

- 1) Whether the collection of information is necessary for the proper performance of our agency's function, including whether the information will have practical utility
  - a. This is Associated Industries for the Blind and Beyond Vision's major concern. If the goal is to provide the Committee with information that is accurate and reliable and attested to by Chairman of the Board of Directors and Agency CEO, there are inherent flaws in the process. Many NPA's are governed by VOLUNTEER Boards of Directors. These volunteers come from all backgrounds, not many of which involve an in-depth and up-to-date knowledge of the FAR's. In practical application they will rely on documents prepared at some lower level of the organization and reviewed for what they believe to be accuracy.
  - b. Case in point, Question 7.G reference 2 CFR for Cost Principles. That section of the FAR is 29 pages of small legal detailed information. It is HIGHLY unlikely that a volunteer board chairperson would read, understand, verify implementation at the agency, and then attest.
  - c. Secondly, those NPA's that have reported incorrect information historically (whether intentional or unintentional) will continue to do so.
  - d. We also object to the use of the term "competitive employment" in question 11A. We would argue that NPA's ARE competitive employment. The Quality Work Environment initiative strives to ensure that NPA's are competitive with other non-NPA's.
  - e. We also object to question 7.G regarding Cost Principles. The AbilityOne program enabled by the JWOD Act is an employment program with product and service prices based on "Fair MARKET Price". We object to needing to certify to such compliance as it suggests that it is in some way applicable when it is not.
- 2) The accuracy of our estimate of the burden of the collection of information
  - a. Associated Industries for the Blind and Beyond Vision believe that the estimate for time burden has been GROSSLY UNDERSTATED because reporting time has been segregated from data collection time. As with most reporting requirements, data collection is normally multiples of time spent on the actual reporting. Time would include not only the actual data collection time, but extensive FAR training to accurately determine if correct and accurate data is being collected. NPA's (especially the smaller agencies) may face hardship due to small staff's and limited resources that would have to be reallocated to the new reporting requirements or may be faced with hiring outside consultants or legal consul. This may mean that accomplishment of The Mission may suffer.
- 3) Ways to enhance the quality, utility, and clarity of the information to be collected
  - a. Training provided to NPA's in the pilot program was virtually none. Extensive time needs to be dedicated to education of NPA's and for development of the documentation to support the process.
- 4) Ways to minimize the burden of the collection of information on respondents.
  - a. Eliminate questions that are not supported as a direct requirement of the law.
  - b. Clearly phrase questions to obtain pertinent information without having to reference external documents and legal data.