

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. Explain the circumstances that make the collection of information necessary

The National Network of University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDDs) is a discretionary grant program that supports the States in the operation and administration of a national network of UCEDDs that are interdisciplinary education, research, and public service units of universities or public or not-for-profit entities associated with universities that engage in core functions.

Section 104 (a) (42 USC 15004) of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act) directs the Secretary of Health and Human Services to develop and implement a system of program accountability to monitor the grantees funded under the DD Act of 2000. The program accountability system must include UCEDDs authorized under Part D of the DD Act of 2000. Section 154 (e) (42 USC 15064) of the DD Act of 2000 includes requirements for a UCEDD Annual Report. The UCEDD Annual Report should contain information on progress made in achieving the projected goals of the Center for the previous year, including:

- (1) The extent of goal achievement;
- (2) A description of the strategies that contributed to achieving the goals;
- (3) The extent goals were not achieved, a description of factors that impeded the achievement; and
- (4) An accounting of the manner in which funds paid to the Center under this subtitle for a fiscal year were expended; information on proposed revisions to the goals; and a description of successful efforts to leverage funds, other than funds made available under the DD Act.

The DD Act also states grantees must report on data collected regarding the following consumer satisfaction with:

- (1) The advocacy, capacity building, and systemic change activities initiated by the UCEDD;
- (2) The extent to which the UCEDD's advocacy, capacity building, and systemic change activities provided results through improvements; and
- (3) The extent to which collaboration was achieved in the areas of advocacy, capacity building, and systemic change.

Currently, UCEDDs engage in four broad tasks: conducting interdisciplinary training, promoting exemplary community service programs and providing technical assistance at all levels from local service delivery to community and state governments, conducting research, and disseminating information to the field. Public Law No. 108-447, the Consolidated Appropriations Act of 2005, supports the expansion of the national network of UCEDDs. There are 67 UCEDDs throughout the United States with at least one or more in every State and Territory, as mandated.

2. Indicate how, by whom, and for what purpose the information is to be used.

The information provided in the Annual Reports from the UCEDDs combined with information reported by the State Developmental Disabilities Councils, Protection and Advocacy agencies to develop and submit at least once every 2 years. The report describes the goals and outcomes of programs supported under the DD Act and are submitted to the President, Congress, and the National Council on Disability.

In addition, the information derived from data collection activities will be used by multiple recipients for multiple purposes:

- (1) As a tool for UCEDD grantees to measure and report on progress in reaching goals and identify areas for which revisions are indicated;
- (2) To enhance the Federal project officers' monitoring of UCEDD progress in reaching projected outcomes;
- (3) To provide a set of standardized performance measures that will yield a national portrait of UCEDD program impact;
- (4) To streamline the Administration for Children and Families and the Department of Health and Human Services reporting to Congress on accomplishments and progress toward reaching program goals.
- (5) For Congress and the Administration in making funding and appropriation decisions with regard to the UCEDD program.

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. Also, describe any consideration given to using technology to reduce burden.

The Administration on Disabilities (AOD) within the Administration of Community Living (ACL) collects data via the National Information Reporting System (NIRS) a web-based system developed by the Association for University Centers on Disabilities (AUCD). The instrument guides the development of items to be included in NIRS for reporting purposes.

4. Describe efforts to identify duplication.

There is no similar information available. Individual UCEDDs collect annually data on some of the information being requested; however, all UCEDDs have not produced material in a uniform format and in response to the requirements of the DD Act of 2000.

Moreover, because the collecting and reporting on the data being requested is based on the area(s) of emphasis chosen by each UCEDD and because these in turn were required to reflect particular needs of the state in which the UCEDD is located, duplication is unlikely.

UCEDDs will use the Annual Report template to report on Government Performance and Results Act (GPRA) measures. In the case of the GPRA measures, ADD has coordinated data collection efforts with the Maternal and Child Health Bureau (MCHB). MCHB funds Leadership Education in Neurodevelopmental and Related Disabilities (LEND) grants at 34 of the 67 UCEDDs in the Network. This overlap in funding could lead to duplication in the collection of data. To avoid this potential for duplication, ADD worked with AUCD and MCHB to identify common GPRA measures that could apply to both programs. The GPRA measures that appear on the Annual Report template for the UCEDD program reflect two measures that are currently used by MCHB for the LEND program.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information to be collected does not involve or result in assignment of burden to any small business or other small entity. The data will be collected from 67 UCEDD grantees. UCEDDs as defined, in Section 153 [42 USC 15063] of the DD Act, are interdisciplinary education, research, and public service units of universities, or public or nonprofit entities associated with universities that engage in four core functions: interdisciplinary pre-service education, community service training, research and information dissemination and address either directly or indirectly one or more areas of emphasis.

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.

Section 154(e) of the DD Act of 2000 requires annual reporting. Less frequent collection of data to be included in reports would violate statute. Furthermore, the data to be provided will enable timely monitoring of grantee activity and revision of goals if projected goals and outcomes are not being met.

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 circumstance requirements.

The proposed GPRA measures require that the UCEDD program survey their former trainees at 2, 5, and 10 years post-training. The UCEDDs will have to maintain confidential records for their trainees for more than 3 years to ensure they are following the data collection schedule. The records to be maintained by the UCEDD will contain information about an individual's education, employment history, and demography. Individual records will be protected through a coding system.

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.

A 60-day Federal Register Notice published on March 4, 2020 in 85 FR 12787-12788, ACL received five public comments from the comment period.

OMB Number: 0985-0030

National Network of University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDDs)

A 30-day Federal Register Notice posted public inspection on May 29, 2020 in 85 FR 11685 and published on June 1, 2020; this IC was submitted to OMB on date of public inspection notice prior to May 31, 2020.

Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

Five public comments received from UCEDDs Directors and/or Associate Directors.

Comment #1

- a) Based upon experiences where the estimated number of hours was very substantially less than the number of UCEDD hours invested in reporting, the estimated number of hours to adapt to and maintain the revised system seems quite low. For example, grantees' internal data collection methods will require substantial revision. All faculty, staff and trainees will need training in their new documentation responsibilities. Each year, training will be repeated for new faculty, staff, and trainees.
- b) The information published in the Federal Register estimates that data collection will take 143 hours. This has not been the IOD's experience. The IOD estimates that over 1,000 hours are spent annually entering data and creating IOD reports for ACL and AIDD. Although the work required is significant, we appreciate. Despite these recent improvements, an assessment of the proposed changes to the reporting requirements of the PPR predicts a net increase in effort in order to be in compliance.
- c) Our current estimated time burden for data collection, entry, cleaning and analysis as well as report writing annually is ~1,200 hours for the PPR. This does not include writing the 5-year report. We estimate that it would take us an additional 40-60 hours to write the 5-year report, increasing the total estimated time burden for 5-year reporting years to almost ~1,300 hours.
- d) Furthermore, reporting of the intermediate outcomes for Research, in particular, will be onerous for researchers who already have substantial reporting and publication requirements specified in their grants and contracts. This requirement seems redundant with the required reporting of publications.

Response #1

ACL has reviewed and accepts your recommendations.

- The estimated burden hours will be corrected in the 30 – day FRN public call for comments.
- In response to the concern about reporting intermediate Research outcomes, the 5-year report language will be amended to require a Research impact statement replacing the case example requirement. ACL will use the impact statement for communication, collaboration, and other purposes.

Comment #2

The following paragraph from Part 1.a. Detailed Work Plan Progress Report (annual report) seems to refer to future activities (e.g., “individuals who will work”) and therefore is very confusing as an aspect of a report on progress in a past year.

Response #2

- ACL reviewed and will delete the confusing paragraph in Part 1.a from the final five-year report template of the Work Plan Progress Report.

Comment #3

- a) AUCD would need to overhaul NIRS to ask all required questions and to provide single-year and cumulative reports summarizing the data. They would need a way to track issues encountered by grantees as they try to input the data into NIRS, and develop FAQs to respond to the issues.
- b) Additionally, as we begin to think about the IOD’s 5-year report, significant cost and time savings could be realized if an intuitive and efficient structure for the 5-year report could be built into NIRS.
- c) Recommend building the 5-year report into the NIRS system to ease reporting burden of our and other UCEDDs’ having to create our own templates for reporting.
- d) Currently, evaluation and demographic information of participants in all core functions must be manually entered into NIRS after completion. This is time consuming and leaves room for missing data and error data. Building electronic forms that would allow UCEDDs to collect their evaluation data directly in NIRS would be very helpful in reducing data error and time spend on data entry. Recommend development of customizable e-forms within NIRS by AUCD to support UCEDDs in collecting their evaluation within NIRS.

Response #3

- The UCEDD Resource Center at AUCD will meet this need.

Comment #4

Overall, the proposed questions (especially those to be answered in narrative form) do help to highlight significant outcomes, and the extent to which each UCEDD has successfully performed its core functions, independent of project-specific outcomes.

We do have some concerns regarding (1.b.1). *Discuss CAC involvement in evaluating UCEDD activities, and in the development and review of the final program progress report.*

At every CAC meeting, we provide updates on the UCEDDs activities, where CAC members are encouraged to comment and make suggestions. An in-depth annual report is provided at our full-day in person CAC meeting every November. If that coincides with a 5 year renewal application earlier that year, then a 5 year cumulative report is shared.

Previously, there has been no requirement for CAC members to be directly involved in the development of this report. Essentially, this is a technical report, aggregating 5 years' worth of NIRS data with additional narrative and impact statements. As such, we feel it is both burdensome and somewhat irrelevant to involve the CAC in the development of a report that is submitted to AoD. Rather than ask about CAC involvement in the development, perhaps it would be more beneficial and direct to require that CAC members be surveyed about their experiences and satisfaction with the structure and function of their respective CACs over the preceding 5 years.

Response #4

- Regarding section (1.b.1): ACL reviewed and accepts your recommendation to delete the requirement for CAC involvement in the development of the final five-year report.

Comment # 5

Recommend ensuring enough time is allocated between the year 5 annual report due date and the due date of the overall 5-year report.

Response #5

- The year 5 annual report is due July 30 and the 5–year closeout report is due 90 days after the end of the grant period or September 30 for time allocation.

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 offered to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There are no assurances of confidentiality. None of the data entered into NIRS is confidential or personally identifiable information in NIRS. Information collected is not for any purposes other than statistical; any information disclosed will not be not identifiable.

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.

In the collection of information for the Annual Report, UCEDDs will not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. In addition, respondents will not be asked questions related to community activities of a character which indicate:

- (1) Political affiliation and attitudes;
- (2) Mental and psychological problems potentially embarrassing to respondents;
- (3) Sex behavior and attitudes;
- (4) Religion and indicators of religion;
- (5) Illegal, anti-social, self-incriminating and demeaning behavior;
- (6) Critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; and
- (7) Legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; and records describing how an individual exercises rights guaranteed by the First Amendment.

12. Provide estimates of the hour burden of the collection of information.

Based on UCEDD reporting experience, current data and reporting efforts constitute approximately 1,462 burden hours per grantee for a total of 97,954 hours. The estimated burden hours result from data collected by the UCEDD technical assistance provider for the previous data collection and grantee experience in obtaining and providing data. The table below outlines the estimate for the hours of burden associated with the collection of information.

Estimated Total Annual Burden Hours: 97,954

Respondent/Data Collection Activity	Number of Respondents	Responses Per Respondent	Hours Per Response	Annual Burden Hours
UCEDD Annual Report	67	1	1,462	97,954

The estimates in the following table were calculated using the mode for the hourly rate paid to individuals performing each task, a mean cost by task across UCEDDs, and a fringe rate of 100%. The table outlines the estimated annual cost associated with the burden.

	# Hours Dedicated to Task		Hourly Rate Of Task		Totals	
	Mean	Range	Mean	Range	Average Effort Per Center	Across the Network (Average Effort x 67 Centers)
CURRENT ANNUAL EFFORT						
Design of data collection tools Computer Systems Analyst	23	1-50	44.05	\$24-65	\$1013.15	67,881
Staff training on data collection and entry Training and Development Manager	60	20-110	50.88	\$29-68	\$3,052.8	204,538
Data gathering & verifying Computer User Support Specialist	759	200-2,184	25.52	\$16-41	\$19,734.4	1,322,178
Data entry & cleaning Computer User Support Specialist	570	380-820	25.52	\$16-41	\$14,546	974,582
Subtotal	1,412	728-2,706			\$38,346	\$2,569,182
Fringe Rate 100%					\$38,346	\$2,569,182
Total Current Burden					\$76,692	\$5,138,364

The above figures related to the percentage of hours dedicated to different tasks were developed from information gathered by the UCEDD technical assistance provider for the previous data information collection request. The data collection has not changed, so the table assumes no change to the estimated breakdown among categories. The cost figures have been updated to reflect changes in salary since the last information collection request.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no out of pocket expenditures resulting from this collection of information.

14. Provide estimates of annualized cost to the Federal government.

The computation is based on an estimated \$35 per hour for the efforts of a program specialist. This rate includes fringe benefits.

Program specialists will devote an estimated 80 hours per year to review, analyze, and report on the information provided. With 67 grants currently being monitored, the estimated annualized cost would be $67 \times 80 = 5360$ hours \times \$35/hour = \$187,600.

15. Explain the reasons for any program changes or adjustments.

There is an adjustment increase of 3,350 annual burden 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.

Results from the collection of information will be used by AoD to monitor an individual UCEDD's performance using measurable goals; measures of improvement, consumer satisfaction, and collaboration; and GPRA measures. This individual monitoring activity will not be published.

Data collected from across the UCEDDs on the measures of improvement, consumer satisfaction, and collaboration and the GPRA measures will be tabulated and reported in aggregate form in bi-annual reports to Congress and in annual GPRA reports. The timeline and tabulation procedures are outlined below:

- Data will be collected throughout the UCEDD fiscal year (July 1 to June 30). All data must be entered into the NIRS system by June 30. No data will be accepted after that date.
- Reports are due 30 days after the close of the UCEDD fiscal year (July 30).
- AoD will tabulate the measures of improvement and consumer satisfaction data once the 67 UCEDDs have submitted Annual Reports. Raw data will be stored in a data file (e.g., Microsoft excel, Microsoft access) for each measure of improvement and consumer satisfaction. Once all data has been entered, AoD staff will tabulate the measures of improvement and calculate overall percentages for the measures of consumer satisfaction.
- AoD will also tabulate the GPRA measure by entering raw data for the GPRA

OMB Number: 0985-0030

National Network of University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDDs)

measures into a data file (e.g., Microsoft excel, Microsoft access). AoD staff will calculate the overall percentages for the GPRA measure.

- The tabulations and calculations of the data will be completed by November 30.

17. 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.

Not applicable

18. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable