SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB Number: (0985-0042)

# A. Justification

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

The Administration for Community Living (ACL) of the U.S. Department of Health and Human Services (HHS) requests clearance for the revision and renewal of a data collection instrument, Office of Management and Budget (OMB) Control Number 0985-0042, to be completed by grantees under the Assistive Technology Act of 1998, as amended (Public Law 108-364).

The information collected through this data collection instrument is necessary for ACL and states to comply with Sections 4 and 7 of the Assistive Technology Act of 1998, as amended (AT Act). ACL is requesting a reinstatement with change of the annual data collection instrument (OMB No. 0985-0042).

*Section 4 Requirements Necessitating Data Collection*

Section 4 of the AT Act authorizes grants to public agencies in the 50 states and the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Marianas (states and outlying areas). With these funds, the 56 states and outlying areas operate “Statewide AT Programs” that conduct activities to increase access to and acquisition of assistive technology (AT) for individuals with disabilities and older Americans. These comprehensive activities are divided into two categories: “State-level Activities” and “State Leadership Activities.”

According to Section 4 of the AT Act, as a condition of receiving a grant to support their Statewide AT Programs, the 56 states and outlying areas must provide to ACL: (1) applications and (2) annual progress reports on their activities.

Applications: The application required of states and outlying areas is a three-year State Plan for Assistive Technology (State Plan for AT or State Plan) (OMB No. 0985-0048). The content of the State Plan for AT is based on the requirements in Section 4(d) of the AT Act. As a part of this State Plan, Section 4(d)(3) of the AT Act requires that states and outlying areas set measurable goals for addressing the assistive technology needs of individuals with disabilities in education, employment, community living and information technology/telecommunications.

Every state and outlying area is required to include a minimum of seven prescribed measurable goals in its State Plan. These seven goals apply to all states and outlying areas in order to aggregate information on performance of the program at the national level. National aggregation of data related to these goals is necessary for the Government Performance and Results Modernization Act of 2010 (GPRAMA) (Public Law 111-352), as well as an Annual Report to Congress (see “Section 7 Requirements Necessitating Collection” below). Therefore, this data collection instrument provides a way for all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands to collect and report data on their performance in a consistent manner, including a uniform survey to be given to consumers. This uniform survey is included as part of the data collection package.

Annual Reports: In addition to submitting a State Plan every three years, states and outlying areas are required to submit annual progress reports on their activities. The data required in that progress report is specified in Section 4(f) of the AT Act.

*Section 7 Requirements Necessitating Collection*

Section 7(d) of the AT Act requires that ACL submit to Congress an annual report on the activities conducted under the Act and an analysis of the progress of the states and outlying areas in meeting their measurable goals. This report must include a compilation and summary of the data collected under Section 4(f). In order to make this possible, states and outlying areas must provide their data uniformly. This data collection instrument was developed to ensure that all 56 states and outlying areas report data in a consistent manner in alignment with the requirements of Section 4(f).

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

As stated above, ACL will use the information collected via this instrument to:

(1) Complete the annual report to Congress required by the AT Act;

(2) Comply with reporting requirements under the Government Performance and Results Modernization Act of 2010 (GPRAMA) (Public Law 111-352); and

(3) Assess the progress of states and outlying areas regarding measurable goals in their State Plans for AT.

Data collected from the grantees will provide a national description of activities funded under the AT Act to increase the access to and acquisition of AT devices and services through statewide AT programs for individuals with disabilities for use by Congress, the Department, and the public. In addition, ACL will use this data to inform its program management, monitoring, and technical assistance efforts. States will be able to use the data for internal management and program improvement.

1. **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.**

The annual AT Act data collection is submitted electronically as an online survey. Using the Center for Assistive Technology Act Data Assistance (CATADA), states complete their annual reports via the Internet by entering data into fields, choosing from drop-down menus, selection via “check boxes,” and narrative. Paper versions of the plan are neither required nor accepted unless there is a technological barrier to using the online system. CATADA will serve not only as the venue for submitting the data electronically, but also functions as a database to allow both ACL and the public to access information.

Since a web-based data collection system is currently in place, a proposed update to the system will be implemented based upon the instrument submitted for review. The paper version of the instrument translates directly into a web-based format. Throughout the document, there are numerous references to how certain sections and items are used in the electronic system. Upon OMB approval of the paper version, the web-based application for use by the states will be implemented by HHS at ACL. Once updated, the system will meet or exceed the requirements for accessibility of Section 508 of the Rehabilitation Act of 1973, as amended (The Act) and other applicable statutes and regulations, and industry standards.

This web-based system allows all 56 grantees—50 U.S. states, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands and territories to enter and submit their data electronically at their convenience on an ongoing basis. Where appropriate, the system automatically generates totals and does other automatic calculations, saving time and reducing the chance of mathematical errors.

ACL will have immediate access to the information submitted, allowing ACL to identify which grantees have submitted their data. This access will allow ACL to generate reports, even on partial data, as requested by Congress or others. States will have similar access to their data for management purposes.

1. **Describe efforts to identify duplication.**

This data collection instrument is unique to section 4 of the AT Act and does not duplicate other data collection efforts. When possible, terminology, definitions and other features of this instrument are aligned with data collection instruments already used by AT Act grantees for other purposes.

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

This information collection does not involve small businesses and will not have a significant impact on substantial numbers of small entities.

1. **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.**

If this information is not collected, neither ACL nor states can fulfill their reporting obligations under the AT Act. Those obligations are annual, so the data collection cannot occur less frequently than annually.

1. **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;**

None.

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

None.

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

None.

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

None.

* **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;**

None.

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

None.

* **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**

None.

* **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.**

None.

1. **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.**

**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.**

The revision of the annual AT Act data collection instrument published a 60-day FRN in the Federal Register Vol. 85, No. 188, pg. 6083, on September 28, 2020. There were 32 public comments. A 30-day FRN published in the Federal Register Vol. 86, No. 2, pgs. 310-312 on January 5, 2021.

**Efforts to consult with persons outside the agency**

The Center for Assistive Technology Act Data Assistance (CATADA), the project responsible for coordinating the development of the current instrument, conducted face-to-face or virtual meetings on these dates:

February 2018

Presented a review of all data elements and solicited suggestions for revisions from representatives of the State Grant for AT programs of various types at the conference. June 2018

CATADA sent an email to all grantees that included an initial draft of proposed data element revisions and requested feedback from the AT grantees.

September 2018

The State Grant for AT programs provided suggestions for general revisions of the data collection system and CATADA facilitated a webinar in on the updates to the proposed data collection instrument and reminded grantees to respond and provide additional feedback on the instrument.

January 2019

CATADA facilitated a face-to-face meeting in at the Assistive Technology Industry Association Conference to review proposed revisions and additional grantee feedback.

March 2019

Face-to-face presentation in Washington, DC on the proposed revisions to the instrument.

October 2020

CATADA facilitated a webinar in on updates proposed to the AT APR instrument. ACL staff participated in all meetings. The current instrument addresses the suggestions and feedback of the State Grant for AT programs.

November 2020

ACL presented on an ATAP webinar to the State Grant for AT programs on the proposed updates to the AT APR instrument and received input from state AT programs.

**Comments in Response to the 60-day Federal Register Notice**

Public comments received during the 60-day FRN comment period.

Proposed change in State Financing Activities: Financial Loan – partnership loans reported with no guarantee or interest buy-down have narrative description added to document subsidy/investment.

Comment Summary: Two State AT Act Program grantees commented in support. One organization representing the State AT Act Programs requested clarification.

*ACL Response: Sentence identified as confusing has been deleted in the AT APR - IC document.*

Proposed change in Reuse: Exchange – option for automatic exclusion of exchange recipients from performance measure data collection eliminated.

Comment Summary: Two AT grantees commented in support. One AT organization requested clarification.

*ACL Response: Clarification text has been added into the AT APR - IC document.*

Proposed change in Device Loan – separate type of borrower and type of device data reporting tables by purposed of loan.

Comment Summary: Three AT grantees commented in support. One requested clarification of timeline for implementation.

*ACL Response: No changes made. ACL will clarify the timeline for implementation to begin with federal fiscal year 2022, with first data collection October 1, 2021 to provide time for data system revision.*

Proposed change in Device Demonstration – separate decision-making participant from other participants reported in participant type table.

Comment Summary: Three AT grantees commented in support. Two AT grantees and one AT organization commented in opposition with two saying this is duplicative data reporting and one saying it is understood that an individual with a disability is the decision-maker unless unable to be and then it is the caregiver/provider role. One grantee requested clarification of the timeline for implementation.

*ACL Response: The proposed change is designed to support data fidelity by ensuring the decision-maker is identified by type within what can be a larger number of participants reported for each demonstration event. Currently all participants are reported by type. As a result, this change does not duplicate or increase data reporting burden. It only separates the decision-maker participant type reported from the type or types reported for all other participants. No change is made. ACL will clarify the timeline for implementation to begin with federal fiscal year 2022, with first data collection October 1, 2021 to provide time for data system revision.*

Updated Outcome Measures – Overall acquisition and access performance measure tables and consumer satisfaction tables updated to align with outcome/output data and targets used by ACL for program evaluation and budget justification since FY18.

Comment Summary: Two AT grantees and one AT organization requested clarification.

*ACL Response: Clarification has been added to the AT APR – IC document.*

Proposed new data elements in Public Awareness and Information & Assistance –

New question added for description of partnerships as part of public awareness, new data table added to report how individuals learned about the AT Program, new information request in Notes for description of partnerships that increase referrals.

Comment Summary: ACL received 7 comments on these changes and new data element.  Five AT grantees and one AT organization commented in opposition to these changes and the new data element. One AT grantee noted that collecting referral source data for information and assistance contacts will be a beneficial data point for identifying areas of both strong and weak connections and partnerships for State AT programs. This grantee suggested that clearer instructions are needed and a throughout review of all possible referral sources. One AT grantee and AT organization suggested that social media should be included in the various outreach strategies that are tracked. One AT grantee suggested that an alternative is to view the APR and/or data on the CATADA website could be used to glean public awareness approaches and strategies successfully implemented by AT Act programs. All commenters expressed concern about lack of clarity and five AT grantees and one AT organization expressed significant new data burden (both for AT Programs and consumers) associated with the proposed new data collection requirements. Commenters suggested these new data elements be removed and requested ACL work with AT Act grantees to determine the most efficient and effective way to report referral source data in a future information collection. *In a November 2020 meeting with state AT programs, grantees commented that they have been trying to collect this data but experience challenges as people don’t always know or recall the type of organization that referred them to the state AT program. Two states and one AT organization suggested that the information be collected during outreach events.*

*ACL Response: ACL is appreciative of the participation of AT stakeholders in the Federal Register Notice comment process and values the submission of comments on the proposed updates to the Public Awareness and Information and Assistance sections of the AT APR data collection instrument. ACL has modified this collection item to be two narrative descriptions. The first narrative description will reflect a qualitative assessment of outreach and education and the types of referrals that increased as a result of that effort.  The second narrative description will reflect a description of the types of entities across the state that are referring individuals to state AT programs for information and assistance. The information reported will be valuable in understanding the types of referral sources and identifying opportunities to build and/or strengthen partnerships to expand awareness of state AT programs and serve those with disabilities across all geographies in a state.    Simultaneously, ACL is convening a work group of AT grantees and AT organizations to identify the most efficient and effective way to collect referral source data in the Information Collection.*

State Improvement Outcomes – new optional section added to collect data on coordination and collaboration with two new required narratives and associated drop-down menu data.

Comment Summary: Two AT grantees commented in support.

*ACL Response: No changes made.*

Leveraged Funding – eliminated Section B and folded data into Section A to simplify.

Comment Summary: Two AT grantees commented in support.

*ACL Response: No changes made.*

Instruction Manual – deleted redundant text and updated AT Taxonomy.

Comment Summary: Three AT grantees commented in support.

*ACL Response: No changes made.*

1. **Explain any decision to provide any payment or gift to respondents.**

No payments or gifts are provided to respondents.

1. **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.**

There are no assurances of confidentiality for individual consumers receiving services from a State Grant for AT program is assured. The states will not report information that identifies individual consumers. States will provide anecdotes about the effect of their programs on individual consumers, but states are instructed to write anecdotes in a manner that ensures their anonymity. All other data provided is reported in the aggregate.

The web-based system used for this instrument will not allow public access to the reporting instrument for data entry, and states will have access to their data only. They will not be able to see or manipulate data of other states. Individual state reports will be kept confidential until they have been finalized by the state and accepted by ACL.

Once a report has been finalized by the state and accepted by ACL, access to the aggregated state-specific and national data will be available to the public via the Internet. However, while the public will be able to view the data, they will not be able to alter the data. States will be advised that their data will be available to the public in this manner.

1. **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.**

None of the questions included in the data collection instrument are considered sensitive.

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

* **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

This information collection has 3 pieces:

(A)  A web-based system that collects data from states.

(B)  A performance measurement survey that states collect from individuals

(C)  A customer satisfaction survey that states collect from individuals.

(A) Fifty-six grantees report to ACL using the web-based data collection system.  A workgroup of grantees estimated that the average amount of time required to complete all responses to the data collection instrument is 80 hours annually.  The estimated response burden includes time to review the instructions, gather existing data, and complete and review the data entries. These estimates are based on the experience of staff who implement these programs at the state level. In addition, we project that clean-up and clarification of data elements will require no change in data burden estimates.

(B) The fifty-six grantees ask consumers to complete surveys that provide information on their performance related to the state’s measurable goals. Historical data from states indicates that the average state will ask for this information from 3,242 consumers at 1 minute per consumer to complete the question survey, for a total of 54 hours annually.

(C) The fifty-six grantees also ask consumers to complete customer satisfaction surveys. Historical data from states indicated that the average state asks for this information from 3,242 consumers at 1 minute per consumer, for a total of 54 hours annually.

Therefore, the combined burden of completing the data collection instruments and related surveys is 188 hours (80 + 54 + 54) per grantee and 10,528 for all grantees.  In discussions with program directors, it was agreed that at least one staff person would need to dedicate four hours each week to all three data collection instruments for 208 hours per grantee and 11,648 nationally. (The 52-week estimate includes the additional hours of data entry required at the end of each reporting cycle.) This brings the overall national burden to 22,176 hours annually.

Program staff also estimated the average recordkeeping burden at 8 hours per year for a total of 448 hours. Therefore, the total annual reporting and data collection burden would be 22,624 hours.

Assuming an average hourly cost of $35 per hour for staff members who complete the instrument, plus 100% for benefits and overhead, the total cost burden for individual grantees is estimated to be $28,280 annually, and the total cost of data collection for the 56 grantees is estimated to be $1,583,680 annually. The average hourly cost of $35 represents the average of several different classes of labor ranging from clerical to managerial labor and accounts for the amount of time different types of grantee personnel (i.e., clerical, technical, professional and managerial) are expected to expend on the project.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Number of  Responses | Hours Per  Response | Annual  Burden Per Grantee | Total Annual Burden Hours | Average Cost Per Hour | Total Cost |
| Work-Based  System | 56 | 1.428 | 80 | 4,480 | $70.00 | $313,600 |
| Performance  Measurement | 3,242 | 0.01666 | 54 | 3.024 | $70.00 | $211,680 |
| Customer  Satisfaction | 3,242 | 0.01666 | 54 | 3,024 | $70.00 | $211.680 |
| **Subtotal** |  |  | **188** | **10,528** | **$70.00** | **$736,960** |
| Program Support | 56 | 4 | 208 | 11,648 | $70.00 | $815,360 |
| Record Keeping Burden | 56 | 0.14286 | 8 | 448 | $70.00 | $31.360 |
| **Subtotal** |  |  | **216** | **12,096** | **$70.00** | **$846,720** |
| **TOTAL** |  |  | **404** | **22,624** | **$70.00** | **$1,583,680** |

1. **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.)**

**Total Annualized Capital/Startup Cost:** **$0.00**

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

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**Total Annualized Costs Requested : $0****.00**

No costs are incurred by respondents other than those specified in item 12. There are no capital costs or equipment purchases necessary. Respondents only need to have a computer and internet access to complete the data collection report.

1. **Provide estimates of annualized cost to the Federal government.**

Section 6(b)(5) of the AT Act requires that ACL award a grant, contract, or cooperative agreement to an entity to assist states with data collection and reporting. The Center for Assistive Technology Data Assistance, CATADA, is responsible for developing the data collection instrument, providing training and technical assistance to states on use of the instrument, and assisting with writing the annual report to Congress based on aggregate data submitted. Subject to appropriations, ACL anticipates providing approximately $325,000 each year for five years to the recipient to perform the above data collection and reporting activities for the State Grant for AT programs, as well as data collection and reporting system training, technical assistance, and analysis for the submission of the State Plan for AT. The estimated annualized cost to the Federal government for the State Grant for AT data collection portion of the cooperative agreement is $175,500.

ACL employs one GS-14 management and program analyst at $58.13 an hour with the responsibility for the administration of grants funded under the AT Act. The above staff dedicates a percentage of time to this data collection totaling approximately 100 hours annual. The estimated annualized cost of salaries to the Federal government for ACL staff time is $11,626. Total cost to the Federal Government is $186,636 annual.

[[1]](#footnote-1)GS-14 at a rate of $116.26 X 100 annual hours= $11,626

The Center for Assistive Technology Data Assistance, CATADA=$175,000

Total Cost= $186,626

1. **Explain the reasons for any program changes or adjustments.**

**List of Updated Explanations**

The following identifies revisions to the Data Collection Instrument by page number for the State Grants for Assistive Technology Program Annual Progress Report (AT APR).

State Financing: Financial Loan – page 5-6 (no new data, explanation of existing data)

Revised description of revolving and partnership loans with clarification that financial loans with no buy-down and no guarantee require documentation of the subsidy and/or investment of the financial loan program in those loans. Documentation can be that those loans all have a low interest rate (prime or less). If loans are not low interest, then other documentation much be provided to demonstrate the subsidy provided and/or investment of the financial loan program in those loans.

Reuse: Exchange and Refurbish/Repair – page 14-15 (no new data element)

Eliminated the option to automatically exclude any/all exchange recipients from performance measure when there is no clear investment/role of the AT program in the exchange. Only exchange recipients that can be excluded are those who otherwise have an obligation to provide the AT and cannot legitimately respond to the performance measure. This is the exclusion that uniformly applies to all acquisition activity recipients. AT programs can continue to implement online exchange programs with no direct intermediary role but will need to decide how to collect legitimate performance measure data to report those completed exchanges in the APR.

Device Loan – page 21 (reconfiguration of existing data)

Separated type of borrowers (Section B) and type of AT device (Section D) by decision-making and all other purposes. This will allow for better oversight of data fidelity and will help align data with the two performance measure calculations.

Device Demo – page 26 (reconfiguration of existing data)

Separated decision-maker from all other device demonstration participants (Section B). This will allow for better oversight of data fidelity and emphasize identification of one decision-maker who provides the performance measure data.

National Outcome Measure Tables – page 28-29 (no new data, all auto calculated)

Clarified overall acquisition and access performance measure tables alignment with data reported with ACL budget and targets apply only to national aggregate data. Tables will not be included as part of individual grantee APR. There is no new data to collect/report in association with these tables; all cells are system generated from previous data entered by activity with those calculations unchanged.

Training: Topics – page 32 (no new data, clarification of categories)

Revised the combination topic to be only AT products and Funding/Policy. Any training on ICT accessibility should be reported as such and a performance measure collected.

Public Awareness/ Information & Assistance (I&A) – page 37-39 (new data collection elements)

New question added for description of partnerships as part of the narrative public awareness activities data reporting element.

New data table added to report how individuals learned about the AT program.

New information request in Notes Section for description of partnerships that increase referrals.

Coordination/Collaboration & State Improvement Outcomes – page 40-41 (new data collection elements)

New section added to collect data on coordination/collaboration partnership initiatives with two new narrative description fields to answer a series of questions about the partnership initiative reported along with two new drop-down lists to provide associated metadata. This new data reporting section is optional.

Leveraged Funding: Activities not included in State Plan – page 41 (no new data)

Eliminated all of Section B. Very few grantees used this section in recent years and when they did it was typically an error. If leveraged funding is received to support an AT Act authorized activity that is conducted, then it should be included in the State Plan and APR data should be collected/reported. The reporting table has been revised by adding a yes/no choice for each leveraged funding amount that indicates if data was reported or not. If data has not been reported a narrative explanation is required. The Notes section has also been revised to prompt grantees to describe any leveraged funding that was received to support AT Act authorized activities that were not included in the State Plan and why such activities were not included in the State Plan. This should allow for all leveraged funding to be clearly reported.

Instruction Manual

Deleted entire Section III. Section Specific Instructions and Definitions as the majority of this content was already included in the Annual Progress Report for AT. Any definitions or other information in this Section of the Instruction Manual that was not already in the AT APR was added into the appropriate section.

Clarified in Geographic Distribution that international recipients or participants should not be reported.

Revised, clarified and updated all ten AT type taxonomy descriptions and decision rules.

1. **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**.

Upon Office of Management and Budget approval in 2021, ACL plans to formally transmit the approved AT APR to the State Grant for AT programs for data collection through September 30, 2021. ACL staff will review and approve all corresponding AT APRs by March 1, 2022. (The submission due date is December 31, 2021.) The AT APR data will be tabulated, verified for accuracy and published in ACL Reporting by May 1, 2022.

The aggregate, national data derived from this collection will be used to create an annual report to Congress. The format of this report responds to the requirements of Section 7(d) of the AT Act.

Because states receive grants every year, there is no end date for the reporting requirements. States will remain on a set reporting cycle, with the period beginning October 1 and ending September 30 each year. The due date for the completed annual data reports is December 31 and the deadline for ACL approval of the collection is May 1 of each year. Approved annual data reports will be posted on ACL’s website. No complex analytical techniques will be used.

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

ACL will display the expiration date for OMB approval of the information collection. See the Paperwork Burden Statement document.

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

There are no exceptions to the certification statement.

1. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB\_h.aspx [↑](#footnote-ref-1)