

**COMMITTEE FOR PURCHASE FROM PEOPLE WHO ARE BLIND OR SEVERELY
DISABLED**

TITLE OF ICR:
Participating Employee Information

Justification – Part A Supporting Statement

1. Overview of Information Collection: Provide a brief overview of the information being collected, disclosed, or the recordkeeping requirement imposed by the agency.

The Commission is responsible for implementing the Javits-Wagner-O'Day (JWOD) Act, [41 U.S.C. 8501-8506](#). In doing so, the Commission oversees the AbilityOne Program, an employment program in which individuals who are blind or have significant disabilities provide products and services to Federal agencies, thereby creating employment opportunities for such individuals. The Commission maintains a Procurement List of mandatory source products and services provided by approximately 413 qualified nonprofit agencies (NPAs). This Participating Employee Information form will collect data from qualified NPAs regarding Participating Employees in order to ensure the integrity and further the mission of the AbilityOne Program. This form will provide data on matters such as employee wages, the nature of Participating Employees' disabilities, what job supports and accommodations the Participating Employees are receiving, and a description of employee career development activities that are available to Participating Employees, if an NPA is currently providing such activities.

- Identify whether this is a request for approval of a New Collection, a Revision to an Existing Collection, an Extension, or a Reinstatement.
 - This ICR is a new collection.
- If this request is related to a previously approved collection, please summarize any existing changes to instruments (e.g., forms, questions, instructions), method of collection, burden estimates, or other material changes of importance that have occurred since the last approval/request and provide a redline mark up or a table to show the questions and/or other information that the agency has changed.
 - Not applicable, based on the answer above.
- Need & Method for the Information Collection. Explain the circumstances that make the collection of information necessary. The information is needed to ensure the integrity of the program and to identify career opportunities within the program. The method for collecting the information will include conversations with the participating employee and reviewing and compiling data in the possession of the reporting entity.
- Identify any legal or administrative requirements that necessitate the collection.

- o The Javits-Wagner-O'Day Act, specifically 41 U.S.C. 8501 and 8503;
 - o Regulations such as 41 CFR. 51-4.3 which justify the collection of data;
 - o Compliance policies issued by the U.S. AbilityOne Commission
- Provide the citation and a copy of the appropriate section of each statute / regulation mandating or authorizing the collection of information as a supplementary document.
 - o See above for citations. Copies of all cited authorities included as attachments.
- Explain what the statute/regulation requires. Is there a deadline? If so, explain how you will meet the deadline.
 - o The JWOD Act requires that qualified nonprofit agencies (NPAs) participating in the AbilityOne Program employ people who are blind or have significant disabilities, and that those individuals perform seventy-five percent of all direct labor hours performed by the NPA. Individuals who are blind or significantly disabled and work on AbilityOne contracts are designated as “participating employees” under Commission Policy 51.403. Commission regulation 41 CFR 51-4.3(c)(2) requires annual reports that evaluate the work potential, interests, aptitudes, and abilities of persons with disabilities be updated annually and maintained on file for each individual considered a “participating employee” as defined above. Commission regulation 41 CFR 4.3(b)(8) also requires NPAs to maintain a job placement program operated by or for the NPA that coordinates with appropriate organizations so that individuals who are desirous of career advancement have a pathway to doing so. The proposed new PEI form will enable qualified NPAs in the AbilityOne Program to document their compliance with both of these regulations. Additionally, the Commission is in the process of implementing a new policy, 51.405, which will set forth the employee career development NPAs are required to provide. The form allows NPAs that are already providing such employee career development to report their activities in this area.
 - o Given the Agency’s mission, “To tap America's underutilized workforce of individuals who are blind or have significant disabilities to deliver high quality, mission-essential products and services to Federal agencies in quality employment opportunities,” the Commission has a strong interest in ensuring that the employment opportunities it is providing are high quality employment opportunities. To that end, this form provides critical data to the Commission that will enable the Agency to develop a qualitative and quantitative view of the types of opportunities that exist in the Program, the amount of compensation participating employees are receiving, the types of job supports being provided to participating employees, and information about employee career development provided to participating employees.
 - o To ensure compliance with the JWOD Act and implementing regulations, data must be collected on an annual basis.
- Describe how the information will be collected (e.g., written forms, telephone, online, electronically). Also, describe who will oversee the collection of information (e.g. independent evaluator, trained moderator, self-administered).

- The information will be prepared by a qualified evaluator at each NPA and will be collected electronically. The collection will then be facilitated by the central nonprofit agencies (CNAs) that have been formally designated by the Commission to assist NPAs participating in the AbilityOne Program and will ultimately be overseen by the Commission’s Director of Program Oversight.
 - For each information collection that is electronically not “fillable,” “fillable,” and/or “submittable,” explain why.
 - The information collected will be in a fillable electronic format. Electronic format allows for all the information to be submitted in a timely manner and accessible to the Commission.
 - Consequences if collection is not conducted. Describe the consequence to a Federal program or policies if the collection is not conducted or is conducted less frequently and describe any technical or legal obstacles to reducing burden.
 - If the proposed collection is not conducted, the Commission will be unable to determine whether and the extent to which NPAs in the AbilityOne Program are maintaining their qualification for the program by providing annual evaluations for each participating employee as required by 41 CFR 51-4.3(c)(2), whether those NPAs are providing the necessary job supports and accommodations to employees who are blind or have significant disabilities as required by Commission Policy 51.403, and whether the participating employees are being afforded opportunities for career advancement as contemplated in 41 CFR 51-4.3(b)(8). Accordingly, the proposed form is important to the Commission’s oversight and determination of an NPA’s compliance with regulatory and policy requirements.
2. Use of the Information. Indicate how, by whom, and for what purpose the information is to be used (e.g., program administration, application for benefits or services, regulatory compliance, inform policy development).
- The information will be used by the Commission to determine whether and the extent to which NPAs in the program are maintaining their qualification for the program by providing annual evaluations for each participating employee as required by 41 CFR 51-4.3(c)(2), whether those NPAs are providing the necessary job supports and accommodations to employees who are blind or have significant disabilities as required by Commission Policy 51.403, and whether the participating employees are being afforded opportunities for career advancement as contemplated in 41 CFR. 51-4.3(b)(8).
 - The data will support and measure progress toward the Commission’s 2022-2026 Strategic Plan, specifically its strategic objective to identify, publicize, and support the increase of good and optimal jobs in the Program. The data will be used to inform the Commission about the effectiveness of qualified NPA’s outplacements and related activities, and the intersection between the NPA’s and other Federal, State, and local agencies that may provide funding for job supports, accommodations, or activities that support the employee career development.
- For program evaluations, research studies (including formative research), and surveys, describe the specific goals and purposes of the study as well as the specific research questions that the study will address. Describe whether this study will be used strictly as

feedback for internal programmatic use only, or whether it will provide performance measures for Congress or OMB, inform policy, inform agency rulemaking, or be published as an agency report or a report to Congress. Include a discussion of the strengths and weaknesses of the proposed design and its suitability for the intended uses.

- As stated above, the data collected will serve both a compliance function while also providing data to measure the Commission's success in the implementation of its 2022-2026 Strategic Plan. Those reasons stated above are reincorporated here.
- This data will be used to highlight the good jobs offered in the program, a mission with two related objectives. First, telling the story of the program will enable the Commission to provide hard data to our federal colleagues about the positive impact the program is having in the lives of blind and significantly disabled individuals. The Commission believes doing so will also encourage existing federal customers to consider increasing the number of products and services they procure from the program. That in turn will lead to the Commission's primary objective, providing high-quality employment opportunities to blind and significantly disabled individuals while providing quality products and services to the federal government.
- The Commission notes that one weakness is that when employees leave the program there will be cases where the NPA may not be aware why the employee has chosen to leave and hence cannot provide that data in the form.

- For an existing collection, describe the use (or principal uses if there are more than one) of the previously collected information, whether by the agency or by other entities.
 - Not applicable, this is a new collection.

- Address whether this information will be used by other Federal agencies or not. If so, for what purposes? Are there any privacy concerns related to this information sharing? If so, how have these been addressed?

- The Commission's primary purpose for this form and the associated information is for its own use in monitoring compliance with the Commission's regulations and policy, and generally providing oversight of the program. The Commission may share the aggregate data regarding types of significant job supports and accommodations, types of employee career development activities, and funding relationships with other Federal agencies that have a related mission in supporting the employment of people with disabilities.
- The form does not collect any personally identifiable information as that term is used by the Privacy Act, 5 U.S.C. 552.

3. Use of Information Technology. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

- The collection of information will be by electronic means on an annual basis. The decision to use an electronic means of collection was made because it is the most

efficient, least costly, most accessible, and most useful to the Commission for purposes of interpreting the data collected.

4. Non-duplication. Describe efforts to identify duplication.

- The CNAs in the program currently collect some of the information requested in this form. The Commission has met with the CNAs and NPAs in the program. To the extent that a CNA collects any of this information presently, those efforts will not be duplicated. That expectation will be made explicit in the Commission's cooperative agreements with the CNAs.
- Describe the steps taken to ensure that this information is not collected elsewhere and that it could not be otherwise obtained. If the information has already been collected by your agency, another Federal agency, a component of State or local government, or other public or private non-governmental entity, explain whether your agency could obtain the information from these sources.
 - The Commission is the only Federal agency that has oversight of the program and that is collecting information from NPAs about job supports and accommodations, employee career development, and the resources used for these activities. Therefore, this collection will not duplicate information being collected by any other Federal agencies.
- Describe specifically why any similar information that is already available cannot be used or modified to be used for the purposes described.
 - There is no similar information available or reported to other agencies.
- For program evaluations, surveys, and research studies, provide a brief review of literature on this topic and explain why the existing information is not sufficient to meet the current needs of the agency.
 - Not applicable, this form is not for program evaluation, survey or research studies.

5. Burden on Small Business. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. Did the agency consider any exemptions, alternate options, or partial or delayed compliance options for small businesses?

- All organizations that participate in the program are nonprofit agencies; by definition, they are not considered to be small businesses. The NPAs range in size from only a few employees at one end of the spectrum to very large entities that have more than 1,000 employees. The NPAs elect to participate in the program in order to be eligible to serve as contractors for product and service requirements on the Commission's Procurement List, thereby creating jobs for the NPAs' workforce with disabilities. Each of the NPAs is already required by the Commission's regulation 41 CFR 51-4.3(c)(2) to conduct an annual evaluation of each participating employee and to file the information. As the NPAs have done previously, this form requires them to document each participating employee's job, disability, functional limitations and accommodations. The proposed form will also be required annually but has been designed with check boxes and will be administered electronically, to reduce the

burden of completing the form. Importantly, the instructions for the proposed form will make clear that the number of individuals for whom the form must be completed is lower than the number covered in the current collection. The program currently has 37,377 participating employees. This form will be completed annually only for those employees. In contrast, the current annual form is completed for over 62,798 individuals hired by NPAs to work on contracts outside the program.

6. Less Frequent Collection. Describe the consequence 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.
 - o If the information is not collected or is collected less frequently, the Commission would not be able to determine compliance with certain regulatory requirements, namely 41 CFR 51-4.3(b)(8) for placement programs and 41 CFR 51-4.3(c)(2) for annual reports that evaluate the work potential, interests, aptitudes, and abilities of persons with disabilities. The data provided in this form allows for the Commission to ensure that NPAs participating in the program are providing good jobs as articulated in the Commission's 2022-2026 Strategic Plan. For example, collecting the proposed information annually allows the Commission to monitor the prevalence of certain job supports and accommodations, the trends in external resources availability for job supports, accommodations, and employee career development, changes in participating employees' income year-over-year, and employment outcomes such as lateral, upward, or outward mobility from the baseline program job positions.

7. Paperwork Reduction Act Guidelines. 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;
 - o Not Applicable, the proposed form will be required annually.
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - o The form will be completed for each participating employee, but completion of the forms will occur over the course of a year.
 - requiring respondents to submit more than an original and two copies of any document;
 - o Not Applicable
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - o Not Applicable
 - 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;
 - o Not Applicable
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - o Not Applicable
 - 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- o Not Applicable
- 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.
 - o Not Applicable

8. Consultation and Public Comments. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

- o The agency's 60-day notice was published on May 3, 2024 (89 FR 36774).
 - o The agency's 30-day notice is scheduled to be published on or about November 6, 2024.
- Did the agency receive any comments in response to the required Federal Register notice?
 - o The Agency received 48 comments in response to the FR notice.
 - Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. If the agency declined to make changes in response to particular comments, explain why. Specifically address comments received on cost and hour burden. Address whether any of the instruments were changed and how.
 - o Note: The Commission's 60-day notice for this form referred to it as the "Individual Employee Information form," however, it is now called the Participating Employee Information form.
 - o A few commenters stated their support for the Commission's purposes of helping ensure the integrity of and furthering the mission of the Program. A commenter noted that some aspects of the information collection are simplified, while promoting the growth and development of Participating Employees. One commenter stated that the forms present a good opportunity to collect data to measure Program accountability and increase transparency.
 - o The Commission also received comments questioning the necessity of collecting the proposed information and asserting that the information to be collected was too extensive or excessive. Some comments noted that the proposed data collection is not required by law. Some also stated that the rationale for collecting the information was too general to substantiate the collection. Finally, some commenters requested information about the Commission's planned use for the information.
 - o In addition, the Commission received comments expressing concerns over the potential collection of personally identifiable information (PII) covered by the Privacy Act. Some suggested that personal identifiers could raise concerns for NPAs under the Americans with Disabilities Act (ADA), and still others are concerned that the Health Insurance Portability and Accountability Act (HIPAA) may be implicated. However, no commenter offered a legal analysis as to why HIPAA would be implicated.
 - o Other commenters suggested revisions to the disabilities and job supports listed on the form. Commenters also noted that some employees might object to listing additional disabilities beyond those qualifying them for the program.

- A number of commenters questioned why the wage data was required and stated that the wage data requested on the form would require significant work by different employees to complete.
- Commenters expressed concerns about providing data regarding employees' career mobility and requested clarification as to how to fill out the form for an employee who did not desire career mobility.
- One commenter requested clarification as to why the form requested both the date of hire and the date of eligibility for an employee.
- One commenter suggested a space on the form in which they could articulate any unique circumstances that were not otherwise addressed in the form.
- As to the burden of completion, commenters opined that the Commission's estimated time for completing the form was too short, though only a few offered an alternative estimate. Similarly, one commenter questioned the Commission's assessment of the salary for someone completing the form, but here again, the Commission received little feedback as to an alternative amount. Some commenters contrasted the proposed form to the Commission's prior requirements for information, which required record keeping but not data reporting. Commenters noted that the CNAs presently collect some of the information collected in this form.

In response to the comments received, the Commission has significantly updated the form.

- First, to address the privacy concerns, the form will no longer require the name of any employee. Instead, the form will have only a form reference number. The NPA will maintain the information required to associate the form with the specific employee, and the NPA will make that information available for certain employees during qualification assessments. In order to share this information with CNA staff during compliance inspections, the NPA will have been required to collect any consent forms that might be required under law from the individual at the onset of employment, or the NPA will be required to meet an exemption under the law.
- With respect to the Privacy Act, the law does not apply because the forms will not be retrievable by the Commission via a search of any personally identifiable information. Moreover, searches of the forms will be limited to the broad category of an NPA and any form references numbers that may appear in that search will not be able to be correlated to any personally identifiable information. Therefore, the Commission is confident the Privacy Act is not implicated in the collection of this information.
- With regard to HIPAA, the Commission believes that, even to the extent some NPAs are covered entities under that law, submitting the form would constitute an exception for disclosures required for "[e]ntities subject to government regulatory programs for which health information is necessary for determining compliance with program standards[.]" 45 CFR 164.512(d)(1)(III). Moreover, the Commission has removed personal identifiers from the form, creating another built-in layer of privacy. If an NPA believes that submitting the form would constitute a transaction under 45 CFR Part 162, the NPA should consult with its HIPAA compliance officer for any updates to its existing HIPAA release form(s).
- With regard to the Americans with Disabilities Act (ADA) and the inclusion on the form of information about an employee's disability and the reasonable accommodations

the employee is receiving, it is true that the ADA requires that such information should be kept confidential, subject to only limited exceptions. However, an exception exists where release of the information is required or necessitated by another Federal law. Since disability is a statutory prerequisite to be able to count an individual's direct labor hours toward an NPA's ratio under the JWOD Act, proof of disability is necessary for complying with the law. To the extent NPAs have any additional concerns, they may also obtain the authority to release this information for these very limited purposes upon hire.

- This form does not change an NPA's record keeping requirements except insofar as the NPA is required to maintain a record of which employee is associated with which Form Reference Number. That duty is a natural consequence of NPAs' regulatory requirements to maintain a file on each employee as required to participate in the AbilityOne Program. See 51.4.3(b) and (c).
 - With regard to comments about the difficulty of providing information on wages, the Commission has deleted the questions regarding the average hours worked per week and median wages. Instead, the form asks only about the employee's W-2 wages in the past calendar year and the employee's hourly wage as reflected on the most recent pay stub for the employee.
 - Regarding the comment about the form containing date of hire and date of eligibility, the Commission has removed both fields.
 - The listed disabilities were reorganized, as were the significant job supports, and supports were added in response to specific suggestions.
 - The form makes clear that only the disability(ies) that qualifies the individual for the program must be recorded on the form, although employees may choose to provide information on other disabilities (particularly those for which they are receiving job supports).
 - With regard to career mobility, collecting and analyzing data in this area is necessary to identify the career opportunities available in this program. The Commission has also added an option permitting the NPA to note an employee's desire not to participate in career mobility and, in addition, to record whether the employee's desire not to move to a job with higher pay was due to the employee's concern with losing government-funded health care or other benefits.
 - In response to a commenter's suggestion, the Commission added an optional space on the form in which the preparer can articulate any unique circumstances that were not otherwise addressed in the form.
 - With respect to burden, the Commission agrees with commenters that some of the information requested in this form is already being collected by one of the CNAs. Once this form is approved, the CNAs will be required to have an electronic data system that can collect this information, and the Commission will ensure the CNAs will not be collecting information that duplicates the information in this form.
 - Based on all of the comments received, the Commission has revised its estimate for completing the form upward to two hours.
- Describe efforts to consult with persons outside of the agency, including but not limited to soliciting views on the availability of data, the frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data

elements to be recorded, disclosed, or reported. This could include public meetings, outreach to stakeholders, review panels, and advisory committees.

- The Commission met multiple times with a volunteer “Compliance Council” comprised of NPAs in the AbilityOne Program who will be responsible for completing the proposed form. The NPAs in this group provided written and verbal comments. The Commission conducted informal outreach to other NPAs to seek feedback on the addition or adjustment of particular data elements. The Commission dedicated its 1.5 hour public engagement session during its October 24, 2024 virtual public meeting to comments about this and two other proposed information collection actions.

- Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.
 - The Commission believes it would be appropriate and useful to consult with the NPAs, at least every three years, with regard to the data being collected.

9. Gifts or Payment. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

- Is the agency proposing to provide any incentive (monetary or non-monetary) to potential respondents to obtain their information or to encourage respondents to provide the requested information?

- No, the agency is not proposing any incentives to respondents.

- If yes, explain why it is appropriate for the agency to provide the proposed incentive (and the proposed amounts) and why it is necessary to obtain information of sufficient quality for the intended purposes, including citations to past practices for this or similar Federally funded collections, and specific research to examine the effects of providing incentives for this or similar collections. Specify the amount of each proposed incentive and how the incentive will be provided to the respondent.

- Not applicable

- If the agency is proposing an experiment to examine the potential effects of incentives, describe the different experimental conditions, why they were chosen, and the minimum detectable effects between conditions.

- Not Applicable

10. Privacy & Confidentiality. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

- Provide the exact language of any statement(s) that will be read or provided to respondents that explain how their information will be handled and protected by the agency.

- The form now requires only a form reference number so that no PII is collected on the form.

- If the agency is pledging to keep the information “confidential,” then provide the citation for the statute that the agency is using as the basis of its confidentiality pledge. Include the appropriate excerpt from the statute here or as a supplementary document. Note: if the statutory basis for assuring confidentiality does not exist, the term “confidentiality” cannot be used. Instead, the document should explain any procedures that will be in place to protect respondent data.

- Not applicable, no PII information is being collected on the forms.

- If the Privacy Act applies, the agency should discuss how the data will be managed under the Privacy Act.

- Privacy Act does not apply because no PII information is being collected on the forms.

- Are respondents required to submit proprietary trade secrets, or other confidential information? Explain the procedures that the agency will implement to protect the information’s confidentiality to the extent permitted by law.

- No, respondents are not required to submit proprietary trade secrets or other confidential information.

- Will the agency collect any personally identifiable information? In general, “personally identifiable information” refers to information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal information that can be linked to a specific individual.

- No, the agency is not collecting PII on this form.

- Complete a privacy impact assessment in full compliance with 44 U.S.C. 3501 note § 208? If so, provide a link to the privacy impact assessment on the agency’s website or explain why the agency has determined that making the privacy impact assessment publicly available is not practicable (see 208(b)(1)(B)(iii)).

- Not Applicable

- Collect any information that will be included in records that are subject to the Privacy Act of 1974 (5 U.S.C. § 552a)?

- Not Applicable

- Include a Privacy Act statement on the instrument(s) that clearly informs the individual regarding (OMB Circular A-108):

- the agency’s authority for the collection,
 - whether providing the information is voluntary or mandatory,
 - the principal purpose(s) for which the information will be used,
 - the routine uses which may be made of the information, and
 - any effects on the individual of not providing certain information.

- Privacy Act does not apply. The agency is not collecting PII on this form.

- o Provide the URL link to the most recent version of the system of records notice (SORN) in the Federal Register and/or on the agency website. The agency should briefly describe how it has considered and addressed privacy issues pertaining to the collection. For example, explain how the agency is collecting only the minimum personally identifiable information that is necessary to accomplish a purpose required by statute, regulation, or executive order.
 - No SORN is needed. The agency is not collecting PII on this form.
- Will the agency use information technology to collect, maintain, or disseminate information that is subject to the E-Government Act of 2002 (44 U.S.C. 3501 note)?
 - o No, the Agency is not collecting, maintaining, or disseminating any information that is subject to the E-Government Act.

11. Sensitive Questions. Provide additional justification for any questions of a sensitive nature.

- Is the agency proposing any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, income, immigration status, or other matters that are commonly considered sensitive? (Note that the term “sensitive information” is distinct from the term “personally identifiable information,” although information may fall into both categories.)
 - o The form includes information regarding an employee’s disability and any job supports required by that employee. The form also includes the employee’s yearly wage from the previous calendar year and the employee’s most current hourly wage.
- This justification should include the reasons why the agency considers the questions necessary and the specific uses to be made of the information.
 - o Information regarding an employee’s disability and any job supports required by the employee is required for that person to be determined eligible for the program. The salary information is necessary to demonstrate that well-paying jobs are available in the program.
- Provide any instructions given to respondents as to why the agency is collecting the sensitive information, whether providing the information is voluntary or mandatory, and what consequences, if any, would result if respondents decide not to answer.
 - o Respondents understand that they are eligible to receive sole-source contracts under the program only if 75% of the direct labor hours performed by their employees are performed by individuals who are blind or significantly disabled. While the Disability Qualification Form requires the collection of such information regarding all employees of the NPA (even those working on contracts not obtained under the program), the statutory and regulatory requirements permit the Commission to collect information on this form solely for the smaller number of employees working on program contracts.

As noted for these employees, the Commission requires information on their disabilities, the job supports to establish their eligibility for the program. In addition

information regarding the wages and career mobility of the employees are important to demonstrate the career opportunities in the program. As noted above, none of this information on the form will be identifiable to a particular employee.

A respondent that does not wish to complete the form does not have to participate in the AbilityOne program.

- Explain what steps, if any, the agency is taking to obtain the consent of the respondents when collecting this information.
 - Not applicable

12. Burden Estimate. Provide estimates of the burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government.’

Explain the reason for any changes to the burden and fill out the tables below (*or another table that explains the changes, as appropriate). These could involve one of the following.

- Changes Due to Adjustment in Agency Estimate: An “adjustment” to a burden estimate is made for two purposes: (1) when more (or fewer) individuals or entities respond to an information collection as a result of factors outside an agency’s control (e.g., the number of respondents to a collection can increase or decrease due to changes in demographics or in the level of economic activity), or (2) when an agency re-estimates the amount of burden that a collection imposes (e.g., the agency develops an improved methodology for estimating the burden that a collection imposes). In either situation, the agency has not made any change to the collection itself, and thus there has is simply an adjustment to a previously approved burden estimate.
- Program Change Due to New Statute: These changes in burden occur when new laws are enacted or regulations are promulgated that require agencies to collect new information. Please provide the title, and a brief description of the statute, along with the information collection requirement that the statute is imposing.

- Program Change Due to Agency Discretion: These occur when agencies make a decision to increase (or decrease) the burden that a collection imposes on the public (e.g., by reducing the number of questions on a survey), or when establishing a new collection, that is not explicitly required by law.
- Change Due to Lapse in OMB Approval: These changes in burden occur when OMB's approval of a collection expires without an agency discontinuing or renewing them (which results in a burden decrease), or when an expired collection is reinstated (which results in a burden increase). If, for example, a collection expires in one year, overall burden during that year decreases by the burden total associated with the collection. If the collection is reinstated in the subsequent year, overall burden during that subsequent year increases by the amount of the collection.

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses for this IC	37,377					
Annual IC Time Burden (Hour)	74,754					
Annual IC Cost Burden (Dollars)	\$2,308,404					

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

- **Reporting:** Requests for information for transmission to the Federal government, such as grant application forms, written report forms, telephone surveys, and electronic data collections.
- **Recordkeeping:** Requirements, which may involve compilation and maintenance of records, either alone or in conjunction with the reporting of information to the agency and/or some other person.
- **Third-party or public disclosure:** Requirements which may involve a requirement to disclose information to other members of the public directly or through publication in media such as newspapers or magazines, or to post the information on labels.

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	0	0	0
Record Keeping	0	0	0
Third Party Disclosure	0	0	0
Total	0	0	0

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	0	0
Record Keeping	0	0
Third Party Disclosure	0	0
Total	0	0

13. Estimated nonrecurring costs. Provide an estimate for 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 already reflected on the burden worksheet).

- 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 record storage facilities.

- No cost associated

- 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 purchasing or contracting out information collections 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.

- No cost associated

- 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.

- No cost associated

14. Estimated cost to the Government. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

- No cost to the Government because the CNA will be maintaining the electronic system and utilizing the program fee to pay the necessary expenses.

15. Reasons for changes. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

- No program changes or adjustments are reported on the burden worksheet.

16. Publicizing Results. 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.

- The Commission will determine how and when aggregate data collected from this form will be made available to the public. The Commission will use existing staff and resources to publish the data on its website.

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

- Not applicable

18. Exceptions to "Certification for Paperwork Reduction Submissions." Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

- Not applicable

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods. If this request includes surveys or censuses or uses statistical methods (such as sampling, imputation, or other statistical estimation techniques), a Part B supporting statement must be completed.

- Not applicable