

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

Public Law 108-136, the National Defense Authorization Act of 2004, created the Veterans' Disability Benefits Commission and charged it with carrying out a comprehensive study to examine the appropriateness of benefits provided under law to disabled veterans and their survivors to compensate and provide assistance for the effects of disabilities and death attributable to military service. This request for approval of data collection focuses on the Commission's examination of the standards to determine whether a disability or death of a veteran should be compensated and the appropriateness of the benefit levels.

We are seeking approval for the following information collections:

- Survey of disabled veterans
- Survey of surviving spouses of disabled veterans
- Survey of National Veterans Service Officers¹

These surveys are needed by the Commission to:

- Determine how well the benefits provided to service-disabled veterans meet implied congressional intent to compensate for impairment in quality of life due to service-connected disabilities.
- Assess whether the benefit package should be modified. Specifically, does the receipt of certain levels of compensation provide a disincentive to work or to undergo therapy?
- Determine how well benefits provided to survivors meet implied congressional intent to compensate for the loss of the veteran/service member's earning capacity and for the impairment in quality of life due to service-connected disability and death.
- Ascertain insights into the challenges and issues associated with implementing the laws, regulations, and procedures for rating and adjudicating veterans' disability claims and assisting service-disabled veterans and their survivors to prepare and present such claims.
- Information assessing the impact veterans' disabilities has on their quality of life, willingness to seek medical treatment, and labor force participation is not contained in VA administrative records. Information assessing the impact of dependency and indemnity compensation and related benefits on survivors' economic loss and decreased quality of life is also not contained in VA administrative records. There are no current data on the impact of the benefit on the quality of life of surviving spouses and whether the benefit has helped them transition personally and economically after the death of the veteran. Administrative data on the challenges and issues faced by VBA Rating Officials and National Veterans Service Officers (VSOs) associated with

¹ Veterans' disability ratings are made by VBA Rating officials, who are employees of VA. Veterans are assisted by National Veterans Service Officers, who are employees of national veterans service organizations or their state branches. We are surveying both groups, but seeking approval for the survey of National Veteran Service Officers.

implementing the laws, regulations, and procedures for rating and adjudicating veterans' disability claims and assisting service-disabled veterans and their survivors to prepare and present such claims also does not exist.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

The data collected will provide information for sound decisions that affect the system of determining and providing disability benefits to veterans with service-connected injuries and their survivors. The data will be analyzed using qualitative and quantitative methods and the results will be used by the Commission to make recommendations to the Congress and the President about veterans' disability benefits and services. The survey data on the quality of life experienced by service-disabled veterans will be used to determine if the implicit quality of life payments under the current system are internally logical and consistent with the degree of quality of life degradation found across service disability ratings. To do this, the survey data will be used to develop an overall measure of quality of life. The findings will provide information the Commission can use to determine if the program is meeting its congressional intent in terms of properly compensating disabled veterans for their loss of quality of life. The data will also be used to modify policies that are in place for implementing the service disability ratings scale. The data collected from those administering the veterans' disability benefits program and assisting veterans and survivors to prepare and present their claims will be used by the Commission to shape recommendations that impact how the program is administered, particularly in terms of efficiency and coordination with related VA programs and services. The data from all of these surveys will be deleted one year from the termination of the Commission.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The Commission contracted with the CNA Corporation (CNAC) a nonprofit, independent organization that operates a federally funded research and development center (the Center for Naval Analyses), which specializes in military issues. CNAC is responsible for coordinating all of the Commission's research and is subcontracting with ORC Macro to conduct the veteran and survivor surveys using computer-assisted telephone interviewing (CATI). Responses will be entered directly into an electronic database, making the collection of data very efficient and reliable. The surveys of VBA Ratings Officials and National VSOs will be conducted electronically via the internet (<https://www.cnacompass.org/nologin/s.php?016581a4>) to increase efficiency and to reduce potential respondent burden. Respondents for these surveys will submit their responses electronically. This reduction of respondent burden through reliance on technology meets the spirit of the Government Paperwork Elimination Act (GPEA).

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

The Commission has conducted an extensive legislative and historical review of veterans' disability benefits to document existing data sources for answering the study's research questions and to avoid duplication of data collection efforts. The last comprehensive review of the program to provide veterans and their survivors with compensation due to disability and death was conducted in 1971. The standard for awarding benefits is dated and does not take into account developments in medical technologies that impact the quality of life experienced by veterans nor shifts in the national labor market that have provided additional possibilities for labor force participation by service-disabled veterans.

The administrative records that were reviewed and are expected to be used in this research to complement primary data collection include: VA Veterans Benefit Administration records, DoD Defense Manpower Data Center data, Social Security Administration earnings, disability and retirement data, and the Office of Personnel Management records.

Primary data collection is limited to quality of life data and other information that is not available in administrative records or other sources. In preparation for this data collection, current VA administrative databases were reviewed to identify possible current data sources that provide information on the quality of life experienced by service-disabled veterans and their survivors, the ability of service-disabled veterans to participate in the labor force, and the degree to which the disability benefit functions as a disincentive for service-disabled veterans to pursue medical treatment and employment. A review of these existing VA administrative records on service-disabled veterans reveals that there are no administrative records or current data collections that assess the quality of life experienced by these veterans in connection with receipt of the disability benefit, or that assesses the impact of the disability benefit on labor force participation. Additionally, current information on Dependency and Indemnity Compensation (DIC) recipients does not include data on the quality of life experienced specifically as a result of the disability of the veteran.

There are also no administrative data on the conduct and coordination of benefit and service delivery operations from National VSOs that specifically examine the challenges with administering the disability benefits program. The VA Office of the Inspector General recently (2005) conducted a survey among VBA rating specialists and decision review officers to assess reasons why disability claims were lower than the national average in some States compared with others, but this data collection only focused on issues associated with disability ratings claims, and not on the broader national system or the processes for assisting survivors. It also only surveyed VBA raters and did not survey National VSOs.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

No small businesses or other small entities are impacted by this information collection.

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 Commission would not be able to fulfill its congressional mandate to determine the appropriateness of benefits provided under law to disabled veterans and their survivors to compensate and provide assistance for the effects of disabilities and death due to disability attributable to military service. Additionally, VA would not be responsive to the needs of service-disabled veterans and their survivors, as there would be no current data on the impact of the benefit on the quality of life experienced by service-disabled veterans and their families. Without the data collection, any adjustments that need to be made to ensure that the program meets its congressional intent and is internally logical and consistent would not be undertaken. Without this data, policy recommendations for VBA Ratings Officials and National VSOs for the administration of the program would be incomplete and potentially inaccurate.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; 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 is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no such special circumstances. This is a one-time data collection.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor'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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The notice of Proposed Information Collection Activity was published in the Federal Register on July 13, 2006, (Volume 71, Number 132). There were no comments received.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

The Commission held a series of public meetings to discuss the feasibility of the study and to determine the best methods for obtaining the necessary data. These hearings included presentations and discussions on availability of data, frequency of data collection, clarity of instructions and recordkeeping, disclosure and reporting formats, and data elements. Comments

and statements were provided by veterans' service organizations, including those who represent disabled veterans (e.g., Disabled American Veterans, Blinded Veterans of America, and the Paralyzed Veterans of America), organizations that represent surviving spouses (e.g., Gold Star Wives), representatives of VA and DoD disability and retirement programs, and other researchers, interested parties, and the public.

The Commission also conducted extensive legislative and literature reviews of disability benefits for veterans to identify the study questions and to identify the specific research questions that are to be pursued as a part of the survey of disabled veterans, survey of veteran survivors, and survey of VBA Ratings Officials and National Veterans Service Officers.

Various individuals were consulted over time in the planning and development of the surveys, regarding the availability of data, frequency of collection, clarity of instructions, internal VA recordkeeping, disclosure or reporting format, and on the data elements. This included individuals both inside and outside of the agency. ORC Macro's Institutional Review Board reviewed the survey procedures, clarity of instruction, and recordkeeping and disclosure procedures and approved them as being compliant with all of the requirements of 45CFR46, "Protection of Human Subjects." The VBA Privacy Officer in concert with VA's General Counsel approved release of the data under agreements governing protection and disclosure of the study data.

Individuals who reviewed the disabled veterans and survivor survey instruments and the National VSO survey instrument include all members of the Veterans' Disability Benefits Commission:

Chairman: [James Terry Scott](#), LTG, USA (Ret)

Members:

[Nick D. Bacon](#), 1SG, USA (Ret)

[Larry G. Brown](#), Col, USA (Ret)

[Jennifer Sandra Carroll](#), LCDR, USN (Ret)

[Donald M. Cassidy](#), Col, USAF (Ret)

[John Holland Grady](#)

[Charles "Butch" Joeckel](#), USMC (Ret)

[Ken Jordan](#), Col, USMC (Ret)

[James Everett Livingston](#), MG, USMC (Ret)

[William M. Matz, Jr.](#), MG, USA (Ret)

[Dennis Vincent McGinn](#), VADM, USN (Ret)

[Rick Surratt](#) (Former USAF)

[Joe Wynn](#) (Former USAF)

Ray Wilburn, Executive Director of the Commission, and the following members of the Commission staff also reviewed the survey procedures: Dr. George Fitzelle, Dr. Marcelle Habibion, Mr. James Wear, Mr. Steve Riddle, Ms. Kathleen Greve, and Ms. Jackie Garrick. Also assisting was Mr. Dan Cunningham of the Veterans Benefits Administration.

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

No payment or gift is provided to respondents.

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

An assurance of strict confidentiality is made in the introductory letter respondents receive before participation in the surveys and as a part of the introduction to each of the surveys. Respondents are assured that answers given will be kept confidential and used for research and statistical purposes only. The information that respondents supply is protected by law (the Privacy Act of 1974, 5 U.S.C. 522a and section 5701 of Title 38 of the United States Code). Respondents are informed that CNAC and ORC Macro researchers and VA reviewers involved with the study have the professional responsibility to keep answers confidential, that they are bound to do so by law, and that they have signed a legal agreement to keep respondent information strictly confidential. Respondents to the VSO survey are further informed that only CNAC analysts will have access to individual responses and that CNAC will only report aggregated results that do not permit the identification of individual respondents.

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; include 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.

There are no questions of a sensitive nature, such as sexual behavior and attitudes, or religious beliefs, on any of the surveys. However, service-disabled veterans and their survivors will be asked to provide responses to questions about their medical and economic conditions, which may be perceived a sensitive in nature by some respondents. Service-disabled veterans are being asked about their disability and subsequent medical treatments to assess the impact the disability has had on their quality of life, which is the main objective of the survey. Surviving spouses of disabled veterans will be asked to provide responses about the emotional and economic conditions they have faced because of the disability or death of the veteran, also the main topic of interest of the survey.

Respondents will be asked to give informed consent to participate in the study. As such, there is a description of any foreseeable risks or discomforts to the respondent and a statement that participation is voluntary, refusal to participate will involve no penalty or loss of benefits to which the respondent is otherwise entitled, and the respondent may discontinue the survey at any time without penalty or loss of benefits. The informed consent will be obtained in two steps. First, an introductory letter will be mailed to all potential respondents. The letter will outline the purpose, nature, and sponsorship of the research project, the confidentiality of the responses and the methods used to ensure it, as well as the description of the potential benefits of the participation to the VA benefit recipients. The second step in obtaining the informed consent involves reading an introduction to the respondents over the phone before any data collection. All respondents will have a chance to review and discuss the informed consent with the data

collectors, as well as actively consent to research participation before telephone data collection. For the VSO survey, respondents will read and agree to an informed consent statement introduction to the web-based survey.

The study report will not include any information that could identify respondents. The report will include statistical data and other aggregated data for addressing issues about disability benefits for veterans and their survivors. The report will primarily be used by the Commission as it reviews the program and makes policy decisions and recommendations to the Congress and the President.

12. Estimate of the hour burden of the collection of information.

The total burden hours for the data collection with service disabled veterans is based on an estimated sample of approximately 21,221 interviews, while the estimate of burden hours for survivors of service disabled veterans is based on a sample of 1,842. The electronic survey of National VSOs will be a census of approximately 2,000 National Veterans Service Officers. Each respondent will provide only one response to the survey. Table 1 presents the estimated hourly burden.

Table 1. Respondent Burden Estimate

Respondent group	Estimated number of survey respondents	Minutes per respondent	Frequency of response	Respondent burden hours
Service-disabled veterans	21,221	30	1	10,611
Surviving spouses of service-disabled veterans	1,842	30	1	921
National Veterans Service Officers	2,000	40	1	1,333
Total	25,063			12,865

The estimate includes the time to complete the survey in addition to time for the respondent to hear or read the survey introduction and provide consent for participation in the study.

The estimate of annual costs to respondents for the proposed data collections is calculated as the product of the total burden hours for each survey and mean respondent wage rate. For the survey of service-disabled veterans², the annual cost to respondents was calculated as 10,611 hours * \$18.03/hour = \$191,316. For the survey of surviving spouses³ of service-disabled veterans, the annual cost burden was calculated as 921 hours * \$8.73/hour = \$8,040. For the survey of

² The average wage for service-disabled veterans is based on the average annual earnings from the 2003 Survey of Retired Military (SRM), conducted by the Defense Manpower Data Center (DMDC, 2004). The SRM focused on military retirees who left active duty between 1971 and 2001. The survey reported annual average earnings (zero for nonworkers) of \$37,505.58 or \$18.03 per hour (assuming 2,080 hours per year).

³ The average taxable income for 97% of 60,697 DIC surviving spouses of veterans who died between 1994 and 1999, according to a match with 1999 IRS records, is \$20,842 per year. Of this average total, \$4,376 is from wages and the hourly average wage per surviving spouse is \$2.10 (assuming 2,080 hours per year). Source: page 34, <http://www.va.gov/OPP/eval/DICReportMay2001.pdf>

National Veterans Service Officers,⁴ the annual cost burden was calculated as 1,333 hours
*\$28.85/hour = \$38,457.

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).

- a. There are no capital, start-up, operation, or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent (average of 30 minutes per respondent).
- c. There are no anticipated capital start-up cost components or requests to provide information.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation 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.

The total cost to the Federal Government is estimated at \$3,503,951.60.

The table below presents the labor and contracting costs for conducting the surveys. Operational costs have been outsourced to the contractor and are included in the contractor's total cost.

Item	Hours	Cost
VA Labor Cost	600	\$ 34,584.48
Commission Labor Cost		\$20,637.12
Contracting		\$3,448,730.00
Total		\$3,503,951.60

It is estimated that the amount paid to the contractors for the survey of service-disabled veterans and the survey of surviving spouses of service-disabled veterans will cost \$3,448,730.00 . These costs include development of the instruments, development of the sampling plan, review of the instrument, location of respondents, programming of the questionnaire for CATI administration, questionnaire pretest, interviewing, validation, data processing, providing a clean data file, and project management and analysis, results reporting, staff training, and supervision.

The costs for the electronic survey of National VSOs is estimated to be \$105,000. These costs include survey development and design, questionnaire pretest, management of the data collection, nonresponse follow up, validation, data processing, providing a clean data file for analysis, oversight and supervision, analysis, and results reporting.

⁴ We could not find published information on the wages of Veterans Service Officials. Several national veteran service organizations confirmed that VSO typically have college degrees. Therefore, we assume their wage would be at the GS-11, step 5 federal labor rate for 2006, approximately \$60,000 per year. We calculated the hourly rate to be \$28.85 per hour (assuming 2,080 hours per year).

15. Explain the reason for any changes reported in Items 13 or 14 above.

There is a small 162 hour increase in the burden hours. The burden hours increased from 12,703 in the emergency OMB justification submitted to 12,865 in the updated justification. The reason for this is due to a small increase of 324 persons who need to be surveyed in order to adequately provide needed data on all of the cells of interest (see p.18). The numbers of persons to be surveyed increased from 24,739 in the previous justification to the current number of 25,063.

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.

The schedule for data collection and reporting is shown in Table 2.

Table 2. Data Collection and Reporting Schedule

Activity	Time schedule
Develop draft telephone survey of disabled veterans	3/7/06
Develop telephone survey of survivors of service-disabled veterans	3/7/06
Pretest telephone survey instruments	3/13/06-3/20/06
Prepare pretest summary report for changes to survey	3/29/06
Submit OMB clearance package for service-disabled veteran and survivors surveys	3/31/06
Prepare data files and draw sample for telephone surveys	3/15/06-5/1/06
Develop draft internet survey of National VSOs	5/1/06-7/30/06
Conduct interviewer training for telephone surveys	5/10/06-5/30/06
Execute telephone surveys and survey follow-up activities	6/12/06-1/3/07
Pretest survey of National VSOs and prepare final revised version	8/1/06-8/25/06
Submit revised OMB clearance package incorporating National VSO survey	8/25/06
Execute internet survey of National VSOs and survey follow-up activities	10/25/06-12/31/06
Produce final data file for study comparisons	1/4/07-1/20/07
Analysis of data	1/22/07-4/30/07
Produce final report for Commission	5/31/07

Plans for Analysis and Reporting of Veteran and Spouse Surveys

Tabular and multivariate analyses will be conducted to respond to each of the study’s goals and objectives. Initially weighted estimates will be produced to indicate the proportion of each defined population with particular characteristics. This will be accomplished with frequencies and cross-tabulations. Next, multivariate analyses will be pursued to address the remaining analytical objectives of the study. The findings from the surveys will be analyzed and compiled into a report for the Commission’s use. The Commission will use the survey report and combine it with other components of this study to develop recommendations to Congress about benefits for service-disabled veterans and survivors of veterans. The entire study report, including the

findings from these surveys, will be available for public viewing after June of 2007 on the Commission's Web site, www.vetscommission.org.

Analysis of Veteran Survey Data

We will merge the disabled veterans' survey responses with administrative data to inform questions concerning quality of life, labor force participation, and disincentives to complete therapy. The specific research questions include the following:

- How does quality of life vary across disability rating and diagnosis groups?
- How does labor force participation vary across disability rating and diagnosis groups?
- Does the current disability compensation system create disincentives to undergo therapy?

Parts A, B and C: How does quality of life vary across disability rating and diagnosis groups?

We will analyze the service-disabled veterans' survey to determine overall SF-12/36 scale measures of health-related quality of life (from Part B) and measures of life satisfaction (from Part C). From Part B of the survey, we will be able to create the following health scales:

- SF-12 mental health summary
- SF-12 physical health summary
- SF-36 mental health
- SF-36 social functioning
- SF-36 role-emotional
- SF-36 role-physical
- SF-36 bodily pain

From Part C of the survey, we will develop a measure of overall life satisfaction and life satisfaction along multiple dimensions. We will explore developing a life satisfaction index using factor analysis on the survey items in Part C.

Our objective is to determine how quality of life and life satisfaction vary across diagnosis groups and disability rating levels. Ultimately, we want to determine if the current veterans' disability rating system is internally logical with respects to how disabilities affect quality of life and life satisfaction. We will assess differences in the mean levels for the health-related quality of life scales and general life satisfaction measures across our 61 sampling cells using ANOVA (analysis of variance).

Using regression analysis, we will assess how health-related quality of life and life satisfaction vary across diagnosis groups and rating level given we control for difference in demographics. We will explore how demographics affect the quality of life and life satisfaction measures using the following model specification:

$$QoL = f(\text{Diagnosis Group, Rating, Age, Gender, Cumulative Earnings,} \dots)$$

Part D: Does the current disability compensation system create disincentives to undergo therapy?

From the questions in Part D of the survey, we will examine the amount and nature of treatment non-compliance. We will calculate compliance rates and examine how these rates vary among our sampling cells using difference of means testing (ANOVA). This will illuminate if non-compliance is higher within certain diagnosis groups than others. Furthermore, we can use chi-square tests to estimate whether the reasons why some veterans don't undergo therapy vary across the diagnosis groups.

Part E: How does labor force participation vary across disability rating and diagnosis groups?

From the questions in Part E, we will assess labor force participation rates across disability ratings. We will examine the current rate of labor force participation as well as the number of hours worked for those with employment across our sampling cells. We will also examine (controlling for socioeconomic factors) how labor force participation and the number of hours typically worked for those with employment vary by diagnosis group and rating using the following regression models:

$$\text{Probability of labor force participation} = f(\text{Diagnosis Group, Rating, Age, Gender, Education, ...})$$

And then for those who are working,

$$\text{Hours worked} = f(\text{Diagnosis Group, Rating, Age, Gender, Education ...}).$$

Analysis of Survivors Survey Data

The survivors' survey responses will be merged with administrative data to inform questions concerning how the veteran's disability affected the spouse in terms of care giving, foregone education, and workforce opportunities. We will also assess spouses' use and satisfaction with select benefits, their health related quality of life, and their life satisfaction. The specific research questions include the following:

- How much care did survivors provide to the disabled veteran?
- Did survivors forego educational and/or workforce opportunities to care for the veteran?
- Did the death of the veteran lead to changes in the survivors' employment, education, residence, and financial circumstances? If so, to what extent?
- How frequently do survivors use their VA benefits?
- How satisfied are survivors with the benefits they use?
- What are survivors' current employment circumstances?
- How does survivors' health-related quality of life and satisfaction with life compare with national norms?

Part A: How much care did survivors provide to the disabled veteran and did they forego education and/or workforce opportunities to provide this care?

We will tabulate the responses to profile the degree of care giving that survivors provided, and how this responsibility affected their education and employment. We will explore the correlation

between care giving and foregoing educational and employment opportunities. To examine if there are intergenerational differences, we will explore if the proportion of individuals reporting an impact on their education and employment varies by their age when the veteran became disabled and their current age using difference of means testing.

Part B: Did the death of the veteran lead to changes in the survivors' employment, education, residence, and financial circumstances? If so, to what extent?

We will tabulate the responses to explore how the veteran's death impacted the survivor's circumstances. We will examine how these impacts may vary by demographics using the following binary regression model:

$$\text{Probability of post-death change} = f(\text{age at veterans death, current age, previous work status, children, education at veterans death})$$

Post-death changes that we would explore include changing work circumstances, changing schooling circumstances, moving, and changing financial circumstances. For those who make a change shortly after the veteran's death, we will explore, using the above construct, how the probability that this was a forced or negative change varies with demographics.

Part C: How frequently do survivors use their VA benefits and how satisfied are they with the benefits they use?

We will tabulate the responses to profile survivors' use and satisfaction with VA benefits.

Part D: What are survivors' current employment circumstances?

We will tabulate the responses to the questions pertaining to labor force participation to profile the current work circumstance of survivors by age category. Within age categories, we will examine if labor force participation rates vary based on the years since the veteran's death and whether the individual received Survivor Benefit Plan (SBP). Additionally, because we drew several of the employment questions directly from the Current Population Survey (CPS), we can compare survivors' employment rates to those of widows/widowers in the CPS of comparable ages.

Parts E and F: How does survivors' health-related quality of life and satisfaction with life compare to national norms?

We will analyze survivors' responses to the SF-12 questions in Part E and create the associated physical and mental health scales. From Part F of the survey, we also have a measure of their overall life satisfaction and life satisfaction along multiple dimensions. Our objective is to compare survivors' responses to population norms to assess how their quality of life and satisfaction compare. For the SF-12 physical and mental health scales, we will have the norms for the full U.S. population that are contained in the SF-12 documentation. We can also calculate comparison scores for subgroups of the U.S. population from any of the other national surveys that use the SF-36 or SF-12, such as the Medical Expenditure Panel Survey (MEPS) and the Community Tracking Study (CTS) Household Survey. For making comparisons with norms

for the various dimensions of life satisfaction, we will obtain comparable nationally representative estimates from the General Social Survey.

Plans for Analysis of National Veteran Service Officers Data

VSOs are individuals from congressionally chartered veterans interest groups (National Veterans Service Organizations) who are accredited by VA to work in VA facilities to assist disabled veterans and their survivors prepare and present claims. The survey of VSOs will include questions about the uniformity and efficiency of the VA compensation system and its ability to meet the needs of disabled veterans and survivors. The research objectives are as follows:

- To gain insights into the disability rating process and the challenges and issues associated with administering and applying the laws, regulations, and procedures for rating and evaluating claims by veterans and their survivors for compensation or assistance for service related disability or death.
- To gain perspective on the adequacy of VA disability rating policies and procedures, whether they serve the benefit needs of disabled veterans and their survivors, and challenges and issues faced by VSOs in assisting veterans and their survivors to prepare and present claims.

Specific research questions by category include the following:

Views on training, preparation, and needed skills for the rating process

- Perceptions of the kinds of skills and knowledge that are required to effectively apply the laws and regulations related to the rating process and to assist veterans and survivors prepare and present claims for that process
- Perceptions of how well VSOs are trained to perform their roles and what training they have had
- Opinion of the adequacy of office facilities made available to VSOs by VA Regional Offices

Experience assisting veterans and survivors with the claims rating process

- Perception of whether the claims process is fair, how veterans and survivors view it, and whether veterans and survivors understand it and find it satisfactory
- Perspective on the challenges VSOs face in assisting veterans and survivors, and how they may be overcome
- Perspective on relative difficulty experienced providing assistance to various categories of veterans and for various categories claims

Experience with the Regional Office and its Rating Officials

- Perception of the efficiency, competency, and performance of the rating officials in applying the applicable laws, regulations, and procedures, especially regarding uniformity versus variation in evaluation claims
- Perception of the performance of the Regional Office in assisting veterans and their survivors, coordinating with other agencies, emphasis placed on speed and accuracy,

brokering claims to other Regional Offices, and evaluating evidence in support of a claim

Views on changes to the benefit

- Perspective on how, if at all, the benefits package should be modified to better meet the needs of veterans and their survivors
- Perspective on whether quality of life considerations and lost earnings considerations should be separated during the rating process and rated separately, and how that would likely impact both the rating process and the benefit awarded

Overall assessment of the rating process

- Perspective on the relative difficulty of resolving medical versus legal issues related to claims
- Perspective on changes in changes in achieving satisfactory resolution of various kinds of disability claims over the past several years
- Perspective on expectations of veterans regarding the rating process and their benefit

We will analyze the VSO survey data to determine both typical VSO views of the above topics and the range of such views across VSOs by various characteristics of the VSOs and the service organizations of which they are members. We will tabulate responses to each item and examine commonality and range of responses within topic areas. We will use quantitative statistical techniques such as ANOVA and chi-square tests to determine if responses differ among critical subgroups. We will also use qualitative techniques to identify common themes in narrative responses. We will also examine if responses vary by the sponsoring veterans service organization with which a VSO is affiliated. Finally, we will compare the VSOs' responses with comparable data that is being collected from VA employees who serve as raters.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We request approval to omit the expiration date for the OMB approval from the telephone surveys of service-disabled veterans and their survivors only. The more information presented at the beginning of the survey, the greater the possibility for a respondent to either refuse or become confused.

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

This information collection complies with all of the requirement of the Paperwork Reduction of 1995.