

## **SUPPORTING STATEMENT – PART B**

### **FOR PAPERWORK REDUCTION ACT SUBMISSION**

OMB Number: 1820-XXXX

Revised 07/15/2025

RIN Number: XXXX-XXXX (if applicable)

#### **B. Collection of Information Employing Statistical Methods**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. The following documentation should be provided with the Supporting Statement Part A to the extent that it applies to the methods proposed. For further information, please obtain a copy of the FAQs for statistical surveys by the Office of Management and Budget [via this link](#). The standards and guidelines are available from ICCD's SharePoint site [here](#).

- 1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

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), which includes annual interviews with DIF project directors in grant years 2 through 5 (Calendar Year (CY) 2026–CY 2029). This is a new information collection request. 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 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 for DIF activities. RSA has contracted the services of 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 provide 84.421F DIF grantees with evaluation technical assistance and assess grantees' annual performance and implementation outcomes. The contractor's efforts include developing data collection plan, collecting data, and reporting on grantees' 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 plans to conduct interviews with the 84.421F DIF project directors as a part of evidence building efforts.

The respondent universe consists of the Grant Project Directors for all 27 grantees funded under the 84.421F DIF program. The EBS Team will develop an annual summative evidence report about the 84.421F DIF grants and their outcomes. The annual evidence report will highlight both individual grantee projects and cross-cutting elements and lessons learned. The EBS Team will conduct annual interviews with the project directors to learn more about the grantees' projects in general, progress to date, barriers and facilitators to program implementation, and to obtain qualitative insight into project activities not captured through quantitative reporting. The interviews form a critical data source to ensure comprehensive understanding of the 84.421F DIF program. Therefore, the EBS Team will attempt to conduct interviews with all project directors and not limit to a sample of the grantees. A response rate of approximately 88% (24 of the 27 grantees) for each round of the annual interviews is expected.

## **2. Describe the procedures for the collection of information, including:**

- Statistical methodology for stratification and sample selection.**
- Estimation procedure.**
- Degree of accuracy needed for the purpose described in the justification.**
- Unusual problems requiring specialized sampling procedures, and**
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The EBS Team will include all 27 84.421F DIF grantees in the data collection. Approximately 88% (24 of the 27 grantees) of project directors are expected to participate in each annual interview round. Therefore, the analysis will not involve estimation procedures. There are no unusual problems requiring specialized sampling procedures. To the extent possible, we will gather information from existing administrative data sources such as grant applications, logic models, Annual Performance Reports, and records of technical assistance to reduce burden. Annual interviews with project directors will provide key information not available in written reports, offering timely insights to support RSA's oversight and decision-making.

**3. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.**

The EBS Team has established a strong working relationship with the grantees through individual and group evaluation technical assistance over the last 9 months. In addition, the grantees are aware of RSA's requirement to participate in evidence-building activities. We expect these circumstances will help with minimizing non-response. We will also implement several strategies to ensure that interview participation is easy, convenient and poses the least burden.

- Upon receiving OMB approval, the EBS Team will send an email to each project director including an invitation (Attachment A) to participate in a virtual interview, conducted via Microsoft Teams. The interview will last up to 90 minutes and will focus on gathering detailed information about the project's implementation activities. The email will do the following:
  - Describe the purpose of the interview
  - Provide an overview of the topics
  - Provide a Project Director Informed Consent Information Sheet (Attachment B) in a question-and answer format as an attachment
  - Request the project director provide their availability for the interview over the next three weeks
  - Include study contact information (study phone number and a study email address) for any questions
- For the project directors responding with their availability to participate in the interview, the EBS Team will schedule the interview and send an email (Attachment C) with the interview date and time, a link to the virtual interview, and instructions for logging on.
- A week after the initial invitation is sent, the EBS Team will follow up with a reminder email (Attachment D) to the project directors who have not responded. The reminder will contain information similar to that of the initial invitation email.
- If needed, the EBS Team will follow up with non-responding project directors via telephone (Attachment E) schedule the interview if they agree to participate.
- The interviewer will confirm consent and answer any questions before administering the semi-structured interview protocol (Attachment F).

The EBS Team will provide clear instructions and user-friendly materials, offer technical assistance through a telephone number and contact through a dedicated study email box, schedule interviews at a convenient time for the respondent, and track all communications and monitor progress regularly.

The team will minimize burden by avoiding questions for which information is already available through administrative data. In addition, the interview instrument has been reviewed by subject matter experts to ensure that the instructions are clear and that the interview can be completed within the expected amount of time.

**4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

The interview instrument is designed as a semi-structured tool, allowing flexibility in its administration. Furthermore, each 84.421F DIF grantee has a unique approach and no two grantees are the same. Therefore, it is not possible to reliably pre-test the interview instrument. The instrument has been reviewed by subject matter experts (listed below) who have experience in collecting interview data from similar programs including individuals with disabilities.

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

**5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.**

- David Wittenburg, PhD, Westat, Principal Investigator. Ph: 301-610-5522
- Mustafa Karakus, PhD, Westat, Project Director. Ph: 301-279-4528
- Jarnee Riley, MS, Westat, Qualitative Methodologist. Ph: 240-453-2724
- Erika Bonilla, MS, Westat, Project Manager. Ph: 301-610-4879