

**SUPPORTING STATEMENT FOR 2900-0376
VA FORM 10-9009, AGENT ORANGE REGISTRY CODE SHEET**

VA is seeking continued OMB approval for this information collection process.

A. JUSTIFICATION

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

The Department of Veterans Affairs (VA), in an on-going effort to maintain an Agent Orange Registry (AOR) developed a reporting format to facilitate the collection of information obtained from the veteran during the Agent Orange registry examination process. Legal authority for this data collection is found under 38 USC 38, Part I, Chapter 5, Section 527.

Public Law 100-687, "Veterans' Judicial Review Act of 1988" required the Secretary to organize and update the information contained in the VA AOR to enable VA to notify Vietnam era veterans who served in the Republic of Vietnam of any increased health risks resulting from exposure to dioxin or other toxic agents.

Also, under Public Law 102-585, "Veterans Health Care Act of 1992, Section 703, the Secretary may provide, upon request, a health examination, consultation, and counseling to a veteran who is eligible for listing or inclusion in any health-related registry administered by the Secretary that is similar to the Persian Gulf War Veterans Health Registry. Accordingly, the VA provides registry examinations to veterans who served in Korea in 1968 or 1969, and/or any U.S. veteran who may have been exposed to dioxin, or other toxic substance in a herbicide or defoliant, during the conduct of, or as a result of, the testing, transporting, or spraying of herbicides, and who requests an Agent Orange Registry examination.

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.

VA employees obtain demographic data from existing records. The examining physician, Agent Orange coordinator/or other designated personnel obtain the remainder of the information during the Agent Orange registry physical examination process. The information obtained from the veteran is entered directly onto an electronic VA Form 10-9009, Agent Orange Registry Code Sheet, via a secured website <http://vaww.registries.aac.va.gov> by VA personnel and transmitted directly to the Austin Automation Agent Orange Registry database. Edits are automatically accomplished at the time of entry.

The registry provides a mechanism to catalogue prominent symptoms, reproductive health, and diagnoses and to communicate with Agent Orange veterans. VA keeps veterans informed on research findings or new compensation policies through periodic newsletters. The voluntary, self-selected nature of this registry makes it valuable for health surveillance; however, it is not designed or intended to be a research tool and therefore, the results cannot be generalized to represent all Agent Orange veterans.

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

SUPPORTING STATEMENT FOR 2900-0376, continued

decision for adopting this means of collection. Also described any consideration of using information technology to reduce burden.

In accordance with the Government Paperwork Elimination Act, VA implemented the electronic submission of these data contained on this form. However, since data is gathered in association with a physical exam, it was determined that publication of the form on the Internet was inappropriate. The information obtained from the veteran is entered directly by VA personnel onto an electronic code sheet via a secured intranet website <http://vaww.registries.aac.va.gov> and transmitted directly to the Austin Automation Agent Orange Registry database. Edits are automatically accomplished at the time of entry. To prevent duplication of data, the website is linked to the National Patient Care Database (NPCD) enabling the Environmental Health Coordinator to populate the code sheet with the needed demographic and service date information.

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.

This interview is needed as the information being collected during the Agent Orange registry examination process is not available from another source.

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.

Collection frequency is based on the self-request by veterans who may have been exposed to the herbicide for the scheduling of physical examinations. VA would not be able to keep veterans who have been exposed to Agent Orange informed on research findings, new compensation policies and provide Congress and its constituents with updated statistical findings if this information was collected less frequently.

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.

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

SUPPORTING STATEMENT FOR 2900-0376, continued

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 December 6, 2006 Vol. 71, Number 234, pages 70847 -70848. We received no comments in response to this notice.

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.

Public comment will be provided through the 60 and 90-day comment period as announced in the Federal Register.

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.

Assurances of confidentiality are contained in 38 U.S.C. 5701 and 7332. Respondents are informed that the information collected will become part of the Consolidated Health Record that complies with the Privacy Act of 1974. These forms are part of the system of records identified as identified as 19VA136 "Patient Medical Record – VA" as set forth in the Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html>.

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.

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

a. Annual burden estimate.

We estimate that 21,000 registry examinations will be conducted annually with 20 minutes required per veteran for a total of 7,000 burden hours.

b. 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 83-I.

This request covers only one form.

SUPPORTING STATEMENT FOR 2900-0376, continued

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. 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 cost to the respondents for completing these forms is estimated at \$105,000 (7,000 burden hours X \$15 per hour). We do not require any additional recordkeeping.

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.
- c. There are no record keeping costs.

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 estimated annual cost to the Federal Government is \$648,631.

Registry Coordinator	(GS 9/5) at \$19.29/hour x 21,000 forms x 7 min. / 60	\$ 47,261
Environmental Physician	Average of \$53.03/hour x 21,000 exams x 30 min. / 60	\$556,815
Coder	(GS 5/5) at \$12.73/hour x 21,000 exams x 10 min. / 60	\$ 44,955
Recurring costs at Austin		\$300,989
<hr/> TOTAL		\$648,631

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

The reduction in the number of respondents and burden hours is a result of fewer individuals requesting this exam. This is considered an adjustment.

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.

There are no plans to publish the results of the information collected.

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

SUPPORTING STATEMENT FOR 2900-0376, continued

VA seeks to minimize the cost to itself of collecting, processing and using the information by not displaying or announcing the expiration date. The survey is conducted during a physical examination and inclusion of the expiration date would place an unnecessary burden on the respondent. The information is available upon request.

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

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.