

**SUPPORTING STATEMENT – PART A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

The Rehabilitation Services Administration (RSA), Training and Service Programs Division (TSPD) is requesting clearance for the 84.421F Disability Innovation Fund (DIF) Evidence Building Support (EBS) data collection activity. As part of EBS, the EBS team will conduct annual virtual interviews with the 84.421F DIF grantees (N=27) in grant years 2, 3, 4, and 5 (Calendar Year (CY) 2026-CY 2029). This is a new information collection request.

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Consolidated Appropriations Act, 2023 (Pub. L. 117-328) authorized the Department to use funds that remain available subsequent to the reallocation of funds to States pursuant to Section 110(b) of the Rehabilitation Act for innovative activities aimed at increasing competitive integrated employment (CIE) as defined in section 7 of the Rehabilitation Act of 1973 (Rehabilitation Act) (29 U.S.C. 705(5)) for youth and other individuals with disabilities. The 84.421F DIF program provides grants to 27 State Vocational Rehabilitation (VR), other State agencies, Public, Private and Nonprofit Entities, including Indian Tribes and Institutions of Higher Education (list of grantees available at [Grantees | Rehabilitation Services Administration](#)) to carry out model demonstration projects designed to develop, implement, refine, assess, and disseminate innovative or substantially improved strategies or programs geared toward increasing CIE for individuals with disabilities. In addition, the Consolidated Appropriations Act, 2023, authorized the Department to fund evaluation technical assistance (TA) for DIF activities.

RSA has contracted with Westat and its partners Abt Global, LLC, New Editions Consulting, Inc., and the Council of State Administrators of Vocational Rehabilitation (CSAVR) (henceforth referred to as the EBS Team) to assist RSA to provide the 84.421F DIF grantees with evaluation TA to assess grantees' annual performance and implementation outcomes. The EBS Team's efforts include providing evaluation TA, collecting data, and reporting on performance measures to provide meaningful information about whether individual grantees and the overall 84.421F DIF program are making progress towards program goals. The EBS Team will use data from annual grantee project director interviews to inform the *Annual Evidence Report* prepared for RSA.

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

The EBS Team will conduct semi-structured interviews with 84.421F DIF project directors to inform the annual evidence report, which serves multiple critical purposes. For grantees, the report will offer insights into the purpose, implementation, and outcomes of their programs and independent evaluations, equipping them with actionable information to refine and enhance their efforts. For RSA, the report will provide a consolidated summary of evaluation activities and emerging findings across grantees, supporting the coordination of ongoing initiatives and facilitating effective communication with external stakeholders, including other federal agencies and congressional staff. The research questions addressed by the evidence report include:

1. What were the goals and designs of the 84.421F DIF grant projects?
2. What were the evaluation features and limitations of the 84.421F DIF grant projects?
3. How successful were 84.421F DIF grantees in recruiting and enrolling participants, and what challenges did they face?
4. How did 84.421F DIF grantees implement their programs and measure participant engagement across models?
5. What were the observed outcomes of 84.421F DIF grantee programs, and what factors contributed to or hindered success?
3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The primary mode of data collection will be individual semi-structured interviews with grantee project directors, which is the most effective approach for gathering in-depth insights not captured through the structured performance measures submitted to RSA. Due to the qualitative nature of this activity, electronic submission of responses (e.g., online forms) is not feasible. The data collection plan aims to efficiently obtain information while minimizing respondent burden by leveraging technology to the greatest extent possible. The 90-minute interviews will be conducted virtually using Microsoft Teams, allowing respondents greater flexibility in scheduling and participation compared to an in-person interview. This will be particularly important given the geographic distribution of grantees across the country. With participant consent, interviews will be audio-recorded to ensure accurate transcription and minimize the need for follow-up clarification, thereby reducing overall burden. Interview invitations, reminders, and other communications will be sent via email.

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

There are no other data sources that contain a systematic and comprehensive collection of project directors' perspectives and understanding the context of developing and

implementing innovative CIE projects under the 84.421F DIF program. In addition, lessons learned and best practices shared by the grantees may not be as in-depth. Conducting interviews with grantee project directors is essential to understanding the context in which each project was implemented. This contextual information is critical for interpreting the lessons learned and best practices shared by individual grantees, and it enables us to draw meaningful syntheses and cross-cutting insights across all projects funded under the 84.421F DIF program.

To avoid duplication of effort and minimize respondent burden, the EBS team will rely as much as possible on existing documents, such as grantee applications and performance measures

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

The data collection plan includes multiple strategies to reduce respondent burden across the board. Participating in the interviews requires only the interviewing time on the part of the project directors. The EBS team will review existing sources of data on the grantee's project planning, implementation, and evaluation activities to ensure duplication is avoided.

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

If the interviews are not conducted, the evidence report will not include critical lessons from projects in the development and implementation of the 84.421F DIF grants. Such a gap would limit the usefulness of the report to RSA and the grantees. Grantee operations evolve and mature over time, and conducting interviews annually is important to capture the development process.

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

- requiring respondents to report information to the agency more often than quarterly;**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances involved with this data collection.

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

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

For the 30 day notice, indicate that a notice will be published. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be

circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-day *Federal Register* notice as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB, was published on [DATE]. [NUMBER] of non-substantive public comments were received. The public comments did not relate or warrant any changes to this information collection request.

The 30-day *Federal Register* notice will be published on **TBD**.

The following subject matter experts were consulted in the development of the interview protocol:

- John Connelly, Director, Research and Grants, Council of State Administrators of Vocational Rehabilitation
- Jarnee Riley, Qualitative Methodologist, Westat

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

There are no planned payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.¹ If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

The 84.421F DIF grant application notifies applicants that “the personally identifiable information (PII) requested on this form is collected as authorized by 34 CFR 645.31 of the Higher Education Opportunity Act, that allows the U.S. Department of Education to seek for non-Federal reviewers to read and evaluate discretionary grant program

¹ Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

applications.” The names and email addresses of project directors will be collected for the limited purpose of grant activities and the interview, including following up with non-respondents. This information may already be available in the public domain as directory information (i.e., grantee websites). The following language will be included on the cover sheet of all information collection forms under the Notice of Confidentiality:

“Information collected for this study comes under the confidentiality and data protection requirements of the Rehabilitation Services Administration (The Education Sciences Reform Act of 2002, Title I, Part E, Section 183). Responses to this data collection will be used only for research purposes. Neither the participating grant programs nor individual respondents will be identified by name or affiliation. All of the information you provide may only be used for research purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).”

Specific steps to guarantee confidentiality of the information collected will include the following:

- Confidential materials will be printed on a printer located in a limited access room. When printing documents that contain confidential information from shared network printers, authorized study staff will retrieve the documents as soon as printing is complete.
- The public report will summarize study findings and may include quotes from project directors without naming individual respondents. The report also may present detailed findings by project.
- Access to the sample files will be limited to authorized study staff only.
- All members of the study team will be trained regarding required procedures for handling confidential data.
- All data will be stored in secure areas accessible only to authorized staff members. Any computer-generated output containing identifiable information will only be accessible to authorized staff members.
- Hard copies containing confidential information that are no longer needed will be shredded.

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

This study will include no questions of a sensitive nature.

12. Provide estimates of the hour burden for this current information collection request. The statement should:

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

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

The EBS team will attempt to conduct interviews with all 27 84.421F DIF grantee project directors. Participating in evidence-building activities is considered part of the grant, and we expect a response rate of 88% (24 of the 27 Grantees). The total respondent burden over the four years is 144 hours. Table 1 shows the annual burden and respondent costs.

Table 1. Estimated Annual Burden and Respondent Costs

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Grantee project director interviews	27	88%	24	24	1.5	36	\$45.04 ²	\$1,621.44
Annualized Totals	27	88%	24	24	1.5	36	\$45.04	\$1,621.44

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

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

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

² Bureau of Labor Statistics (BLS) reports: the mean hourly wage for Business and Financial Operations occupations — which includes roles such as project or grant project directors — is \$45.04 per hour as of 2024. Please see <https://data.bls.gov/oes/#/industry/000000>

compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.

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

There are no annualized capital/startup or ongoing operation and maintenance costs associated with collecting this information.

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

The cost to the Federal government of the design, data collection, analysis and reporting of this information collection over the 4 years is \$134,964 with an annualized cost of \$33,741. This cost includes the costs incurred for designing and administering the interview protocol, processing and analyzing data, and preparing the annual evidence report.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

This is a request for a new collection of information.

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

The interview data are expected to be collected annually from CY 2026 – CY 2029. Interview transcripts for interviews (or notes taken during the interview, if the project director declines permission to record) will be thematically analyzed using a qualitative software package. Coded data will be categorized by research questions, challenges, strategies, and outcomes. Thematic summaries will be generated annually and cumulatively, integrating triangulated evidence from interviews, performance data, and evaluation reports. Emergent themes will be reviewed for recurrence, intensity, and variation across grantees.

To support interpretation, findings will be synthesized through tabular and narrative summaries that show:

- Frequency and distribution of key themes or barriers
- Co-occurrence of challenges and implementation strategies
- Outcome status by grantee type, cohort, or intervention model
- Progress on constructs over time (where applicable)

RSA may disseminate the annual evidence report to the grantees and share it with other government agencies and congressional staff.

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

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

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

This submission does not require an exception to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).