

**Justification for Regulation on Application for Fisher Houses
and Other Temporary Lodging, VA Forms 10-0408 and 10-0408a
OMB 2900-0630**

A. JUSTIFICATION

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

VA is mandated to establish a program for providing temporary lodging under section 221(a) of the Veterans Benefits and Health Care Act of 2000 (Public Law 106-419). These statutory provisions have been codified at 38 U.S.C. 1708 and are administered by the Veterans Health Administration (VHA) of VA. This program provides temporary lodging by veterans receiving VA medical care or C&P examinations and by family members or other persons accompanying veterans to provide the equivalent of familial support. If the veteran is undergoing extensive treatment or procedures, such as an organ transplant or chemotherapy, eligible persons may be furnished temporary lodging for the duration of the episode of care. Data is collected during the application process to determine eligibility for temporary lodging.

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.

Each VHA facility has publicized their temporary lodging program and the associated application procedures through ambulatory care clinics and through their social workers. Individuals will apply through the VA staff member coordinating the program at that facility. The information provided has helped the VA staff member coordinating the temporary lodging program determine whether the veteran meets the established criteria for lodging. If the veteran meets these criteria, the veteran or person providing familial support will be considered for temporary lodging on a first come, first served basis. Temporary lodging facilities, such as hotels or motels, are not part of the basic benefits package for enrolled veterans. They are provided to veterans meeting the criteria based on availability of local funding as determined by the Director of the healthcare facility. Facilities try to accommodate all eligible veterans. When the facility's temporary lodging beds are filled, the veteran is referred to a social worker for help in locating affordable temporary lodging in the community. In some cases, the veteran is admitted if no lodging services are available. There is no priority system. Temporary lodging services are provided on a first come, first served basis.

To obtain this temporary lodging, a veteran makes application to the person responsible for coordinating the temporary lodging program at the VA healthcare facility of jurisdiction. Certain veterans receiving VA medical care or Compensation and Pension (C&P) examinations and to persons accompanying these veterans who provide the equivalent of familial support are eligible. This lodging may be in:

- a) Non-utilized beds and rooms at a VA healthcare facility (generally referred to as "hoptels"),
- b) Fisher Houses which are facilities available for residential use on a temporary basis that are located at or near a VA healthcare facility, or
- c) Temporary lodging facilities such as hotels or motels.

Justification for 2900-0630, Fisher Houses & Other Temporary Lodging, Continued

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 described any consideration of using information technology to reduce burden.

Application for this housing may be made by letter, electronic means (including telephone, e-mail, or facsimile), or in person at the VA healthcare facility of jurisdiction. This addresses the Terms of Clearance for OMB approved 2900-0630: *In the next submission of this collection to OMB for review, VA shall provide an update concerning the practicality of providing respondents with a fully electronic option for the submission of associated forms.*

To request a VHA Fisher House, VHA medical facilities must submit applications, but only in response to a formal "Call for Applications." Unsolicited applications are not accepted. The formal Call for Applications is issued only when the Fisher House Foundation has sufficient funds to build more Fisher Houses. The facilities that are not selected may apply at the next Call for Applications, *only*. The applications are submitted by facility directors through Veterans Integrated Service Network (VISN) offices to Veterans Affairs Central Office. There is oversight, whereas if the applications and associated forms were submitted electronically, VHA would be inundated.

VA Form 10-0408A will be the standardized application for medical centers seeking VHA Fisher House or temporary lodging for veterans and their families. This application is specifically for a "stay" or temporary residency.

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.

There are no other sources of the information requested. The data requested is:

- a) Date and time of scheduled care,
- b) Type and duration of scheduled care,
- c) Name, gender, and relationship to the veteran of accompanying individual,
- d) Distance, time, and means of travel from the veteran's home to VA healthcare facility,
- e) Circumstances that may affect the time of travel from the veteran's home to VA healthcare facility, and
- f) Requested dates for temporary lodging.

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

There will be no impact on small businesses or other small entities other than possibly the lodging industry to identify vacancies. However, any such effect would be minuscule.

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.

Justification for 2900-0630, Fisher Houses & Other Temporary Lodging, Continued

Without this information, VA would not be able to implement the provisions of the Veterans Benefits and Health Care Act of 2000 regarding the use of Fisher Houses and other temporary lodging.

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 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 September 19, 2008 (Volume 73, Number 183, Page 54454). 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.

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices. We have not consulted further with anyone outside the agency because the type of information collected is kept to an absolute minimum and there is no prescribed format. This information is available only from the veteran applying for temporary lodging. The frequency of collection is dependent upon how often the veteran applies for lodging.

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, which complies with the Privacy Act of 1974. These forms are part of the system of records identified as

Justification for 2900-0630, Fisher Houses & Other Temporary Lodging, Continued

24VA136 "Patient Medical Record – VA" as set forth in the 2003 Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/2003.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. Estimated total annual reporting and recordkeeping burden is 83,333 hours.

We estimated that each of the 163 VHA facilities would have approximately 1500 veterans who would meet criteria for temporary lodging. We rounded that figure up to a total of 250,000 respondents. Each eligible veteran is expected to need lodging twice per year. The veteran must apply for lodging each time lodging is required as this is not a benefit with automatic indefinite enrollment. Circumstances change, so the veteran must reestablish eligibility each time lodging is needed. The VA staff member coordinating the temporary lodging program will determine each time whether the veteran meets the criteria for lodging. However, most facilities will maintain a spreadsheet of veterans who have been lodged so that they have the basic demographic information on file should the veteran require lodging in the future. At that point, an update will be all that is needed.

250,000 respondents x 2 responses annually x 10 minutes / 60 = 83,333 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.

VA Form 10-0408a, VHA Fisher House or Other Temporary Lodging Application and VA Form 10-0408, VHA Fisher House Application, may be used.

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 providing the data and the associated recordkeeping is \$1,249,995 (83,333 x \$15).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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.

Justification for 2900-0630, Fisher Houses & Other Temporary Lodging, Continued

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.

Federal Government Processing/Analyzing Costs						
	Salary	Responses	Equals	Min.	/ by 60	Total
GS 5/5 clerk	\$16.14	500,000	\$8,070,000	20	60	\$2,690,000
GS 11/5 social worker	\$29.59	500,000	\$14,795,000	10	60	\$2,465,833.30
Participating facilities	163	\$280	to print brochures			\$45,640
Postage	35,000	\$0.42				\$14,700
TOTAL						\$5,216,173.30

15. Explain the reason for any changes reported in Items 13 or 14 on OMB Form 83-I.

There is no change in burden.

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.

VA seeks an exemption that waives the displaying of the expiration date on this form. Existing stock may be used since the form has not changed, and it is possible for a respondent using an outdated form to become confused when they see a form showing an expired OMB approval. Therefore, VA seeks to minimize its cost of collecting, processing and using the information by not displaying the expiration date.

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.