

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.**

Under P.L. 114-95, Section 302 of the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA), and implementing regulations 34 CFR part 386 hereafter referred to as “The Rehabilitation Act,” RSA provides Long-Term Training grants to academic institutions that support scholarship assistance to scholars. Scholars who receive scholarships under this program are required to work within the public rehabilitation program, such as with a State vocational rehabilitation agency, or an agency or organization that has a service arrangement with a State vocational rehabilitation agency, in qualified employment fields, which include rehabilitation counseling, administration, supervision, teaching or research in vocational rehabilitation, supported employment, or independent living services to individuals with disabilities, especially individuals with significant disabilities. The scholar is required to work two years in such settings for every year of full-time scholarship support. The service obligation for the scholar who matriculated part time is based on the equivalent total of actual academic years of training received. The program regulations at 34 C.F.R. §§ 386.33-386.36 and 386.40-386.43 detail the payback provisions and the RSA scholars' requirements to comply with them.

Section 302(b)(2)(C) of the Rehabilitation Act requires that data on the employment of scholars supported under the RLTT grants are accurate, including tracking of scholars' employment status and location of former scholars in order to ensure that scholars are meeting the payback requirements.

Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, section 75.591) (20 U.S.C. 1221e-3 and 3474).

In addition to meeting the requirement that all scholars be tracked, the data collected will provide performance data relevant to the rehabilitation fields and degrees pursued by RSA scholars, as well as the funds owed if they do not fulfill their obligation through service and the rehabilitation work completed by them. These data are used to assess program effectiveness and efficiency, and to meet the reporting requirements of P.L. 103-62 Sec. 4, the Government Performance and Results Act (GPRA).

RSA is requesting an extension of the currently approved collection for grantees (institutions of higher education), scholars, and employers to submit data electronically through the online RSA Payback Information Management System (PIMS).

**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.**

To fulfill the requirements set forth in Section 302 of the Rehabilitation Act, grantees, scholars, and employers submit data to track scholars' service obligations. Grantees are required to track the education status of all scholars who receive financial support. This information includes information about cumulative support granted to RSA scholars, graduation dates or other information about scholars completing or exiting programs, scholar debt in years, program completion data for each scholar, and current contact information. Scholars submit data about their employment and employers and grantees verify whether the scholar was employed and if the position was considered eligible for service obligation fulfillment.

RSA will use (and currently uses) the information to assess grantees' compliance with the requirements of the RLTT program and to report to Congress on progress on meeting the purpose of training programs, including the RLTT program, which is to ensure that skilled personnel are available to provide rehabilitation services to individuals with disabilities through vocational, medical, social, and psychological rehabilitation programs.

The PIMS will continue to be used to collect the information necessary to analyze the program's impact, including characteristics of RSA scholars in the training programs, the number of RSA scholars entering the rehabilitation workforce, the rehabilitation fields being entered, the types of employment (e.g., State agency, nonprofit service provider, or practice group), and verification by the employer that the employment information is accurate. This information enables RSA to address the Congressional mandate to secure data based upon program compliance requirements and the annual evaluation of performance indicators. The current system will continue to provide RSA with reliable data and give RSA information regarding the program's performance and effectiveness on an ongoing basis.

**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.**

RSA collects all data in a web-based data collection system which is maintained on a secured server. Grantees and scholars log into PIMS using their email address and a password to enter data. Employers are provided secure links to review and verify employment. This online system has been used the last several years by grantees, scholars, and employers and has not posed a

hardship, and RSA does not anticipate that the continued use of a web-based system will present difficulty for the respondents. The system is designed to minimize burden on respondents by programmatically skipping inapplicable items and storing and displaying data previously entered. For many items, users simply review data previously entered and verify its continued accuracy.

**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.**

There is no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere.

**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.**

The information requested rarely involves the collection of information from small businesses. There may be some employers classified as small businesses; however, the Employment Verification Record was designed to solicit only the information necessary to respond to program and GPRA requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet Federal requirements for budget and program activity data. In addition, this system uses a secure online tracking system which allows employers to easily review information already entered by the scholar and then submit verification or provide revisions.

**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 information in this collection cannot be submitted less than annually because the Rehabilitation Act and its corresponding regulations require that data on payback be reported to RSA annually. PIMS allows grantees, scholars, and employers to report required information in a concise, consistent manner, and it is an essential tool in the monitoring of scholars' service obligation requirements. To require less frequent data collection would result in the inability of the Secretary to assure that grantees and scholars are complying with the statutory requirements.

In addition, RSA relies on this information annually for other functions, such as monitoring, provision of technical assistance, budget development, and mandated reports to Congress on performance standards related to program purpose.

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 only special circumstance that applies is the circumstance for retaining records for more than three years. RSA training grantees are required by statute to track, maintain, and report information on current RSA scholars until all scholars have completed their work obligations. It is the grantees' responsibility to maintain complete and accurate records on all scholars who receive financial assistance through RSA grants and to submit all required information to RSA on an annual basis. With an obligation of two years of work per year of scholarship assistance received, the majority of scholars must be tracked for four years or more. Failure to report information on both current and exited scholars may adversely impact a grantee's ability to receive future Federal grants.

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.**

Although there are no changes being made to the current system in use, this Information Collection was published in the Federal Register for comment the appropriate 60 days as required by 5 CFR 1320.8(d), prior to submission to OMB. There were no comments during the 60-day period.

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

There are no payments or gifts to respondents in support of the data collection.

**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.<sup>1</sup> 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**

<sup>1</sup> 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)

**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.**

All data collection activities are conducted in full compliance with U.S. Department of Education (Department) regulations. Data collection activities are conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the “Buckley Amendment,” Family Educational and Privacy Act of 1974, 20 USC 1232 g; The Freedom of Information Act, 5 U.S.C. 522; and related regulations, including but not limited to: 41 C.F.R. Part 1-1 and 45 C.F.R. Part 5b and, as appropriate, the Federal common rule or the Departments final regulations on the protection of human research participants. Adherence to these requirements maintains the confidentiality of data obtained on private persons and protects the rights and welfare of human research subjects as contained in the Department regulations. In accordance with the Privacy Act of 1974, a system of records notice (SORN) and Privacy Impact Assessment (PIA) have been published.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of individually identifiable information. In addition, the data collection system that PIMS is part of, the Personnel Development Program Data Collection System (PDPDCS), was reviewed by the Department’s Office of the Chief Information Officer (OCIO) for compliance with the Federal Information Security Management Act (FISMA), OMB Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. The system was most recently granted an Authority to Operate (ATO) on May 28, 2021.

**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.**

- Questions regarding Social Security number (SSN), employment status, and service obligation status may be considered sensitive. However, SSN, employment status, and service obligation status questions are necessary to directly respond to GPRA measures and program requirements for service obligation. In addition, the Department’s Accounts Receivables and Bank Management Division and the U.S. Department of Treasury require SSNs when scholars are referred because they did not repay their service obligation through eligible employment and must, therefore, repay part or all of the funding they have received. Given the sensitivity of the information being collected, a privacy statement is included on all relevant forms.

**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.**

Three different sources—the grantees, scholars, and employers—are asked to report or verify information about the scholar. The time taken by a scholar to complete the Scholar Training and Employment Record varies based on the individual’s employment. The approximate time required for grantees to complete the Scholar Record and for employers to complete the Employment Verification Record does not vary widely. For all respondents, much of the information in these forms is pre-populated and requires only verification.

**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)
Grantees			350	562	3.264	1,834.5	\$50	\$91,725
Scholars			3600	7,628	0.316	2,410.5	\$18.62	\$44,883.51
Employers			3600	3,600	0.17	612	\$50	\$30,600

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)
Annualized Totals			7,550	11,790		4,857		\$167,208.51

***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.***

The above table presents the **maximum** annual burden estimates of 4,857 hours for grantees, scholars, and employers. The program office estimates that 350 active grantees, 3,600 scholars, and 3,600 employers will respond to this collection annually. Given that scholars and employers are only able to submit and verify employment information once a scholar has exited the training program, not all scholars/employers will respond in any given year; so, for the purposes of estimating burden, we assume that roughly 3,600 scholars will be employed. The actual number of grantees, scholars, and employers may vary due to the availability of Federal appropriations, number of grant awards made, and the number of scholars recruited by each project. This is our best estimate taking these variables into consideration.

For burden estimates, we assume that grantee administrators and employers have an hourly rate of \$50. We assume an average hourly rate of \$18.62 for scholars. Given these rates and the hour estimates below, the maximum estimated annual burden is \$167,208.51 across all grantees, scholars, and employers. Below we describe how these estimates were derived for each instrument.

#### *Grantees: Scholar Record*

We estimate that 350 grantees will respond to this data collection instrument annually. The burden for grantees of completing the Scholar Record is estimated at 3.5 hours per grantee per year. This estimate includes an average of 15 minutes per scholar the grantee will spend entering and updating information each year. On average, each grantee has 14 active scholars at a time. In many cases, the grantee will be reviewing and updating information already entered.

#### *Grantees: Payback Agreement*

Project Directors must ensure that any scholar receiving scholarship assistance from the grant signs and dates a "payback" agreement **prior to the initial disbursement of any scholarship funds** on his/her behalf, including the payment or crediting of tuition. In addition, prior to granting each year of a scholarship, the grantee must ensure that each scholar signs a written agreement in which the scholar agrees to the terms and conditions set forth in the regulations (34 C.F.R. § 386.40). **The Project Director must fully disclose to the RSA scholar the terms and conditions of the payback requirement in the application for an RSA scholarship.** The



written agreement must contain the terms and conditions required by the regulations (34 C.F.R. § 386.40).

Project directors usually present information about their programs and explain the payback agreement during their program orientation, which typically takes place in a group rather than individual session. Group sessions are estimated to take 30 minutes to ensure scholars are well informed about the terms of the agreement and their responsibility.

Our estimate is based on the assumption that grantees meet with scholars in groups of 10 to explain the agreement, answer questions, and complete and sign the agreement with the scholars. Because the agreement is completed prior to the start of training, grantees primarily conduct this activity in the first and second years of their grant. We estimate that the current number of grantees that total 106 will need to conduct this activity a minimum of annually but will more likely conduct this activity twice per year, with an average of 19 scholars per grant. We are basing the calculation on twice per year.

#### *Grantees: Exit Certification*

The Exit Certification is a one-time form that is completed and signed by a scholar when he/she completes the grant training program or exits prior to completion. Grant Project Directors review the Exit Certification one-on-one with scholars, and we estimate the process to take approximately 15 minutes to complete.

Of the current 106 grantees, we estimate that each Project Director will need to conduct this activity annually with an average of 19 scholars per grant.

#### *Scholars: Scholar Training and Employment Record*

Per program regulations, scholars may begin fulfilling their service obligation through eligible employment after they have completed or exited the program. The number of scholars entering data in any given project year will vary but may be as many as 3,600 scholars. We anticipate that scholar burden will average 15 minutes per year per scholar.

#### *Scholars: Payback Agreement*

As noted above under the Grantee: Payback Agreement, the Payback Agreement is completed and signed prior to the scholar beginning the program and prior to receiving additional scholarship funds so the scholar can glean his/her total indebtedness. Each scholar may participate in an information session with his/her Project Director or be counseled one-on-one to discuss, complete and sign the agreement prior to the disbursement of the scholarship. We estimate that these sessions will last roughly 30 minutes and that roughly 19 scholars in 106 grants will conduct this activity as previously prescribed or contingent upon the availability of funds.

#### *Scholars: Exit Certification*

As noted above under the Grantee: Exit Certification, the Exit Certification is completed only once per scholar per grant. Each scholar will meet with his/her Project Director at the time he/she completes the program or leaves prior to completion. We estimate that it will take 15 minutes for each scholar to review, discuss, complete, and sign the Exit Certifications. To calculate the annual number of scholars who would need to complete the Exit Certifications, we estimate that roughly 19 scholars in 106 grants will conduct this activity upon exiting from their program of study each year.

*Employers: Employment Verification Record*

For employers, the scholar initiates employment verification annually; however, some scholars: a) exercise their allowable two-year grace period; b) are not employed in eligible employment; or c) enter deferment due to an approved reason or receive a waiver. Therefore, the number of employers asked to provide verification may be lower than the number of scholars that completed or exited the training grants. We anticipate the employers' burden to be 10 minutes per scholar per year.

Table A-1. Maximum Annual Burden Estimates, by Data Source

<b>Data Source (Frequency)</b>	<b>Estimated Number of Respondents</b>	<b>Estimated Annual Burden per Respondent (in Hours)</b>	<b>Estimated Annual Burden (in Hours)</b>	<b>Estimated Total Annual Cost (in Dollars)</b>
Grantees: Scholar Record (Annual)	350 grantees	3.5	1,225	\$61,250 <sup>1</sup>
Grantees: Payback Agreement (Once per scholar/grant; conducted in groups of ten scholars)	106 grantees (19 scholars enrolled/year)	1	106	\$5,300 <sup>1</sup>
Grantees: Exit Certification (Once per scholar/grant)	106 grantees (19 completers/year)	4.75	503.5	\$25,175 <sup>1</sup>
Scholars: Scholar Training and Employment Record (Annual)	3,600 scholars	0.25	900	\$16,758 <sup>2</sup>
Scholars: Payback Agreement (Once per grant)	2,014 scholars	0.5	1,007	\$18,750.34 <sup>2</sup>
Scholars: Exit Certification (Once per grant)	2,014 scholars	0.25	503.5	\$9,375.17 <sup>2</sup>
Employers:	3,600 employers	0.17	612	\$30,600 <sup>1</sup>

Employment Verification Record (Annual)				
<b>Totals</b>	<b>11,790</b>	<b>10.42</b>	<b>4,857</b>	<b>\$167,208.51</b>

<sup>1</sup> Based on an estimated hourly rate of \$50 for grantee administrators and employers.

<sup>2</sup> Based on an estimated average hourly rate of \$18.62 for scholars.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.

Total Annualized Capital/Startup Cost	:\$0
Total Annual Costs (O&M)	:\$0_____
Total Annualized Costs Requested	:\$0

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in A-1, including capital or start-up costs, operation, maintenance, or purchase of services. It is assumed that all respondents have access to a computer either through the grantee (the institution of higher education) or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondents reliable access to support services. This Help Desk could assist a respondent without reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

**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 total annual cost to the Federal government reflects the combined costs for RSA to contract for the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

Type of Cost	Cost
RSA Staff (salaries)	\$29,811
Contractor Data and Reporting Services (Fixed price)	\$352,883
Total	\$382,694

RSA has secured a fixed price contract with AnLar and Westat to create and manage the online data collection system. The fixed cost for this contract is \$352,883 for option year four (July 2021 – June 2022). These costs include the development and maintenance of the system, support for respondents, and preparation of reports. The majority of communications with respondents are electronic; however, scholars who do not respond to electronic or telephone communications are sent follow-up letters. The costs for those mailings are included in the contract.

The RSA program office maintains a program specialist whose function is to spend 25 percent of the time managing the contract and 12 tasks. This program position is a GS-13, which, in 2021, ranges from \$103,690 to \$134,798 in annual salary.

**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.**

	<b>Program Change Due to New Statute</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>
<b>Total Burden</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>Total Responses</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>Total Costs (if applicable)</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

This request is for an extension to an approved data collection. As there are no changes as part of this extension, we will continue to collect data from grantees, scholars and employers maintaining the same burden estimate of 4,857 total hours for 1820-0617.

**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 will continue to use this information in preparing its Annual Report to Congress on the activities carried out under the Rehabilitation Act. The data will also be used on an annual basis to report results to the Department's Budget Service for compliance with GPRC and publication in the Congressional Justification for the Department's budget. A final report will be produced for each fiscal year, including descriptive analyses of all variables collected. The number of scholars and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. The report will also provide data to monitor the fulfillment of scholar service obligation and grantee and scholar compliance with the program regulations. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets. All data will be in an aggregate form to protect PII and no PII information will be published.

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

This item is not applicable as the OMB expiration date will be displayed for each respondent type the first time they login or enter the system.

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

There are no exceptions to the certification statement.