

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (Department) requests a revision to an information collection instrument for which approval expires on November 30, 2020. This is a web-based annual performance reporting form that is completed by grantees funded under the American Indian Vocational Rehabilitation Services (AIVRS) program, authorized under Section 121 of the Rehabilitation Act of 1973, as amended (Rehabilitation Act) (Public Law 114-95).

This information collection instrument is used to determine substantial progress for continuation funding and to meet the following statutory and regulatory requirements of the AIVRS program: 1) the submission of information in the Annual Report to Congress required by the Rehabilitation Act, 2) program planning efforts required under the Government Performance and Results Act (GPRA) of 1993 (P.L. 103-62) that describe the implementation of a comprehensive plan that includes goals and objectives for the program and measures the program's progress in meeting its goals and objectives, and 3) the submission of information on grantees' program activities toward meeting the goals and objectives of their approved grant application required by the Education Department General Administrative Regulations (EDGAR) 34 CFR 75.118 and 75.590.

The revised information collection instrument, for which RSA is requesting approval, is designed to fulfill all the above requirements and needs for the AIVRS program. Attachment 1 contains a Microsoft Word version of the revised form. Attachment 2 contains a side-by-side comparison of the proposed changes to the existing form, which will improve user friendliness, clarity, and accuracy of information reported. These revisions are not substantial or significantly different from the original collection but are proposed to provide clarity and consistency.

In many areas, the information collection language has been modified using direct language instead of passive terminology.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

RSA and the Department will use the information gathered annually to: (a) ensure that grantees comply with reporting requirements under EDGAR, (b) provide annual information to Congress on activities conducted under the program, and (c) measure performance on the program's GPRA indicators.

The following elaborates on (a) through (c) above.

(a) Ensure grantees comply with reporting requirements under EDGAR.

The information collected from the AIVRS grantees will provide a national description of the types of activities conducted to serve the vocational rehabilitation (VR) needs of American Indians with disabilities. This information will be used by RSA staff in desk and on-site monitoring of grantees. Further, grantees can use the information for their own evaluation purposes as they discuss, plan, generate support for, and implement AIVRS projects and VR services for American Indians with disabilities.

To provide the most accurate and comprehensive documentation of AIVRS activities, the form will collect information from the AIVRS grantees in the following areas:

Sections:

1. Budget Narrative
2. Project Goals and Objectives
3. Serving American Indians with Disabilities
4. VR Services
5. Employment/Educational Outcomes
6. Interaction with State VR Agency
7. Evaluation
8. Special Application Requirements

(b) Provide annual information to Congress on activities conducted under this program.

RSA will use the information collected in preparing its annual report to Congress, as required by the Rehabilitation Act of 1973, as amended. The information collected will help policy

makers better understand the barriers, opportunities, and outcomes involved in improving AIVRS services for American Indians with disabilities.

(c) Measure Performance on the AIVRS Program's GPRA Indicators.

The indicators for AIVRS that this information collection will address include:

1. Of all those exiting the program, the percentage of individuals who leave the program with an employment outcome after receiving services under an individualized plan for employment (IPE).
 - 2a. The percentage of individuals who leave the program with an employment outcome after receiving services under an IPE.
 - 2b. The percentage of individuals who leave the program without an employment outcome after receiving services under an IPE.
 - 2c. The percentage of individuals who have not left and are continuing to receive services under an IPE.
 3. The percentage of projects that demonstrate an average annual cost per employment outcome of no more than \$35,000.
 4. The percentage of projects that demonstrate an average annual cost of services per participant of no more than \$10,000.
- 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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The annual performance report is submitted electronically. The use of the web-based information collection form significantly reduces grantee burden in the following ways:

- The format is user friendly and requires minimal narrative.
- During year one of a grant, a grantee enters all relevant project information. In subsequent years, the system carries over the previously entered information, allowing grantees to make the necessary edits to the previously entered information. Grantees will not have to re-enter information from year to year, as was required in past years when paper forms were in use.

- The web system automatically calculates fields that require a sum or percentage.
- The system totals all numeric entries for an end-of-the year report.

The Management Information System (MIS) is a web-based information collection system. Advantages to RSA staff in using this type of dynamic database software are as follows: (a) immediate access to information submitted by grantees; (b) the ability to identify which grantees submitted completed forms (via the Internet); (c) generate reports, even from partial information, as requested by Congress or the Department; (d) ability to send emails to all grantees prior to the due date of performance reports; and (e) ability to send emails to grantees that do not submit performance reports by the due date.

The MIS complies with Federal Accessibility standards implementing Section 508 for Internet Applications, 36 CFR 1194.22, thus assuring full access to users with disabilities. The MIS also complies with all the U.S. Department of Education's security procedures.

- 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.**

The information is not otherwise available, and the form does not duplicate items from any other federal information collection efforts.

- 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.**

No small businesses or other small entities will be part of this information collection.

- 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.**

The proposed information collection instrument supports the following activities: 1) a report to Congress that is required on

an annual basis, and 2) GPRA information that is required to be collected from AIVRS grantees. If the information is not collected, information on key aspects of these programs for American Indians with disabilities will not be available. Consequently, RSA would not be able to meet the statutory and regulatory requirements for collecting and reporting information on the progress towards achieving the goals and objectives of grantees' approved grant applications.

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.**

The proposed revised information collection instrument does not require any of these special circumstances.

- 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.**

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published. 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.

The current AIVRS grantees were included in the development and revision of the performance reporting form. Changes recommended by AIVRS grantees were considered and those changes that were germane to the purpose of the ICR were accepted and included in the new performance reporting form.

On July 29, 2020, RSA published a 60-day Federal Register Notice (85 FR 45600) to provide an opportunity for the public to comment on this request for OMB approval of the proposed, revised, and continuing collections of information collection requirements. As a result of this notice, RSA received comments from three individuals; however, comments from two of those individuals are not germane to the purpose of this notice.

The third commentor submitted three comments. The first comment requested explanation for the omission of “exceeding the proposed numbers actually served during the reporting period” from the previous performance report. RSA determined that this data element was not necessary to determine substantial progress and this data element went unanswered in a large majority of reports submitted in the past. The second comment was related to data elements under the *Education Services* section since they were reduced and consolidated into the *Employment Outcomes* section. The concern was that there were no data elements to capture the higher education accomplishments of participants. RSA has

determined that the two remaining data elements regarding higher education are sufficient to allow the capture of higher education data. In addition, it was determined that the data previously being requested under *Education Services* was confusing to grantees and the data submitted is not tracked by the Department or reported in the Annual Report to Congress.

The third comment expressed concern related to the omission of “exceeding the proposed numbers achieving employment outcomes during the reporting period” from the previous performance report. RSA determined that this data element was not necessary to determine substantial progress and this data element went unanswered in a large majority of reports submitted.

This is the request for the 30-day Federal Register notice inviting public comment.

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 have been or are to be 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.¹ 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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

Only aggregate information will be collected. There is no personally identifiable information collected and no questions of a personal nature regarding individual program participants.

¹ 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)

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 for this current information collection request. The statement should:**

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

There are 86 grantees currently funded under the AIVRS program. Based on current reporting data, the 86 grantees need an estimated 9.0 hours to complete the annual performance report for an aggregate total annual burden of 774 hours.

The decrease in response burden hours is due to the following: 1) Grantees will receive the locked and fillable MS Word annual performance report directly from RSA staff via email; 2) Grantees will not be required to register and log into a web-based platform; and 3) Grantees will be able to email completed annual performance reports directly to RSA staff.

These changes described above demonstrate a reduction in response hours and cost per respondent. Therefore, for FY 2020-2023, the estimated annual cost for 86 AIVRS grantees responding to the information collection instrument, taking 9.0 hours each at \$57.66 per wage hour, is \$44,628.84, which is a decrease of \$10,841.16 for the total annual cost.

Estimated Annual Burden and Respondent Costs Table

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 Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
APR for Discretionary Grantees	N/A	100%	86	86	9.0	774	\$57.66	\$44,628.84
Annualized Totals			86	86		774		\$44,628.84

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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 :

This is an annual progress reporting form. No capital costs and no equipment purchases are necessary.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

RSA will host and maintain the performance report web site and reporting system on the Department's server. RSA employs information technology specialists who dedicate time for the update and maintenance of the AIVRS information collection instrument in the MIS system. In the FY 2017 information collection request for extension Supporting Statement, RSA estimated the annualized cost of operating the MIS system and the costs of personnel time for a total estimated cost to the federal government of \$62,325. Between FY 2017 and FY 2020, there was a 5.4 percent cost of living increase, therefore the estimated

annualized cost to the Federal government was adjusted accordingly. The estimated annualized cost of operating the system is \$5,969 in FY 2020. In addition, RSA program personnel time estimated for two supervisory managers, GS-15 at .5 percent of their time and two program managers, GS-13 at 20 percent, and one-half time of a program manager, GS-13 at 10 percent equals approximately \$49,501. The total estimated annualized cost to the Federal government is \$55,470.

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).**

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden	0	129	22
Total Responses	0		2
Total Costs (if applicable)	0		

This information collection includes an adjustment of hours due to a decrease in respondents and a decrease in hours due to a program change. The total number of respondents decreased from 88 respondents in the previous information collection to 86 current respondents for a total of a 22 hour reduction. Additionally, the changes to the information collection resulted in a 1.5 hour decrease in hours per response, from 11 hours to 9.5 hours per respondent, for a total of an aggregate 129 hour reduction for all 86 respondents. Therefore, between the 22 hour reduction resulting from two less respondents and the 129 hour decrease from the program change, the total burden hours reduced is 151 hours, from 968 hours to 817 hours. The program change was due to the clarity and consistency of language, which resulted in more

streamlined instructions, as well as removing data elements that are no longer needed in the information collection.

- 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.**

RSA staff will use the information collected from the annual performance reporting form to report annually to Congress and for program monitoring purposes. RSA will generate standard reports to meet requirements of the Rehabilitation Act, EDGAR, and GPRA. The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of RSA staff, ED staff, and Congress under provisions of the Rehabilitation Act, EDGAR, and GPRA. RSA will prepare these reports according to statutory and regulatory requirements. RSA will prepare other information tabulations on an as-needed basis to meet specific information needs.

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

The three-year expiration date for OMB approval will be displayed on the web-based MIS performance reporting form.

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

There are no exceptions to the certification statement.