60-day notice of this proposed information collection was published on May 14, 2019, with a due date for comments of July 15. The Department received comments from 17 stakeholders. In response to these comments, we made a few additional clarifying changes in the instructions for some of the items when commenters expressed confusion about our intent. In addition, some program staff wanted to continue to collect information as they did in the past. We acknowledged that the grantees are free to continue to collect information that we are not requiring if they wished to do so, but for our purposes, we would only collect information on the OMB-approved form.

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

No payment or gift has been 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. 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). 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.**

The information collection does not contain specific or personal information.

- 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.**

The information collection does not contain any 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 information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The 56 respondents need an estimated five hours each to complete the report, for a total annual burden of 280 hours.

	Annual Burden
Number of respondents	56
Frequency of response	Annually
Total annual responses	56
Hours per response	5*
Total burden hours	280
State hourly rate of salary	\$36
Total cost	\$10,080

*The hour burden associated with this information collection is estimated at five hours per State or Territory. The estimated hour burden per State or Territory is not expected to vary significantly. Estimated burden hours are founded on judgments from previous State written request submittals for similar RSA grants.

- 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: \$0.00

Total Annual Costs (O&M): \$0.00

Total Annualized Costs Requested: \$0.00

No additional operational expenses are required.

- 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.**

a.	Review of each written request	-- 2.0 hours
b.	Number of written requests to review	-- 56
c.	Total time to review written requests	-- 112 hours
d.	Federal hourly rate of salary	-- \$71
e.	Total cost	-- \$7,952

The average review and approval of an ED RSA-7-OB form takes two hours. The RSA staff person who reviews the completed forms is paid at an average rate of \$71 per hour. The cost of the review and approval process is 2 hours x \$71/hour x 56 reports = \$7,952, annual Federal cost.

- 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 has been revised at the Department's discretion. The data collection has been streamlined to collect only what is necessary to meet statutory requirements and to eliminate duplication and unclear items and instructions. As a result, there is an adjustment in reporting time from six to five hours per respondent and the total burden estimate has been reduced by 56 hours.

- 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 information collected will not be published for statistical use.

- 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.**

This document is not seeking OMB approval to not display the expiration date.

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

This document meets each of the criteria outlined in the "Certification for Paperwork Reduction Act Submissions."