

# Supporting Statement for Paperwork Reduction Act Submissions

## General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

## Specific Instructions

### 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 regulation mandating or authorizing the collection of information.

Sec. 752(i)(2)(A) of the Rehabilitation Act Amendments of 1992 (attachment A) requires each grantee under this program to submit an annual report to the Commissioner of the Rehabilitation Services Administration (RSA) on essential demographic, service and outcome information. The information collected by RSA will be used to evaluate the program, including the new GPRA requirements, and make recommendations to Congress. It provides RSA with a uniform and efficient method of monitoring the program for compliance with statutory and regulatory requirements and to determine substantial progress required for the funding of all non-competing continuation discretionary grants.

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 information collected via the Form

ED(RSA)-70B has been used by the Department and RSA to evaluate the program and to make recommendations to Congress. The data has provided RSA with a uniform and efficient method of monitoring the program and to determine substantial progress required for outyear funding of all non-competing continuation discretionary grants. An analysis of the data conducted by Mississippi State University Rehabilitation Research & Training Center on Blindness and Low Vision, has allowed RSA to evaluate the services provided by projects and to make budget and funding decisions.

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 collection of data will be completed electronically by all grantees to enhance format accessibility. Grantees will submit their 70B reports on disks to reduce paperwork management and enhance universal access of valuable program information.

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.

ED(RSA)-7-OB is the sole instrument collecting data on services provided under the Title VII, Chapter 2 program.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

This collection does not involve any small business or other small entities.

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.

An annual collection is required under Sec. 752(i)(2)(A) of the 1992 Amendments, and is necessary for the RSA Commissioner to respond to legislative requirements of an annual report to the President and to Congress as mandated by Sec. 13 of the Rehabilitation Act of 1973 (Attachment B). This data must also be collected annually in order for RSA to determine substantial progress required for the annual funding of formula grants to all non-competing Designated State Agencies.

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

- 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

None

- requiring respondents to report information to the agency more often than quarterly;

None

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

None

- requiring respondents to submit more than an original and two copies of any document;

None

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

None

- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

None

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

None

- 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.

None

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 1320.8(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.

During its initial development, the collection instrument and instructions were reviewed by the National Council of State Agencies for the Blind, and almost 90% of the project directors funded under the program. All comments and suggestions were considered and several recommendations were adopted. A special workgroup recommended the current changes for both the Participant Survey and the EDRSA-7-0B reporting form. These changes and were reviewed and comments received by Project Directors at their last annual Project Directors meeting in Washington, D.C.

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.

Refer to answer above.

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

None.

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

All data is reported in the aggregate; therefore, this section is not applicable.

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 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 report form contains no sensitive questions.

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.

The burden for each response was estimated at 8 hours (includes time to tabulate consumer participant survey) by several directors of projects funded under this program.

Number of respondents:	55
Frequency of response:	Annual
Hours per response	8
Annual hour burden	440
Respondent cost - 440 hours x \$17/hr =	\$7,480

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
- 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.

Most of the requested information is currently being collected by the grantees and no additional operational expenses are required

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 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.

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.

Review and analysis of reports 40 hrs x \$30/hr = \$1,200  
Mississippi State University  
Rehabilitation Research Center on Blindness and Low Vision. Contract

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

In response new data collection standards implemented by OMB, respondents will not complete the Participant Survey. RSA will subcontract with the MSU RRTC to collect this 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.

NA

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.

NA

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

None

#### B. Collections 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. When item 17 on Form OMB 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

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 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) intends to contract with Mississippi State University (MSU) RRTC to conduct a transitional effort that would pilot test the use of a Program Participant Survey instrument developed in collaboration with an Independent Living ad hoc committee. The survey instrument relates directly to the Rehabilitation Act and GPRA and will help RSA satisfy the requirements of each, as it relates to measuring or assessing the relevant outputs, services levels, and outcomes of the Title VII, Chapter 2 program. The data collected likewise will provide valuable feedback to the State agency grantees under this program.

The sampling design will be representative of the national population of approximately 13,000 cases for whom services were completed from programs of differing sizes in 52 states and territories, and the sampling strategy will provide a sufficient sample in each agency to make meaningful inferences to the performance outcomes for each grantee. The MSU RRTC will survey approximately 950 individuals where services have been completed during the period of Oct. 1, 2000 through Sept. 30, 2001. Since a telephone survey is planned, MSU plans to have a response rate of 950 individuals.

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 MSURRTC on Blindness and Low Vision has determined that the sample size needed for a national sample is 252 for an absolute error of +/-0.1 of a scale point. For each state, a sample size of 18 utilizing 3 hours for completion was determined to estimate a mean scale value within a minimum of +/-10% (all intervals at the 95% confidence level). Therefore, a total sample of 936 was determined to be adequate. These two parallel sampling plans--stratified (proportional) systematic sampling for the national sample and systematic random sampling within each state--will meet the two goals of the sampling design for the project. This plan will provide a sufficient sample for an accurate portrayal of the national program and, at the same time, provide adequate data for evaluation of individual state programs.

Given the characteristics of the population to be surveyed, a national telephone survey rather than a mailed survey will be more effective in collecting data for this project. Most of the individuals served under this program are legally blind and unable to read regular print.

Therefore, a much better response rate and more meaningful information can be obtained through the use of telephone interviews.

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.

Since a telephone survey will be used, non-response will not be a problem and the number to be sampled will be obtained.

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.

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.

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