

## **SUPPORTING STATEMENT (PART A) FOR PAPERWORK REDUCTION ACT SUBMISSION**

### **A. Justification**

The U.S. Department of Education's Rehabilitation Services Administration (RSA) requests clearance for new data collection activities to support the evaluation of the 84.421E Federal fiscal year (FFY) 2023 Disability Innovation Fund (DIF), Pathways to Partnerships Innovative Model Demonstration Project. The purpose of the DIF, as provided by the Consolidated Appropriations Act, 2022 (Pub. L. 117-103), is to support innovative activities aimed at increasing competitive integrated employment as defined in section 7 of the Rehabilitation Act of 1973 (Rehabilitation Act) (29 U.S.C. 705(5)) for children, youth, and other individuals with disabilities. The program aims to create systematic and seamless approaches to offering transition services to children with disabilities, ages 10 to 13 and youth with disabilities ages 14 to 24 through collaborations among State vocational rehabilitation (VR) agencies, State education agencies (SEAs), local education agencies (LEAs), Federally funded Centers for Independent Living (CILs), and other organizations offering services to this population. RSA is investing a total of \$198,975,322 in grant funding to the 20 States through the FFY 2023 DIF program.

This request covers primary data collection activities for the National Evaluation of the Pathways to Partnerships Program. These activities include the following:

- Surveys and interviews with program participants or their parent or guardian
- Surveys with State VR, SEA, and CIL directors
- Surveys and interviews with project and partner staff
- Collecting project administrative data (staff rosters, cost worksheets, and web analytics) from project directors

#### **A.1 Circumstances Necessitating the Collection of Information**

**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.**

In September 2023, RSA awarded five-year cooperative agreements for the 84.421E FFY 2023 DIF model demonstration projects. The awards provide 20 State VR agencies or SEAs with funding to implement Pathways to Partnerships model demonstration projects. The Pathways to Partnerships models vary across the 20 projects, but the projects' purpose is to create and implement systematic approaches to delivering transition services to children and youth with disabilities. The approaches must entail establishing close partnerships across key agencies to deliver these services in ways likely to improve the education and employment outcomes of children and youth with disabilities.

To achieve this overarching purpose, the projects will create innovative service and partnership models that involve the following:

- Developing partnerships among State VR agencies, SEAs, LEAs, CILs, and potentially other entities to deliver innovative transition services;
- Mapping resources to identify and analyze existing programs, services, and resources available to children and youth with disabilities, their families, and providers;
- Creating a website that serves as a central location for maintaining transition-related information and materials for children and youth with disabilities, their families, youth service professionals, and others;
- Developing and delivering training to youth service professionals that improves their ability to collaborate across agencies and deliver transition services
- Training children and youth with disabilities on financial literacy, independent living, and soft skills
- Offering career and job-related training, internship, and exploration opportunities to children and youth with disabilities as well as resources to explore and promote postsecondary education

Collecting data for the National Evaluation of the Pathways to Partnership Program is critical to generating actionable information for practitioners and policymakers and ensuring that successful models and lessons learned are documented so that they may be replicated by SEA, LEA, VR, and CIL agencies and their partners nationwide. The national evaluation will (1) describe the projects' components, strategies, implementation, and costs; (2) review the projects' websites and assess their reach; (3) assess the alignment of partnerships in the transition process; (4) examine the training offered to youth service professionals; (5) analyze the services offered to child and youth participants; and (6) analyze trends in outcomes and potential impacts of the projects.

## **A.2 Purpose and Use of the Information Collection**

**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 National Evaluation of the Pathways to Partnerships Program will use the information collected to answer research questions related to project implementation, participation of children and youth with disabilities and their parents or guardians, participation of youth service professionals, outcomes and impacts, costs, and system change (Exhibit A.1).

**Exhibit A.1. National Evaluation of the Pathways to Partnerships Program research questions**

<b>Topic area or question</b>
<b>1. Implementation</b>
1.1. What are the primary innovation models that projects implemented?
1.2. Who are the key project partners, what are their roles, and in what ways are they collaborating?
1.3. What new services or resources are the projects offering to children, youth, and parents as part of the innovation models?
1.4. What new training or resources are the projects offering to youth service professionals who interact with children, youth, and parents?
1.5. What are the most significant facilitators and challenges the projects experienced when developing and implementing the new partnerships and services?
<b>2. Participation</b>
2.1. What has been the projects' experience with uptake of the new services and resources for children, youth, and parents?
2.2. What facilitators and challenges have the projects experienced when connecting with families and helping them use the projects' services and resources? How have the projects addressed the challenges?
2.3. What has been the projects' experience with uptake of the new training and resources for youth service professionals?
2.4. What facilitators and challenges have the projects experienced when connecting youth service professionals with trainings and other project resources? How have the projects addressed the challenges?
<b>3. Outcomes and impacts</b>
3.1. What impacts have the projects had on support staff and agency partnerships?
3.2. How have the projects changed youth service professionals' knowledge and skills as they interact with youth and parents?
3.3. To what extent do youth and parents know where to go to receive education and employment services and resources in their communities?
3.4. To what extent have children and youth used key education and employment services and resources in their communities?
3.5. To what extent do children and youth have unmet education or employment service needs? How has this changed over time?
3.6. Have the education and employment outcomes of youth with disabilities improved over the course of the project? Have they improved relative to comparable youth in other states or in non-pilot parts of the grantee states?
<b>4. Costs</b>
4.1. How were funds allocated across specific activities during Year 3 (a steady state year after project implementation and before close-out)?
4.2. What was the average cost of providing services, resources, and training to participants?
<b>5. Systems change</b>
5.1. To what extent have the projects achieved a seamless transition system for children and youth with disabilities?
5.2. Are the partnerships developed under the project likely to persist after the grant period?
5.3. After the grant ends, are projects likely to sustain any of the new services or resources they developed?
5.4. What lessons or advice would the projects offer to other states or local areas that want to achieve a seamless transition system for children and youth with disabilities?

The evaluation will rely on multiple data sources to answer the research questions. First, the study team will collect **qualitative data** from on-site observations conducted during site visits as well as interviews with project participants, their parents or guardians (Appendix A), project leaders, and staff from partner organizations (Appendix B). Second, the team will conduct **three surveys**: (1) a child and youth participant survey (Appendix C with associated consent form), (2) a State VR, SEA, and CIL director survey in all 50 States (Appendix D), and (3) a project and partner staff survey in the 20 project States (Appendix D). Third, the team will collect **administrative data** to support and complement the other data collection efforts, including staff rosters (Appendix E), project cost data (Appendix F), and project website analytics data (Appendix G). Exhibit A.2 describes the timing and components of each data collection activity.

#### Exhibit A.2. Data collection activities and timeline

<b>Data</b>	<b>Data type (primary or administrative)</b>	<b>Respondent or source</b>	<b>Mode of data collection</b>	<b>Use in study</b>	<b>Timing</b>
<b>Qualitative data</b>					
On-site observations	Primary	20 projects	In-person and virtual data collection	Gather information about project processes and implementation by observing planned activities such as staff training, participant recruitment, or partner meetings	Project Years 2 and 4
Interviews with project and partner staff	Primary	Project and partner organization staff	In-person and virtual data collection	Inform assessments of project implementation, partnerships, staff-focused interventions, participant outcomes, and sustainability of innovations	Project Years 2 and 4
Interviews with child and youth participants with disabilities or their parents	Primary	Youth with disabilities age 18 or older or parents of children and youth with disabilities under age 18 enrolled in 20 projects	Virtual data collection	Inform assessments of project implementation and outcomes by eliciting perspectives from participants and their parents	Project Year 4
<b>Survey data</b>					
Survey of State VR, SEA, and CIL directors	Primary	VR, SEA, and CIL directors from 50 States and the District of Columbia	Electronic (web)	Understand the context of transition services and organizational partnerships nationwide and how they evolve over time; provide key points of comparison between grantee and non-grantee States	Project Years 2 and 4
Survey of project	Primary	Project and partner staff	Electronic (web)	Assess cross-agency partnerships and	Project Years 2

<b>Data</b>	<b>Data type (primary or administrative)</b>	<b>Respondent or source</b>	<b>Mode of data collection</b>	<b>Use in study</b>	<b>Timing</b>
and partner staff		from 20 projects		collaboration efforts and how they evolve over time	and 4
Survey of child and youth participants with disabilities or their parents	Primary	Youth with disabilities age 18 or older or parents of children and youth with disabilities under age 18 enrolled in 20 projects	Electronic (web)	Gather baseline characteristics of child and youth participants with disabilities and assess knowledge of key resources, challenges, and unmet transition service needs; obtain contact information for participants who opt into study interviews	At project enrollment during Project Years 2 to 4
<b>Administrative data</b>					
Project staff rosters	Administrative	Directors of 20 projects	Electronic (spreadsheet)	Gather contact information for the purpose of distributing the staff survey, conducting site visits, and understanding project staffing	Project Years 2 and 4
Cost data	Administrative	Directors of 20 projects	Electronic (document form)	Gather information on project costs to help calculate the average cost of providing services, resources, and training to participants and understand start-up and ongoing components of costs	Project Year 3
Website analytics data	Administrative	Directors of 20 projects	Electronic (document form)	Gather information on website analytics to understand the extent to which people used the websites	Quarterly in Project Years 2 to 4

Note: The national evaluation project years, beginning in 2023 and ending in 2028, are from September 1 to August 31.

CIL = Center for Independent Living; SEA = State education agency; VR = vocational rehabilitation.

### **A.3 Use of Information Technology and Burden Reduction**

**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 data collection plan is designed to obtain information in an efficient way that minimizes the

burden on respondents, including the use of appropriate technology. The study team will use Voxco survey software to design and administer surveys. Voxco Online's standard question types have been tested and are compliant with section 508 of Web Content Accessibility Guidelines 2.0. The self-administered surveys will be online and can be completed on multiple devices at the respondent's convenience, including a smart phone, tablet, and desktop PC. Voxco optimizes the user experience, so respondents do not have to resize their screens for maximum visibility. The survey software detects the type of device being used, and elements are reorganized and reformatted to provide an intuitive experience tailored to the device. The software supports ease of use and accessibility by adhering to the Web Content Accessibility Guidelines principles of being perceivable, operable, understandable, and robust; the system works with screen readers making it accessible to those with vision impairments. The evaluator will design the surveys with a high degree of visual appeal and intuitive flow, which will necessitate few text instructions. Respondents will have the option to save their progress and continue later in time. In addition, the surveys will use drop-down response categories or radio button choice lists whenever appropriate so respondents can quickly select from a list. The survey will use dynamic questions, automated skip patterns, and choice restriction logic so respondents see only the questions that apply to them (including those based on answers provided previously in the survey), and their answers are restricted to only those intended by the question.

#### **A.4 Efforts to Identify Duplication**

**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.**

This evaluation will not collect information that is already available from alternative data sources. Information to be obtained from the qualitative and survey data collections is not available elsewhere. The study team will design all data collection efforts to gather essential data and minimize burden on projects and participants.

#### **A.5 Efforts to Minimize Burden in Small Businesses**

**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.**

This study will not involve small businesses.

## **A.6 Consequences of Not Collecting the Information**

**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 lack of interagency coordination in delivering transition services to children and youth with disabilities perpetuates uncoordinated service delivery, duplicate services, confusion and complexity for parents trying to navigate the system, and poor post-school outcomes for children and youth with disabilities. The Pathways to Partnerships projects seek to address these shortcomings through interagency partnerships. The information collection is necessary for RSA to understand (1) how the Pathways to Partnerships projects were implemented; (2) how interagency collaboration evolved in the project States relative to non-project States; and (3) the outcomes of the projects and lessons learned. The data collection will allow RSA to develop and disseminate information to help youth service professionals create collaborative and seamless approaches to offering transition services to children and youth with disabilities. If the proposed data collection is not conducted, RSA will lack comprehensive and uniform information about how the 20 model demonstration projects were implemented and their potential impacts on interagency partnerships, service delivery, and the outcomes of children and youth with disabilities. It will also lack information on how to develop and sustain successful interagency partnerships and innovative services that can be shared with States nationwide.

## **A.7 Special Circumstances Justifying Inconsistencies with Guidelines in 5CFR 1320.6**

**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.**

In March 2024, the Office of Management and Budget (OMB) announced revisions to Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15) and published the revised SPD15 standard in the Federal Register (89 FR 22182). As the program being evaluated was established prior to the March 2024 release of the revisions, the present ICR contains no changes to the race and ethnicity items, established based on the 1997 SPD 15 standard.

The Department is currently working on an action plan for compliance with the newly revised SPD15 standards, which will fully take effect on March 28, 2029. Early discussions suggest that implementation of these standards will be particularly complex and delicate in data collections where race and ethnicity data is reported, to the Department, both by individuals about themselves and also provided by third parties providing aggregate data on the individuals they serve and represent (for example, state and local education agencies, institutions of higher education).

#### **A.8 Federal Register and Consultation Outside the Agency**

**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.**

A 60-day notice to solicit public comments was published in the *Federal Register*, Volume 89, No. 209, page 85962, on October 29, 2024.

No comments were received in response to the 60-day notice.

A 30-day notice will be published to solicit additional public comments.

### A.8.2 Consultations outside the agency

In formulating this evaluation design, the study team sought input from a technical working group on March 8, 2024. The input helps ensure the study is of the highest quality and that findings are useful to Federal policymakers. Exhibit A.3 lists the people who served on the technical working group, their affiliations, and their relevant expertise.

**Exhibit A.3.** Technical working group members, their affiliation, and relevant expertise

Member category	Name	Affiliation	Areas of expertise
Person with lived experience	Spencer Adams Bristol	None (youth with a disability)	Lived experience receiving services from State VR agency and transitioning from high school to employment and postsecondary education
Researcher and person with lived experience	Nanette Goodman	Syracuse University	Research and evaluation, youth transition, parent of a youth with disability
Researcher	Judith Gross	Indiana University	Research and evaluation, VR, education, CILs, youth transition
Federal government agency leader and researcher	Jeffrey Hemmeter	Social Security Administration	Child Supplemental Security Income program, research on youth with disabilities and Federal agency transition efforts
Researcher	Kara Hirano	Search Institute	Research and evaluation, education, youth transition
VR and State program expert	Andrew Karhan	San Diego State University	Research and evaluation, VR, youth transition
DIF project representative	George Michna	Connecticut Department of Aging and Disability Services	DIF project implementation, VR and community living services, special education
DIF project representative, educator, and researcher	Anthony Plotner	University of South Carolina	Research and evaluation, special education, CILs, youth transition, DIF project evaluation
Researcher	Jeffrey Smith	University of Wisconsin	Research and evaluation methods, job training programs
DIF project representative, educator, and researcher	Brent Williams	University of Arkansas	VR, special education, CILs, youth transition, DIF project implementation
DIF project representative and researcher	Michelle Yin	Northwestern University	Research and evaluation, VR, youth transition, DIF project implementation, DIF project evaluation

CIL = Center for Independent Living; DIF = Disability Innovation Fund; VR = vocational rehabilitation.

### A.8.3 Unresolved issues

There are no unresolved issues.

## **A.9 Payments or Gifts to Respondents**

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

To encourage survey participation and to acknowledge respondent burden, eligible CIL staff who complete the staff or director surveys will receive a \$30 gift card. Youth, parents, or guardians who participate in interviews will also receive a \$30 gift card in appreciation of their time.

All incentives will be delivered using Tango Cards. Tango Cards allow respondents to select the vendor gift card of their choice. The study team will create a personalized, project-specific email template that includes a thank you message, instructions, and a link for redeeming the e-gift card, a Tango help desk phone number, and email address and phone number for respondents that need help or have not received their gift cards in a timely manner. After choosing how they will redeem the e-gift card, the respondent will receive a second email from the chosen vendor (or vendors). This email contains the actual gift card, which might include a PIN, a printable bar-coded gift card image, or both. For respondents that lose or cannot access the gift card redemption links, the team can retrieve and forward links.

## **A.10 Assurances of Confidentiality**

**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. 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.**

### **A.10.1 Personally identifiable information**

The information the project director will provide during data collection activities to support survey and site visits efforts will contain personally identifiable information (PII). This PII includes names and contact information of project staff and participants. This contact information is necessary to distribute surveys, conduct interviews, and provide incentive payments.

### **A.10.2 Assurances of privacy**

The research team will protect the confidentiality of all data collected for the study and will use it for research purposes only. All data collection instruments contain a privacy statement as well.

The study team will program surveys into Voxco software, a comprehensive multimodal survey platform. All survey outreach will stress the importance of the potential respondent's

participation and the confidentiality of their response. Voxco survey software has robust systems in place to manage the security of PII. Certain data points are automatically designated PII by the system (for example, phone numbers and email addresses), and any user-created variable can be manually flagged as PII. Access to data flagged as PII is restricted to users explicitly granted such access. The system keeps logs of each time a user attempts to view, edit, print, or export PII regardless of whether the user has been granted access. Data flagged as PII will not be exported with the rest of the data if a user without access runs an export of the data. The web survey data will be stored in the Federal Risk and Authorization Management Program–authorized platform and transferred via a secure transfer site to Mathematica’s secure restricted folders for analysis. All electronic data will be stored in secure restricted folders, to which only approved project team members have access. All respondent materials, including contact emails, letters, and the data collection instruments, contain a notice of confidentiality.

All members of the study team with data access will be trained and certified on the importance of confidentiality and data security. The study team routinely use the following safeguards to maintain data confidentiality and will apply them consistently throughout this study:

- All employees must sign a confidentiality pledge that emphasizes the importance of confidentiality and describes employees’ obligations to maintain it.
- PII is maintained on separate forms and files, which are linked only by random, study-specific identification numbers.
- Access to hard-copy documents is strictly limited. Documents are stored in locked files and cabinets. Discarded materials are shredded.
- Access to computer data files is protected by secure usernames and passwords, which are only available to specific users who have a need to access the data and who have the appropriate U.S. Department of Education security clearances.
- Sensitive data are encrypted and stored on removable storage devices that are kept physically secure when not in use.

The study team’s standard for maintaining confidentiality includes training staff on the meaning of confidentiality, particularly as it relates to handling requests for information, and assuring respondents of the protection of their responses. It also includes built-in safeguards on status monitoring and receipt control systems. In addition, all study staff who have access to confidential data must obtain security clearance from the U.S. Department of Education, which requires completing personnel security forms, providing fingerprints, and undergoing a background check.

During data analysis, all names are replaced with identification numbers. All study reports will present data in aggregate form only; no survey or interview participants will be identifiable with the data they provided. Any quotations used in public reporting will be edited to ensure the identity of the respondent cannot be ascertained.

#### **A.11 Questions of a Sensitive Nature**

**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.**

The child and youth participant survey includes a question about the child's or youth's type of disability, which might be considered sensitive information by some respondents. Knowing the nature of the disabilities experienced by children and youth who participate in the project is important to assessing the extent to which the projects are reaching underserved communities defined by disability type and those with the most significant disabilities. Research suggests that people with physical disabilities are more likely to receive VR services than those with mental health disabilities in some States, and CILs often focus their services on people with physical disabilities. School staff might be better equipped to support youth with certain types of disabilities than others. Understanding the types of disabilities of child and youth participants will enable the evaluation to assess whether there are disparities in access to project services stemming from the project recruitment methods or usual service delivery processes. The child and youth disability question is based on a question used in the National Longitudinal Transition Study-2 conducted by the Institute of Education Sciences. Respondents who do not wish to provide the information may skip the question.

The child and youth participant survey also includes a question about the child's or youth's gender, which might be considered sensitive information by some respondents. The gender of the child/youth is a basic demographic trait important to assessing the characteristics of project participants. The information will be used in the participation analysis to characterize the populations served by the Pathways to Partnerships projects. No subgroup analyses based on gender will be conducted. Respondents who do not wish to provide the information may skip the question.

The project and partner staff survey also includes questions about whether the respondent identifies as someone with a disability and gender. This information, along with other information collected, will enable the evaluation to characterize service providers. Features of equitable and culturally-responsive service delivery practices include service providers reflecting the diversity of characteristics of the populations they serve. All youth service professionals participating in the projects will serve children and youth with disabilities, so their disability status is an important characteristic to consider in the evaluation. Four of the Pathways to Partnerships projects plan to engage youth from communities of lesbian, gay, bisexual, transgender, and other gender identity youth as underserved communities that will be a focus of their project activities. Respondents who do not wish to provide the information may skip these questions.

## **A.12 Estimate of Response Burden**

**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 total burden for these data collection activities is **14,021** hours. The total annual respondent burden for the data collection effort covered by this clearance request is **4,674** hours (total burden of **14,021** divided by the three study years included in this submission). The number of annual responses is **17,137** (total of 51,412 responses divided by the three years of the study included in this submission).

Exhibit A.4 provides an estimate of burden for the data collection activities included in the current request, broken down by instrument and respondent. In addition, the exhibit presents estimates of indirect costs to all respondents for each data collection instrument. These estimates are based on our prior experience collecting data from participants, grant directors, and State offices, along with actual time recorded while pretesting each instrument.

**Exhibit A.4.** Estimate of respondent time and cost burden by year for the National Evaluation of the Pathways to Partnership Program data collection activities

Instrument	Number of respondents (total over request period)	Number of responses per respondent (total over request period)	Average burden per response (hours)	Total burden (hours)	Annual burden (hours)	Average hourly wage	Total annual cost
<b>Qualitative data collection</b>							
Participant interviews	100	1	0.5	50	16.67	\$7.25 <sup>a</sup>	\$120.83
Parent and guardian interviews	100	1	0.5	50	16.67	\$29.76 <sup>b</sup>	\$496.00
Project and partner staff interviews	200	2	1	400	133.33	\$32.88 <sup>c</sup>	\$4,384.00
<b>Survey data collection</b>							
Parent/guardian and youth participant survey	48,000	1	0.25	12,000	4,000	\$29.76 <sup>b</sup>	\$119,040.00
State VR, SEA, and CIL director survey	456	2	0.33	300.96	100.32	\$32.88 <sup>c</sup>	\$3,298.52
Project and partner staff survey	800	2	0.5	800	266.67	\$32.88 <sup>c</sup>	\$8,768.00
<b>Administrative data collection</b>							
Project staff rosters	20	2	3	120	40	\$32.88 <sup>c</sup>	\$1,315.20
Cost workbook	20	1	3	60	20	\$32.88 <sup>c</sup>	\$657.60
Website analytics data	20	12	1	240	80	\$32.88 <sup>c</sup>	\$2,630.40
<b>Total<sup>d</sup></b>				<b>14,021<sup>e</sup></b>	<b>4,674</b>		<b>\$140,711</b>

<sup>a</sup> The Federal minimum wage rate is from <https://dol.gov/general/topic/wages/minimumwage>, and State minimum wage rates are from <https://www.dol.gov/agencies/whd/minimum-wage/state>.

<sup>b</sup> The median hourly wage rate for All Occupations (00-0000) is from [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

<sup>c</sup> The mean hourly wage rate for Management Occupations (11-000) is from Social and Community Service Managers (bls.gov) at [https://www.bls.gov/oes/current/naics4\\_624300.htm#11-0000](https://www.bls.gov/oes/current/naics4_624300.htm#11-0000).

<sup>d</sup> Values rounded to the nearest whole number.

<sup>e</sup> Annual burden is calculated by dividing the total burden hours by three years.

CIL = Center for Independent Living; SEA = State education agency; VR = vocational rehabilitation.

**A.13 Estimate of Total Capital and Startup Costs/Operation and Maintenance Costs to Respondents or Record-Keepers**

**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.)**

There are no direct or start-up costs to respondents associated with the proposed primary data collection.

#### **A.14 Estimates of Costs to the Federal Government**

**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 cost to the Federal government for this study is \$19,910,446. This cost includes the costs incurred for designing and administrating all collection instruments, processing and analyzing the data, and preparing reports. The average annual cost over the five years of the study is \$3,982,089.

#### **A.15 Reasons for program changes or adjustments**

**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).**

This is a request for a new collection of information.

#### **A.16 Plans for Analysis, Publication, and Schedule**

**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.**

##### **A.16.1 Analysis plans**

The National Evaluation of the Pathways to Partnerships Program will conduct five types of analyses: implementation, participation, outcomes and impacts, cost, and systems change.

**Implementation analysis.** The implementation analysis will document the experiences of the projects in designing and implementing their innovations, forming partnerships, establishing partner roles, and interacting with partners in their delivery of transition services and resources to children, youth, families, and youth service professionals. Because the projects will build on and operate in an existing transition system, a focus of the implementation analysis will be to understand how the project innovations differ from the status quo and the specific issues or limitations in the existing system they are trying to address. The analysis will seek to distinguish

the activities that have been accomplished with project funding from those that would have occurred in the absence of the projects. It will also consider how local and State contexts and other factors affected implementation.

**Participation analysis.** Understanding the service providers and the children and youth with disabilities who take part in the projects' innovations will help RSA understand whether the projects delivered their interventions to the intended communities and provide context for the national evaluation findings. The study team will conduct the participation analyses for two distinct groups: the service providers who collaborate with or receive professional development through the projects and the children and youth with disabilities who use the project service innovations. For children and youth with disabilities, the analysis will assess participants' characteristics to understand who is being served, their knowledge of resources and transition challenges, and whether projects are reaching children and youth with disabilities from underserved communities. For service providers, the analysis will describe types of partnerships and their roles in the projects as well as the professional development offered and received.

**Outcomes and impacts.** The outcomes analysis will describe participant, provider, and system outcomes potentially affected by the projects. The projects intend to affect a wide range of outcomes, including quantity and quality of service delivery; experiences of service providers, children and youth with disabilities, and parents; services used by children and youth; and children's and youth's education and employment. The national evaluation will document the potential effects of the projects using the best feasible research design and methods.

**Costs analysis.** The cost analysis will descriptively assess project costs to understand the relative intensity of the efforts of the projects and their partner organizations as well as document the expenditures required to implement the innovations. The findings will help RSA understand the infrastructure needed to support the projects, which can aid in replicating or expanding the innovations. The analysis will also provide context for the outcomes observed within and across projects.

**Systems change analysis.** The system change analysis will assess whether the Pathways to Partnerships innovations have resulted in any systems changes and whether specific project components are likely to be sustained after the grant period.

#### **A.16.2 Time schedule and publication plans**

Reporting plans include an evaluation report, study brief, study snapshot, and how-to guide (Exhibit A.5).

- The evaluation report will present a complete set of findings from the National Evaluation of the Pathways to Partnership Program and will lead to a related set of 508-compliant dissemination materials to reach a diverse range of audiences.
- The study brief will be a condensed description of evaluation findings that uses tables and infographics to convey complex information to people who are not familiar with detailed evaluation methods, such as program staff, employers, and people with disabilities and their families.
- The study snapshot will provide a high-level overview of the main evaluation findings and takeaways using a headline approach with supporting graphics, figures, or bullets. The

target audience for this deliverable is people who are not familiar with detailed evaluation methods, such as program staff, employers, and people with disabilities and their families.

- The how-to guide will present the effective strategies that DIF programs used to promote use of transition services by children and youth with disabilities and describe how to implement them, with considerations for costs, facilitators, and challenges. The target audience for this guide includes professionals and practitioners interested in replicating DIF program strategies.

**Exhibit A.5.** Deliverable schedule for evaluation-related reports

Deliverable	Completion date
Evaluation report	July 28, 2028
Internal study brief	August 15, 2028
Study snapshot	August 31, 2028
How-to guide	August 31, 2028

**A.17 Approval to Not Display Expiration Date**

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

RSA is not requesting a waiver for the display of the OMB approval number and expiration date. The instruments will display the OMB expiration date.

**A.18 Exceptions to the Certification Statement**

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

No exceptions to the certification statement are requested or required.