

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 form expires on July 31, 2023, and RSA is requesting a three-year extension until July 31, 2026.

Form 692 collects information from formula grants authorized under the Rehabilitation Act of 1973 (Rehabilitation Act) with respect to the amount of grant funds they will not be able to use and, thus, wish to relinquish to other grantees. The form also gives grantees the opportunity to request additional funds, should excess funds be available, during the reallocation process. To maximize the use of funds appropriated for formula grant programs, the Rehabilitation Act authorizes the Rehabilitation Services Administration (RSA) to reallocate to other grant recipients that portion of a recipient's annual grant that cannot be used. Specifically, the Rehabilitation Act authorizes RSA to reallocate funds for these formula grant programs: State Vocational Rehabilitation Services (VR) pursuant to section 110(b)(2), State Supported Employment Services (Supported Employment) pursuant to section 603(b), Independent Living Services for Older Individuals Who Are Blind (OIB) pursuant to section 752(i)(4), Client Assistance Program (CAP) pursuant to section 112(e), and Protection and Advocacy of Individual Rights (PAIR) pursuant to section 509(e).

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

The information will be used by the RSA State Monitoring and Program Improvement Division (SMPID) to reallocate formula grant funds for the awards mentioned above, to the extent funds are available for reallocation. For each grant award, the grantee enters the amount of funds, if any, to be relinquished and/or any additional funds the grantee would like to request.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. 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 collection of information will be completed using the RSA Management Information System (RSAMIS). RSA grantees currently enter required State Plan and Federal Financial Report data (e.g., RSA-17) into the RSAMIS. Each grantee has a secure ID and password which is required to logon to the RSAMIS. This information collection uses the same login credentials to ensure uniformity with currently approved data collections.

Submission of reallocation information through the RSAMIS reduces the need for RSA SMPID staff to enter data into a separate spreadsheet for tracking and calculating the revised grant award amounts; thereby, reducing the chance of data entry errors.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There are no other forms or processes that collect the data elements necessary to process reallocation requests for RSA formula grant award programs in accordance with the Rehabilitation Act. Requiring the reallocation data to be entered through the RSAMIS effectively uses existing RSAMIS data (e.g., grantee name, grant award number, etc.) to reduce the amount of information grantees must provide.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

Because the grantees participating in reallocation currently submit OMB approved information collection data using the RSAMIS, there should be no additional impact.

- 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

RSA must collect the information contained on Form 692 annually in order to satisfy the requirements of section 110(b)(1) of the Rehabilitation Act for purposes of the VR program, which requires RSA to determine not later than 45 days prior to the end of the fiscal year which States will not be able to use all of their VR grants. On the same form, RSA collects information from States as to whether they want to request additional VR funds and, if so, how much, thereby using the form to satisfy the requirement of section

110(b)(2) of the Rehabilitation Act, which requires RSA to reallocate available VR grant funds prior to the end of the fiscal year. In addition, the form enables RSA to satisfy Rehabilitation Act requirements for the Supported Employment (section 603(b),) OIB (section 752(i)(4)), CAP (section 112(e)), and PAIR (section 509(e)) programs, which require RSA to reallocate available grant funds to other grantees prior to the end of the fiscal year.

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

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**

This information is collected on an annual basis.

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

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

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

Copies are not required due to electronic submission.

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

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

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

The information collected is not connected to a statistical survey.

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

The information collected does not require statistical analysis or classification.

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

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

- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. For the 30 day notice, indicate that a notice will be published.**

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.

This request is for an extension of the existing approved form (1820-0692), with only one technical revision to the signature and certification line. A 60-day Federal Register Notice (FRN) published on March 31, 2023 (88 FR 19286). One non-substantive comment was received. A 30-day FRN will be published to solicit additional public comments.

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.

SMPID requested comments from five grantees that use the existing form and received no suggestions or recommendations for revisions. RSA will publish the form in the Federal Register for 60- and 30-day 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 payment or gift was or will be provided to any respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.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.

No assurances of confidentiality are being made to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

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)

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.**

The original data related to the hour burden of the collection was obtained from six respondents who are active grantees and State Vocational Rehabilitation Services program Finance Directors. This burden is related to the time required to report the data in the RSAMIS. The respondents estimated it would take less than 2 minutes per award to enter the data online. The primary information necessary for the grantee to determine whether to relinquish and/or request funds is tracked using quarterly financial report data (e.g., RSA-17) submissions. Therefore, the grantees do not need to complete additional analyses or calculations prior to completing the RSA-692.

Respondents include both State Vocational Rehabilitation agencies and private nonprofit grantees. Since only the grantees seeking to relinquish or request additional funds complete the form, the number of forms submitted by grantees on an annual basis can vary considerably. Therefore, the annual burden is an overestimate of the actual burden because not every grantee will submit a form. The maximum number of potential responses given one response per grantee per grant award is 323.

Program Name	# of Awards
State Vocational Rehabilitation Services (Title 1, 34 C.F.R. part 361)	78
Client Assistance Program (Title I, 34 C.F.R. part 370)	57
Independent Living Services for Older Individuals Who Are Blind – State Grants (Title VII, 34 C.F.R. part 367)	56
State Supported Employment Services (Title VI-B, 34 C.F.R. part 363)	75
Protection and Advocacy of Individual Rights (Title V, 34 C.F.R. part 381)	57
Total	0

The estimated respondent average hourly wage is based on the loaded wage rate.

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

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)
RSA-692	N/A	N/A	323	1	.033	11	\$50.00	\$549.00
Annualized Totals	N/A	N/A	323	1	.033	11	\$50.00	\$549.00

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 :

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

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

The data is being collected through the RSAMIS, an existing system, and therefore there are no additional costs because the form is substantially unchanged. Data support for the RSAMIS is provided by RSA staff. The electronic equipment necessary to support the RSAMIS is already in place; therefore, there is no additional cost for

equipment. The cost estimate is based upon the Federal cost from renewing and implementing the RSA-692 form for the past three renewals.

- 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			
Total Responses			
Total Costs (if applicable)			

There are no program changes or adjustments.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

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

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

The Department of Education is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

There are no exceptions to the certification statement.