

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulations mandating or authorizing the collection of information.

Under section 302 of the Rehabilitation Act of 1973, as amended (Act), the Rehabilitation Services Administration (RSA) provides Long-Term Training grants to academic institutions to support scholarship assistance to students. Students who receive scholarships under this program are required to work within the public rehabilitation program, such as with a state vocational rehabilitation agency, or an agency or organization that has a service arrangement with a state vocational rehabilitation. The student is expected to work two years in such settings for every year of full-time scholarship support. The program regulations at 34 CFR 33-35 and 40-43 detail the payback provisions and the RSA scholars' requirements to comply with them. (See Attachment A: Selected section of Section 302 of Title III of the Act, and program regulations at 34 CFR 386.33-35 and 40-43.)

Section 302 (b)(2)(C) of the Act requires the academic institutions (i.e., grantees) that administer Long-Term Training grants to track the employment status and location of former scholars supported under their grants in order to ensure that students are meeting the payback requirement. Program regulations at 34 CFR 386.34 require each grantee to establish and maintain a tracking system on current and former RSA scholars for this purpose and to report to the Secretary information on the scholars' progress toward fulfilling their obligation towards payback in qualified employment in fields which include clinical practice, administration, supervision, teaching or research in vocational rehabilitation, supported employment, or independent living rehabilitation of individuals with disabilities, especially individuals with severe disabilities.

The Annual Payback Report for which RSA is requesting a revision collects data on the status of "current" and "exited" RSA scholars who are/were the recipients of scholarships. In addition to meeting the requirement that all scholars be tracked, the information collected on the proposed form will provide performance data relevant to the rehabilitation fields and degrees pursued by RSA scholars, as well as the funds owed and the rehabilitation work completed by them.

In addition, OMB reviewed the performance and data collection of RSA Training programs during a PART review in 2006. They gave the program an adequate rating, but cited the quality of data collected on RSA scholars as a deficiency. OMB's recommendations for improvement included:

- 1) Take significant steps to improve the accuracy of information on payback
- 2) Make data on payback and numbers of counselors who met their CSPD standard available to the public; and

- 3) Use existing outcome data to improve program management and direct priorities.

The revisions to this information collection respond to all of these recommendations as follows:

- o To respond to (1) above, the revised Annual Payback Report will be submitted via the Internet through the RSA Management Information System (MIS). This system allows grantees to submit information on all RSA scholars by entering data into fields, choosing from drop-down menus, and selection via “check boxes.” These format changes will improve the quality and accuracy of the data collected by reducing incorrect data or misinterpretation of reporting requirements for several key data fields.
- o To respond to (2) above, data in the MIS is publicly available and searchable via both standard reports and customized queries.
- o To respond to (3) above, the data collected will assist the Commissioner in preparing the Annual Report to Congress of performance data regarding the impact of training programs under the Act, including their effectiveness in assuring that skilled personnel are available to provide rehabilitation services to individuals with disabilities. By collecting data such as the number of RSA scholars entering the rehabilitation workforce, the rehabilitation fields being entered, and the types of employment (e.g. State agency, nonprofit service provider or practice group), RSA can assess the impact of the training program and to monitor and evaluate progress toward meeting the program goal of :
“...increasing the numbers of qualified personnel trained in providing vocational, medical, social, and psychological rehabilitation services, and other services provided under this Act, to individuals with disabilities.”

The need to address OMB’s recommendation is why RSA is requesting a revision and three-year approval of this information collection prior to the current version’s expiration on August 31, 2010.

2. Indicate how, by who, 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.

Grantees are required to track the education and employment status of all students who receive financial support. This information includes: information about cumulative support granted to RSA scholars, graduation dates or other information about scholars completing or exiting programs, scholar-debt in years, program completion data for each scholar, dates each scholar's work begins and is completed to meet his/her payback agreement, current home address and place of employment of individual scholars.

Submission of the Grantee Reporting form is required annually for all grantees that sponsored scholars under current and expired grants. Grantees must submit information on all grantees until they fulfill their payback obligation. The revised Annual Payback Report will be submitted via the Internet through the RSA Management Information System (MIS). This system allows grantees to submit information on all RSA scholars by entering data into fields, choosing from drop-down menus, and selection via “check boxes.” These format changes will improve the

quality and accuracy of the data collected by reducing incorrect data or misinterpretation of reporting requirements for several key data fields. The information collected on the form adheres to the requirements already set forth in regulations and grant agreements.

RSA will use (and currently uses) the information described above to assess grantees' compliance with the requirements of the training program and to report to Congress on progress at meeting the purpose of training programs, which is to "ensure that skilled personnel are available to provide rehabilitation services to individuals with disabilities through vocational, medical, social, and psychological rehabilitation programs". The revised RSA Annual Payback report will collect the information necessary to analyze the program's impact, including the number of RSA scholars entering the rehabilitation workforce, the rehabilitation fields being entered, and the types of employment (e.g. State agency, nonprofit service provider or practice group). This information enables RSA to address the Congressional mandate to secure data based upon program compliance requirements and the annual evaluation of performance indicators. The revised form will provide RSA with more reliable data and give RSA information regarding the program's performance and effectiveness on an annual basis.

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. Also describe any consideration of using information technology to reduce burden.

The information requested on the revised RSA Annual Payback report is submitted by RSA training program grantees (generally institutions of higher education) via RSA's management information system (MIS). The MIS allows grantee institutions to electronically submit information regarding the "payback" status of scholarship recipients via the Internet.. All grantees are required to use the MIS for reporting. An online system has been used in the past and has not posed a hardship, so RSA does not anticipate it to be a problem in the future.

The revised form will significantly improve data quality and consistency because it frequently replaces text boxes with drop-down menus that allow grantees to choose information rather than typing information into text boxes.

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

The RSA Annual Payback Report form is not duplicated elsewhere. No similar information is available from any other sources.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Respondents are state and public or nonprofit agencies and organizations, including institutions of higher education therefore no small businesses or other small entities impacted.

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.

The information in this collection cannot be submitted less than annually because the Rehabilitation Act of 1973, as amended, and its corresponding regulations, require that data on payback be reported to RSA annually by grantees. This form will allow grantees to report required information in a concise, consistent manner and is an essential tool in the collection and continued quality of the payback status records kept by the grantees.

In addition, RSA relies on this information annually for other functions, such as monitoring, provision of technical assistance, budget development, and mandated reports to Congress on performance standards related to program purpose.

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 annually.

-requiring respondents to prepare a written response to 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 it is not designed to produce valid and reliable results that 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 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;

-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;

The only special circumstance above that applies is the circumstance for retaining records for more than three years. RSA training grantees are required by statute to track, maintain and report information on current RSA scholars until all scholars have completed their work obligations. It is the grantees' responsibility to maintain complete and accurate records on all students who receive financial assistance through RSA grants and to submit all required information to RSA on an annual basis. With an obligation of two years of work per year of scholarship assistance received, the majority of scholars must be tracked for four years or more. Failure to report information on both current and exited scholars may result in a cost disallowance found through an audit and may adversely impact a grantee's ability to receive future Federal grants.

8. If applicable, 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 13208(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

RSA administered a beta test of the revised form in February 2009. The purpose of the test was to solicit comments on the revised format and data fields. Eight grantees participated. Grantees did not report an increase in burden using the revised form. All eight believe the addition of drop down boxes and check boxes will increase data quality. Six of the respondents requested RSA provide detailed instructions on how to fill out the form, which was acknowledged by RSA and reflected in the updated User Guide and Instructions. There were several requests for additions to be made to certain drop down boxes.

In addition, we will publish the appropriate 60 and 30 day notices for public comment. Modifications to the form will be made final based on any additional feedback received during the public comment period.

9. Explain any decision to provide any payment or gift to respondents, other than re-numeration of contractors or grantees.

There are no payments or gifts to respondents specific to this data collection.

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

Only aggregate scholar data is used for analysis and public dissemination. All personally identifiable information is kept confidential between RSA and the grantee.

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. This justification should not include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The information collection does not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Provide estimates of the hour 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 in Item 13 of OMB Form 83-I.

Provide estimates of annualized cost to respondents of 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 in Item 14.

Information collected from a beta test estimates it will take one hour or less for grantees to fill out the on-line form. This is consistent with burden estimates provided in previous information collection requests.

Grantees should already be collecting this information for their own internal use, so it will likely take only minimal time to input the required data. The revisions made to the form minimize the burden on grantees to enter data. Many data fields are now pre-populated drop down boxes, which decreases the grantees need to type repetitive information for each scholar. Additionally, the data will roll over from year to year, which will save time and reduce possible errors. An additional feature of the revised form is a summary sheet that will provide detailed information on both current and exited scholars for the grantee to use for purposes of program evaluation.

Average Number of Respondents (RSA training grantees) reporting annually: 350

Average Hours per Respondent for Annual Submission of the Grantee Reporting Form: 60 - 75 minutes for each report submitted.

Total Hours Represented: 400 hours

Note: The "hour burden" of respondents' (grantees) data maintenance and reporting may vary because of differences in their respective numbers of RSA scholars

Estimated Annualized Costs: \$17,500 to \$20,000 (350-400 hours multiplied by an average hourly wage rate of \$50).

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, and testing equipment; and 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 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.

There are no start-up costs.

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.

It is estimated that approximately 150 hours of RSA staff time are required. At an average hourly wage rate of \$45, the estimated annualized cost to the Federal government is \$6,750. This number represents a slight increase in cost compared to the previous estimate of 100 hours.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no program changes or adjustments reflected in the burden estimated for grantees. The reason for the increase is RSA staff time, and related cost, is due to the anticipated investment of more staff time in analyzing and summarizing the results.

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.

RSA will utilize this information in preparing its Annual Report to Congress on the activities carried out under the Rehabilitation Act (see Item #1 above). The aggregate number of rehabilitation personnel being trained and entering rehabilitation fields will be tabulated through use of the Grantee Training Form, specifically page six of the form, which calculate the number of active and exited scholars for each grantee. These totals will be available for dissemination (along with their analysis) in the Annual Report to Congress and on the Department of Education's public website

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.

OMB approval to not display the expiration date is not being sought.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement identified in Item 19: "Certification for Paperwork Reduction Act Submissions,"

B. Collections of Information Employing Statistical Methods

Not applicable.