

OMB Package for

**“Assessing the Needs of State Vocation Rehabilitation Agencies and
State Rehabilitation Councils for Technical Assistance”**

December 29, 2006

OVERVIEW

This submission is for data collection for the project “Assessing the Needs of State Vocational Rehabilitation Agencies and State Rehabilitation Councils for Technical Assistance.” The project’s central purpose is to identify technical assistance needs and preferred methods for receiving that assistance in order to improve the performance of the State VR programs, the effectiveness of SRCs, and ultimately, the outcomes of individuals with disabilities served by the VR program. The package includes two questionnaires to be used in the needs assessment, one for State Vocational Rehabilitation (VR) Agencies and one for State Rehabilitation Councils (SRCs). These instruments are designed to be used on a one-time basis following approval of this package.

The needs assessment questionnaires are intended to be completed by all 80 State VR agencies, as well as all of the SRCs. Both instruments to be used will be placed on the Web, and respondents will respond electronically. The State VR Agency Needs Assessment Questionnaire has five modules, each of which is to be completed by a different member of the State VR agency staff: (1) the State VR Agency Director; (2) the director of financial management for VR; (3) the director of human resources for VR; (4) the Director of field services/ counselor supervision for VR; and (5) the liaison to the State Rehabilitation Council. There is some overlap in content across these modules, but most of the items are unique to the module. The SRC Needs Assessment Questionnaire is designed to be completed by the Chairpersons of the SRCs, although Chairpersons are encouraged to seek the input of other members. Copies of these instruments are appended to this package.

A. Justification

A.1 Circumstances Making Collection of Information Necessary

The Rehabilitation Act authorizes the Title I Vocational Rehabilitation Services Program, which provides formula grants to States to assist individuals with disabilities to prepare for and engage in gainful employment consistent with their interests, strengths, capabilities, and informed choice. The VR program was reauthorized in Title II of the Workforce Investment Act of 1998 (WIA). Section 105 of the Act requires each State to have a State Rehabilitation Council (SRC) appointed by the State's Governor to advise the VR agency on its activities and operations. The Rehabilitation Services Administration (RSA) of the Department of Education (ED) administers the Title I program.

Section 12(1)(1) of the Rehabilitation Act states that the Commissioner of RSA may "provide consultative services and technical assistance to public or nonprofit private agencies and organizations, including assistance to enable such agencies and organizations to facilitate meaningful and effective participation by individuals with disabilities in workforce investment activities..."

All of government is operating under Congressional mandates to ensure that federally-funded programs are accountable, provide a solid return on investment, and provide high-quality customer service. Over the past year, RSA has undergone a major reorganization aimed at streamlining functions and improving the overall performance and accountability of the public VR program. Under its new organizational structure, the RSA Commissioner provides leadership and direction to a program support staff and two divisions: the State Monitoring and Program Improvement Division (SMPID) and the Training and Service Programs Division (TSPD). In addition to administering the State VR Services Program and conducting monitoring and program reviews, the SMPID will be responsible for ensuring technical assistance be available to State agencies when needed, both to comply with the law as well as to continually improve VR programs and outcomes. The SMPID will achieve this through a designated Technical Assistance Unit and establishment of State Teams assigned to each State agency. The Technical Assistance Unit is responsible for establishing technical assistance resources, both nationally and within each state. It will also collaborate with the newly formed TSPD to identify technical assistance resources and provide technical assistance and training to assist State agencies in program improvement efforts.

On September 30, 2005, RSA awarded a contract to Development Associates, Inc. of Arlington, Virginia to conduct a needs assessment of State VR agencies and SRCs for technical assistance. The objectives of the needs assessment are to:

1. Identify the technical assistance needs of State VR agencies in terms of (a) administrative/ management needs, (b) service delivery needs, and (c) other needs;

2. Identify the most effective means by which technical assistance should be delivered to State VR agencies;
3. Identify the technical assistance needs of SRCs; and
4. Identify the most effective means by which technical assistance should be delivered to SRCs.

A.2 Use of Information

RSA intends to use the information from this needs assessment to design a network of technical assistance providers for State VR agencies and SRCs. The needs assessment will identify priority areas for technical assistance and suggest the most effective means for providing that assistance

A.3 Use of Information Technology

All of the data to be collected under this request will be collected electronically through the use of questionnaires placed on a Web site. The Web site will be designed to be fully accessible to individuals with disabilities as required under Section 508.

A.4 Efforts to Identify Duplication

The study does not duplicate previous efforts.

A.5 Impact on Small Businesses or Other Small Entities

The data collection for the evaluation will be the responsibility of the staff of VR programs and chairpersons of SRCs. Consequently, there will be no burden on small businesses or other small entities.

A.6 Consequences of Less Frequent Data Collection

This request is for a one-time data collection.

A.7 Special Circumstances

The submission does not:

- (1) Require respondents to prepare a written response to a collection of information in fewer than 30 days;
- (2) Require respondents to submit more than an original and two copies of any document;
- (3) Require respondents to retain records other than health, medical, government contract, grant-in-aid, tax records, or consumer counseling and service records for more than three years;
- (4) Require the use of a statistical data classification system not approved by OMB;

- (5) Include a pledge of confidentiality that is not supported by authority established in the 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
- (6) Require respondents to submit proprietary trade secrets.

The responses of specific individuals will not be identified in any report. However, the identity of specific respondents will be provided to RSA so that RSA can effectively design and provide technical assistance for specific VR agencies and SRCs.

A.8 Consultations Outside the Agency

The study plan for this needs assessment, including the two questionnaires, was reviewed by a Panel of Experts during a meeting on June 29-30, 2006 in Alexandria, Virginia. The members of the Panel attending that meeting were:

- Steve Wooderson, Administrator, Iowa Division of Vocational Rehabilitation Services
- Linda Mock, Administrator, Oregon State Commission for the Blind
- William McFarland, Financial Management Specialist, Ohio Rehabilitation Services Commission
- Ronald C. Winter, Director of Field Services, Maryland Division of Rehabilitation Services
- Karen Stanfill, Chairperson, Texas State Rehabilitation Council
- Lawrence S. Abramson, Chairperson, Maryland State Rehabilitation Council
- Deon Locklin, Director, Regional Rehabilitation/Continuing Education Program, Georgia State University
- Cheryl Bates-Harris, National Disability Rights Network

The Panel made specific recommendations for amending the study plan, most of which were implemented. We will publish 60-day and 30-day Federal Register notices to allow public comment.

A.9 Payments to Respondents

The evaluation does not intend to make any payments to respondents.

A.10 Assurance of Confidentiality

As described in A.7 above, the responses of specific individuals will not be identified in any report. However, the identity of specific respondents will be provided to RSA so that RSA can effectively design and provide technical assistance for specific VR agencies and SRCs.

A.11 Sensitive Questions

None of the questions included in the instruments are of a sensitive nature.

A.12 Estimate of Response Burden

The estimated response burden for the two needs assessment questionnaires is shown in Exhibit 1.

EXHIBIT 1
Estimate of Response Burden

Instrument or Module	Number of Responses	Hours Per Response	Total Hours
VR Agency Director Module	80	1.50	120
Financial Director Module	80	0.33	27
Human Services Director Module	80	0.33	27
Counselor Supervisor Module	80	0.50	40
SRC Liaison Module	80	0.33	27
SRC Chairperson Questionnaire	79	2.00	158
Total	479	0.83 (av.)	399

The total cost burden to respondents is shown in Exhibit 2.

TABLE 2
Estimated Cost Burden to Respondents

Instrument or Module	Total hours	Cost Per Hour	Total Cost
VR Agency Director Module	120	\$40.00	\$4,800
Financial Director Module	27	\$30.00	\$810
Human Services Director Module	27	\$30.00	\$810
Counselor Supervisor Module	40	\$30.00	\$1,200
SRC Liaison Module	27	\$30.00	\$810
SRC Chairperson Questionnaire	158	\$30.00	\$4,740
Total	281	\$34.27 (av.)	\$13,170

A.13 Other Cost Burden to Respondents

In addition to the hour burden, there should be no additional costs to respondents. The evaluation should impose no additional capital or operating costs on respondents.

A.14 Cost to the Federal Government

The contract cost for the needs assessment contract is \$352,592.

A.15 Reasons for Changes in Burden

This is a new collection. Therefore, the entire 399 is new.

A.16 Plans for Tabulation and Publication

a. Data Processing

The responses to these questionnaires will be entered by respondents directly into a database associated with a Web site. Close-ended responses will be reviewed and computer-edited. Open-ended responses will be coded, and code numbers will be entered into the database. The process for developing codes will be an iterative process in which a senior staff member reviews a subset of questionnaires to develop initial codes, research staff members code responses and identify cases that fall outside of the codes, and then a final set of codes is developed. The final database will then be imported into SPSS for Windows, in which the data analyses will be conducted.

b. Data Analysis

The data analyses will be designed to address the study objectives as listed in Section A1 of this package. The table below shows the relationship between each of the instrument items and the four study objectives.

Relationship of Instrument Items to Study Objectives		
Study Objective	VR Agency Questionnaire Items	SRC Questionnaire Items
1. Identify the agencies' TA needs related to administrative management, service delivery, and other considerations	1-1 to 1-6, 2-1 to 2-2, 3-1 to 3-2, 4-1 to 4-2	6
2. Identify the most effective means for providing TA to the agencies	1-7, 2-3, 3-3, 4-3	
3. Identify the SRCs' TA needs	5-1 to 5-3	1 to 4
4. Identify the most effective means for providing TA to SRCs	5-4	5
Descriptive variables for cross-tabulations	1-8 to 1-14	

For all evaluation and needs assessment studies, Development Associates employs a set of sequenced steps in conducting analyses. These steps involve: (1) univariate analyses (frequencies, means, standard deviations, etc.) of all evaluation items to examine distributional characteristics and suitability for use in subsequent analysis; (2) creation of

composite variables in cases in which multiple items are used to measure a single construct; and (3) selection of key break variables, and bivariate analyses (cross-tabulations, comparison of means, correlations, etc.) using those variables.

For the State VR Agency Needs Assessment Questionnaire, the two key break variables that we intend to use will be based on the type of agency and the size of agency. There are three types of State VR agencies: (1) combined agencies serve individuals with all disabilities; (2) blind agencies serve individuals with visual impairments; and (3) general agencies serve all individuals with all disabilities except visual impairments. Within a State, there is either a combined agency or both a general and blind agency. We will examine the results to see if there are differences between general and combined agencies, and then decide whether results will be presented separately for two or three groups (general and combined/blind or general/combined/ blind). We will also examine differences based on number of consumers served by the agency. We will then create either two to three categories based on agency size to examine differences in responses across agencies.

We will also use other agency-level variables to examine differences across agencies on specific items. Among the break variables that will be used in this way are: location of the State agency in the State system, whether the agency uses means testing of consumers, whether the agency is under an Order of Selection, the extent to which the State match is met through cooperative arrangements, and the percentages of consumers who are transition-age youth, Social Security Administration beneficiaries, and individuals with significant disabilities.

For certain items on the survey of State VR agencies, responses will be received from more than one respondent group. On these items, therefore, we will compare responses from State Directors, directors of financial management, directors of human resources, and directors of field services/ counselor supervision.

For the survey of SRCs, we will use the same two major break variables used for State agencies, type of agency and size of agency.

c. Reporting

The results of the needs assessment will be presented in a report to RSA. The report will be organized around the four objectives described in Section A1 above.

The first draft of the report is scheduled for delivery on 03/31/07. The final version of the report (after review by the Panel of Experts and two reviews by RSA) is scheduled for delivery on 06/30/07.

A.17 Display of Expiration Date

All approved instruments will display the expiration date for OMB approval.

A.18 Exceptions to Certification Statement

There are no exceptions to the certification requirements in Item 20 of OMB Form 83-I.