

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 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.**

To maximize the use of funds appropriated for formula grant programs, the Rehabilitation Act of 1973, as amended (Act), authorizes the Commissioner to reallocate to other grant recipients that portion of a recipient's annual grant that cannot be used. The Rehabilitation Services Administration (RSA) reallocates funds for the State Vocational Rehabilitation Services (VR), State Supported Employment Services (Supported Employment), Independent Living Services for Older Individuals Who Are Blind (OIB), Client Assistance Program (CAP), and Protection and Advocacy of Individual Rights (PAIR) programs. The authority for RSA to reallocate formula grant funds is found at Sections 110(b)(2) (VR), 603(b) (Supported Employment), 752(i)(4) (OIB), 112(e) (CAP), and 509(e) (PAIR) of the Act.

- 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 will be used by the RSA State Monitoring and Program Improvement Division (SMPID) to reallocate formula grant funds for the awards mentioned above. For each grant award, the grantee will need to enter the amount of funds to be relinquished and/or any additional funds the grantee would like to request.

- 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.**

The collection of information will be completed using the RSA Management Information System (RSA-MIS). RSA grantees currently enter required State Plan and Federal Financial Report data (e.g., SF-425) into the RSA-MIS. Each grantee has a secure ID and password which is required to logon to the RSA-MIS. This information collection uses the same login credentials to ensure uniformity with currently approved data collections.

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

Submission of reallocation information through the RSA-MIS enables the grantees to revise the amount of funds being requested or relinquished up to the due date of the submission. It also reduces the need for RSA SMPID staff to enter data into a separate spreadsheet for tracking and calculating the revised grant award amounts; thereby, reducing the chance of data entry errors.

- 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.**

Requiring the reallocation data to be entered through the RSA-MIS effectively uses existing RSA-MIS data (e.g., grantee name, address, grant award number, etc.) to reduce the amount of additional information grantees must provide.

- 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.**

Because all grantees currently submit OMB approved required information collection data using the RSA-MIS, there should be no additional impact.

- 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.**

Not reallocating the formula awards on an annual basis would result in a significant loss of program funds for grantees. If not reallocated, funds which grantees are unable to match or expend would be unavailable to meet the employment needs of individuals with disabilities and would potentially revert to the U.S. Treasury. Through the reallocation process, funds relinquished from one grantee are made available to other grantees to assist in meeting program goals.

- 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;**

This information is collected on an annual basis.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

The RSA-MIS form is available at least 30 calendar days prior to the required annual submission date.

- **requiring respondents to submit more than an original and two copies of any document;**

Copies are not required due to electronic submission.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Data is maintained in the RSA-MIS and the Department's grants management system (G5); therefore, grantees are not required to maintain the records in excess of the Federal requirements.

- **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;**

The information collected is not connected to a statistical survey.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

The information collected does not require statistical analysis or classification.

- **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**

The information collected is not protected by confidentiality and is available through FOIA.

- **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.**

The information collected does not include any proprietary trade secrets or other confidential information.

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.

The 60-day Information Collection Request (ICR) for the RSA-692 was published in the *Federal Register* on February 25, 2020 (85 FR 10665). RSA received no comments related to the RSA-692 form. This is the request for the 30-day Federal Register notice inviting public comment.

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.

N/A

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.

N/A

- 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 was provided to any 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.**

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)

No assurances of confidentiality are being made to respondents.

- 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.**

The original data related to the hour burden of the collection was obtained from six respondents who are active grantees and VR Finance Directors. The respondents estimated it would take less than 2 minutes per award to enter the data online. The primary information necessary for the grantee to determine whether to relinquish and/or request funds is tracked using quarterly SF-425 submissions. Therefore, the grantees do not need to complete additional analyses or calculations prior to completing the RSA-692.

- **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)**

N/A

- **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 maximum number of potential submissions of RSA-692 data is 323. This represents the total number of RSA grants awarded that are subject to reallocation. The number of grantees participating in reallocation varies annually; therefore, the methodology used to calculate cost is based on all grantees potentially submitting for reallocation.

It is estimated that 646 total minutes (323 grants multiplied by 2 minutes per submission) or 10.8 hours will be required annually for data submission. Using \$50.00 per hour for staff time, as is used in calculating the current RSA-2 burden, the cost per minute is .83 (\$50 divided by 60). Therefore, the total annual cost for submission of reallocation data is \$536.18 (646 multiplied by .83) or \$1.66 per grant (.83 multiplied by 2 minutes).

Exhibit 1: Estimated Burden and Respondent Costs

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
RSA-692	N/A	N/A	323	323	.033	10.8	\$50.00	\$536.18

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 :

Because grantees are utilizing existing equipment to access the RSA-MIS for data entry, there are no additional equipment or maintenance costs. See response to question 12 for cost estimate.

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 data is being collected through the RSA-MIS, an existing system, and therefore there are no additional costs.

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).

The estimate related to the number of annual responses was adjusted to reflect the potential that every grantee eligible for reallocation could submit a reallocation form. Typically, only grantees requesting or relinquishing funds submit a grant reallocation form. Therefore, the estimates are based upon the maximum number of potential submissions. Additionally, the annual burden hours were incorrectly calculated for the current form. RSA has corrected this issue to reflect the accurate total.

- 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.**

Once the reallocation process is complete, any adjustments to the grantees award amount are available online from the Department of Education's Grant Award Database. The information is publicly available.

- 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.**

N/A

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

N/A