

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

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.

The Department of Labor's Homeless Veterans' Reintegration Program (HVRP) in the Veterans Employment and Training Service (VETS) provides competitive grants to community-based organizations with the goal of increasing the workforce participation of homeless veterans through training, placement and retention services that also link to other social support services in the community. HVRP grantees work in partnership with other local resources and Federal programs, including the VETS Disabled Veterans' Outreach Program (DVOP) and the Local Veterans' Employment Representative (LVER) as well as Veterans Administration programs and services. Using HVRP grant funds, grantees provide outreach services including coordination with other DOL and Federal, State and local programs; intake and job assessment services; job training and skills enhancement services; job placement; job counseling; and other support services as well as referrals, as necessary, to other needed services in the community, such as housing, substance abuse counseling, and health or mental health services (among others), to support and reinforce the employment services being directly provided under the grants.

In 2007 DOL commissioned an independent study of the HVRP to examine how well the program is accomplishing its mission and meeting its goals and to provide data to inform future programmatic decisions among HVRP staff. This study was prompted by an OMB PART assessment that found that no independent studies had been completed on the effectiveness and efficiency of the HVRP. The data collection as part of this current study of the HVRP is necessary to collect the critical data for an effectiveness assessment of the program. Specifically, this data collection will collect data from urban and non-urban HVRP grantees (including those classified as "new grantees") to evaluate and assess the impacts of DOL internal programmatic changes and grantee use of DOL resources on grantee performance, processes and key outcomes. Data collection also will collect information from grantees relative to grantee and target group (homeless veterans) characteristics, organization, and processes to analyze these factors against performance and outcomes. These data ultimately will help VETS to identify improvements to the program and/or the characteristics of grantees and service recipients that most affect performance. These data also will allow VETS to meet OMB PART recommendations.

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.

This data collection is a new collection. However, HVRP grantees already are required as part of their grant to provide monthly performance information to VETS on services provided and key employment placement, retention and wage information into the automated VETS Operations and Programs and Activity Report (VOPAR) system. The data collected in VOPAR are used to monitor grantee performance to ensure adherence to identified objectives and targets and compliance with HVRP rules as defined in the grant agreements. The data to be collected as part of this new survey of HVRP grantees will be more detailed in order to understand *how* and *why* certain outcomes are being achieved by grantees. The data will be used by VETS and its independent evaluator, ICF International, to evaluate grantee performance, processes and outcomes as part of the ongoing HVRP Effectiveness Study.

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 burdens.

The collection of information will utilize a web-based survey design. Email addresses will be obtained for all survey participants through their organizations. Survey participants will receive a personalized email from the VETS regional director or Grant Officer Technical Representative (GOTR) that is responsible for the individual grantees. The email from the GOTR will include contact information for the independent evaluator, ICF International, and will provide the grantee with a hyperlink to the survey as well as a username and password. This username and password will allow participants to log in and out so that they can complete the survey over several sessions if necessary.

Alternatively, participants will be able to complete the survey using a paper-based version if they prefer such a format. A paper copy of the survey will be mailed to participants requesting a paper based format and will include a postage paid return envelope for submission.

The use of an online survey should reduce burden for participants by allowing for the use of skip logic within the survey for particular survey questions. Skip logic allows for the survey to be designed in such a way that, based upon prior answers provided by survey participants, further irrelevant questions will not be asked. This will allow survey participants to only read and answer survey questions relevant to them, reducing the time burden. The online surveys also are divided into four separate instruments to allow for different personnel within the organization to complete different sections, again reducing the overall burden on any one individual responder. (See Question 12.)

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.

A search of the published literature indicates that the survey does not duplicate any similar information that is known to be already available.

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

Some organizations in the sample will be small businesses. We have divided the survey questions up to be directed at individuals in specific roles (see Question 12) within the organization who will have ready access to the information in the survey. This process should serve to both minimize the burden on any one individual as well as on any one organization.

6. Describe the consequence 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.

This data collection will be conducted once for each current HVRP grantee during this study. If this data collection is not conducted, the HVRP effectiveness study will be severely undermined, as there would be no detailed performance, processes, organizational and descriptive data from the universe of urban and non-urban grantees receiving public funds as grants under the program. These data are essential to understanding of the effects of programmatic changes and access to and use of DOL resources on the outcomes and to identifying the characteristics of most and least successful grantees and homeless veteran

participants in order to continually improve the program and its grantee selection process to maximize the benefits to homeless veterans.

There are no technical or legal obstacles to reducing burden. The reporting burden for grantees for this survey has been reduced to the greatest extent possible. This is the first time these data have been collected from HVRP grantees.

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

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to 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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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**
- **requiring respondents to submit proprietary trade secret, 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.**

Grantees will be asked to return the survey within 2 weeks. Questions in the survey will be directed to the specific individuals who have ready access to this information, and therefore the two week timeframe should not create an unreasonable burden. After two weeks, the independent evaluator will send at most 2 rounds of follow-up emails to each grantee's director to request participation and to answer any technical questions relative to the hyperlink or accessing/submitted the survey responses.

8. If applicable, provide a copy and identify the data 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.

The Department published an initial Federal Register Notice on August 15, 2008 (73 FR 47981) notifying the public of its intent to pursue an information collection through a survey of HVRP urban and non-urban grantees. The Department received two responses to the Notice, both from current HVRP grantees. Neither of the commenters expressed opposition to the data collection process or survey, and no changes were requested to the data collection process of the survey. One commenter requested additional information on the survey process. The Department will distribute this information directly to HVRP grantees as part of the survey distribution process in advance of data collection. The other commenter expressed interest in participating in the study and requested specific information on how to participate. The Department will provide this specific information as part of the overall survey implementation and distribution process. As a result of the two comments, the Department did not institute any changes to the survey instrumentation or the planned data collection process.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

To clarify survey instructions and questions, a cognitive lab of the survey was conducted with Mr. Stanley Seidel, Maryland's Director of Veterans' Employment and Training Service. Mr. Seidel has extensive experience working with grantees and was selected for this cognitive lab based on his ability to understand and interpret the survey from a grantee's perspective.

The purpose of a cognitive lab was to ensure that survey respondents can understand the survey instructions, questions, and answer choices. It also aids in verifying that the survey contains the appropriate questions and answer choices. A cognitive lab is conducted by having the participant read through each question and its applicable answer choices, then think aloud as to how he or she would respond to the question. A moderator records any difficulties the participant has with the question as well as any concerns or comments about the instructions, questions, or answer choices. This information is then used to make revisions to the survey. Mr. Seidel completed a cognitive lab of the survey on December 13, 2007. His comments were utilized in revising the survey to reduce the time burden upon participants by removing inappropriate questions and providing more accurate answer choices.

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

No payment or gift will be provided to survey respondents. Survey respondents are current grantees of the HVRP.

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

Confidentiality will not be assured in this survey. Participants will receive the following statement regarding privacy of information: "Responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. We will not provide information that identifies you or your district to anyone outside the study team, except as required by law."

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.

No questions of this nature are included on the survey.

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 for 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.**

Surveys will only be administered once to each organization; however, there will be four surveys for each organization, as the survey questions have been divided up for individuals in each of the following job categories: Program Director, Financial Director, Case Manager, and Employment Services Director. This design was chosen to reduce the burden on individual respondents by directing questions to specific individuals who will have ready access to information necessary to complete the surveys. These four labor categories were selected based on consultation with expert consultants who work with HVRP grantees and other community-based organizations serving homeless veterans as the four labor categories best suited to answer the questions and most involved in the operations and services of the grantee organizations.

VETS expects to receive a 40-65% response rate from among the entire grantee population being surveyed (N=81 grantee organizations or a possible total of 324 individual respondents), for a total of 130-211 anticipated respondents. No survey of this population has been completed in the past, but other voluntary surveys of grantees have achieved a 60-65% response rate (private foundations, however, not Federal government grantees). VETS maintains a close relationship with its grantees and regularly seeks informal feedback on HVRP, and we may therefore achieve a higher than expected response rate.

In order to pilot test the surveys and determine the hour burden for each survey, a sample of six grantees was solicited to provide responses for a pre-testing of each of the four surveys. Each grantee provided contact information for the Program Director, Financial Director, Case Manager, and Employment Services Director. These participants were sent instructions and website links to the appropriate online survey, and were given approximately two weeks to complete the survey. At the end of each survey, participants were asked to report the total number of minutes needed to complete the survey. These pilot test results indicate that respondents understood the survey questions and were able to navigate the web-based application through which the survey was administered.

Annual hour burdens were created by averaging this number for each of the surveys, with the total annual hour burden per organization being a sum of all hour burdens. Based upon the sample of respondents, it is estimated that the four surveys administered in this data collection will have an annual hour burden of 5.0 hours per grantee. The total hour burden for all respondents across all grantees is estimated to be 405 hours.

The hours per survey form and the estimated costs are shown in the tables below. The total estimated cost per grantee for time spent completing this survey is \$140.11 based on approximate hourly rates for each respondent category.

| Survey Form | Annual Hour Burden (per grantee) | Total Hour Burden (all grantees*) |
|------------------------------|----------------------------------|-----------------------------------|
| Program Director | 1.7 | 137.7 |
| Employment Services Director | 1.4 | 113.4 |
| Case Manager | 1.4 | 113.4 |
| Financial Director | 0.5 | 40.5 |
| Total | 5.0 | 405 |

*81 grantees will be surveyed.

| Survey Form | Annual Hour Burden | Estimated Hourly Rate* | Total Estimated Cost (per grantee) |
|------------------------------|--------------------|------------------------|------------------------------------|
| Program Director | 1.7 | \$29.69 | \$50.47 |
| Employment Services Director | 1.4 | \$28.12 | \$39.37 |
| Case Manager | 1.4 | \$23.63 | \$33.08 |
| Financial Director | 0.5 | \$34.37 | \$17.19 |
| Total | 5.0 | N/A | \$140.11 |

*estimated hourly rate is based on Occupational Employment Survey data (2006) and our experience working with employees in grantee organizations such as these. The base hourly rates have been increased by 30% to account for grantee costs in addition to hourly pay (i.e., benefits and overhead costs).

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).**

- **The cost estimate should be split into two components: (a) a total capital and start-up 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 purchasing or 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.**
- **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.**

The cost burden for respondents will be limited to the cost hour burden as described in Question 12. HVRP grantees will provide responses using a Web-based form so there are no capital costs associated with mailing the completed survey instrument. Respondents also may email the completed survey instrument to the independent evaluator or to VETS. All respondents currently have access to the Internet as they are currently required by the terms of their HVRP grants to provide monthly performance data to VETS using the automated VOPAR system.

Respondents will not need to purchase any equipment or software to respond to this data collection request.

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.

Costs of data collection instrument development, the oversight of the data collection process, and data analysis already have been negotiated as part of the contract between DOL and the VETS independent evaluator, ICF International, that will provide these services as part of the completion of the overall Effectiveness Study for DOL. The total cost of this study under a firm fixed price contract is \$384,155.00. In addition, the combined VETS, CPPR and CFBCI staff and additional contractors' time in support of this study is estimated at \$82,000.

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

This is a new collection for a one-time study on the Homeless Veterans Reintegration Program.

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.

Draft and final reports will present data about: the impact of programmatic changes introduced by VETS; The influence of DVOP specialists and LVER staff assistance on grantee performance; The qualifications/experience and knowledge/skills of grantees; and The characteristics of those homeless veteran job seekers who do not appear to have had successful employment outcomes following their

interaction with the HVRP. Data analysis for these surveys will involve conducting content analysis of qualitative data, providing summary statistics of the survey variables and conducting correlations of grantee demographics, organizational structures, practices, policies, qualifications/experience of staff, and common measures data (data from a source outside of this survey). The project associated with this collection of information began in September 2007 and is currently scheduled to end in April 2009 dependent on the timeframe for data collection. Key project dates include:

- Collection of Information through Survey: January-February 2009
- Draft and Final Reports: March-April 2009
- Presentation of Findings to VETS: April 2009

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.

N/A

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

N/A