SUPPORTING STATEMENT

For

Paperwork Reduction Act Submission

Evaluation of the Department of Veterans Affairs' Vocational Rehabilitation and Employment Program

April 28, 2009

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Office of Policy and Planning

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify 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.

In 1943, Congress passed a law establishing a vocational rehabilitation program for the veterans of World War II.[1] During World War II, Congress, in appreciation for the valor and sacrifice shown by the men and women in the armed forces, passed legislation providing a number of new benefits to veterans, known as the G.I. Bill (officially the Servicemen's Readjustment Act of 1944, Public Law 78-345). The new benefits and the extent to which they were used by World War II veterans profoundly changed American life, geography, and culture: university enrollments grew to record numbers, and more families could afford their own homes, live in the suburbs, and call themselves "middle class."

Between the end of the Korean War and the beginning of the Vietnam era, Congress passed a law that authorized vocational rehabilitation benefits to veterans who served in peacetime but with more restrictive criteria.[2] A few years later, Congress broadened the criteria to expand the objectives of vocational rehabilitation from being able to obtain employment to maintaining employment over time.[3] Additionally, Congress again reinforced intensive outreach and the development of plans tailored to each veteran.[4]

The vocational rehabilitation function was part of various administrative departments over time. For example, at one time the function was part of VBA's Veterans Services Division, which eventually disappeared in the 1990s. At that point, the Compensation and Pension (C&P) service of VBA took responsibility for the vocational rehabilitation (VR) function. It was also part of VBA's Education Service at one time as well. Undergoing various name changes and organizational connections in 1990 and 1993, vocational rehabilitation was finally named the Vocational Rehabilitation and Employment (VR&E) Program in 1999. As such, it is one of five main business lines within VBA: Compensation and Pension, Education, Loan Guaranty, Vocational Rehabilitation and Employment, and Insurance.

In FY 2007, 51,467 veterans received benefits from VR&E,[5] the vast majority of them (92 percent) receiving long-term education and training. For example, 44,841 (87 percent) received undergraduate education and 2,287 (4 percent) received graduate school education. Another 734 (1.4 percent) received extended evaluation/independent living services. The remainder

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[1] Public Law 78-16.

[2] Public Law 87-815

[3] Public Law 93-508.

[4] Public Law 96-466.

[5] 2007 VBA Annual Benefits Report.

received other employment services or vocational training. Veterans availing themselves of VR&E services also can get employment planning, medical and dental care, and other supportive services.

Over the past several decades, VR&E has been subject to a number of reviews, reports, evaluations, and audits by different governmental bodies in order to improve the delivery of services to veterans with disabilities. These reviews have included: the VR&E Task Force in 2004, the Veterans' Disability Benefits Commission in 2007, and the Commission on Care for America's Returning Wounded Warriors, also in 2007.[6]

The majority of recommendations found in the 2004 VR&E Task Force Report in particular have been adopted by VR&E. Among these was the recommendation to offer VR&E services in the form of five different tracks:

- Re-Employment, for veterans who are returning to work with an employer they had before their military duty.
- Rapid access employment, for those who wish to begin employment immediately and who have the necessary skills and abilities to be competitive in the job market.
- Self-employment, for those who want to work for themselves for various reasons.
- Employment through long-term services, for those who need specialized training and/or education.
- Independent living, for those veterans who may not be able to work right away, and who need additional services in order to live independently.

These five tracks have been implemented.

In 2006, OMB reviewed VR&E using its Program Assessment Rating Tool (PART). Although this review occurred after the 2004 Task Force report was published, the five tracks recommended by the Task Force were just beginning to be implemented. The PART review, then, is not a review of the five tracks.

OMB gave the VR&E program an overall assessment of Adequate, and listed several concerns:

- Redundancy with other programs: OMB thought that VR&E services were not necessarily designed so as to not be redundant with other federal, state, and local VR programs.
- VR&E has a limited number of specific annual and long-term performance measures that focus on outcomes.
- Budget requests are not tied to specific annual and long-term outcomes.
- VR&E has not had sufficient independent evaluations performed to indicate that the program is effective and achieving its goals.

A specific goal of the evaluation for which this data request is being submitted is to address these concerns on the part of OMB.

[6] Also known as the "Dole-Shalala Commission."

Specifically, the evaluation has two overarching purposes:

- To describe the VR&E program as it is currently implemented, including changes that have occurred since the publication of the VR&E Task Force report. The description will provide information on the current participants, current staff composition and complement, and the program's future needs.
- To determine the extent to which the program is effective in meeting its outcomes to rehabilitate veterans with disabilities and assist them in achieving specific employment or independent living outcomes.

The evaluation will support VA's fulfillment of the requirements of P.L. 103-62, the Government Performance and Results Act of 1993; and Title 38, §527, Evaluation and Data Collection. A copy of the latter is provided in a separate document.

This request for approval focuses on the data that are needed to conduct the evaluation as described in the above referenced regulations.

We are seeking approval for the following information collections:

- Survey of veterans with disabilities who have participated in the VR&E program (including current participants, and participants who have completed, withdrawn, and interrupted the program). (See the **Participants Questionnaire** document for a copy of this questionnaire)
- Survey of veterans who applied for VR&E and were found eligible/entitled but did not pursue through development of a rehabilitation plan and those who applied but did not pursue through an entitlement decision. (See the **Non-Participants Questionnaire** document for a copy of this questionnaire)
- Survey of veterans who are theoretically eligible for participation in VR&E, but have not applied for VR&E benefits. (See also the **Non-Participants Questionnaire** document)
- Survey of VR&E contract counselors who directly provide VR&E services to eligible veterans. (See the **Contract Counselors Questionnaire** document for a copy of this questionnaire)
- Interviews conducted with dependents of veterans who participated in VR&E. (See the **Dependent Interview Protocol** document for a copy of the protocol)

These data collections are necessary for the VA Office of Policy and Planning to:

- Conduct an outcomes study as required by 38 U.S.C. §527
- Provide a comprehensive descriptive analysis of the population of veterans with disabilities, including VR&E applicants and non-applicants, and reasons for participation and non-participation in the program.
- Provide a descriptive analysis of the VR&E program, including how "success" is defined for different types of participants.

- Examine the manner in which veterans participate in other VA and non-VA programs such as Veterans Health Administration (VHA), Department of Labor (DoL), and Veterans Service Organizations (VSOs).
- Examine the manner in which VR&E coordinates with other VA and non-VA entities such as VHA, DoL, and VSOs.
- Describe the characteristics of VR&E contract counselors who provide service to veterans.
- Perform a broad return-on-investment (ROI) analysis of the VR&E program that includes benefits to veterans and to society, including post-rehabilitation income, among other factors.
- Estimate the impact of the Post 9/11 Veterans Educational Assistance Act[7] and other factors on VR&E caseload mix and program participation in the future.

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 current collection.

VA's Office of Policy and Planning, the Vocational Rehabilitation and Employment program (VR&E), and the Veterans Benefits Administration (VBA) will use the information to:

1. Assess the adequacy and effectiveness of the current VR&E program in terms of the five tracks of services in which a veteran with disabilities may be placed.
2. Identify additional performance measures that can be used to comply with benchmarks put in place by VA.
3. Forecast the VR&E caseload and mix of needs for the next five to ten years.
4. Suggest any modifications to the organizational structure, the service delivery infrastructure, and the staff to better meet the employment and independent living needs of veterans with a disability.
5. Address the objectives and the research questions of the evaluation.

This is a request for a new, one-time only, information collection. No prior collection has been obtained.

A matrix providing a crosswalk between the research questions posed by VA, and the questionnaire items that seek to address those research questions is provided in the **Matrix of Research Questions and Questionnaire Items** document.

[7] Also called "The New GI Bill".

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.

Two modes for survey administration (paper-based and web-based versions) will be available to respondents to complete the VR&E Participant and VR&E Non-Participant surveys All participants will be sent a paper survey which they may fill out and return via a pre-paid postage (BRE) envelope. Respondents will also be given the option to complete the survey via the Web. The survey cover letter will contain information to respondents for completing the survey using either mode. (See the **Participants Cover Letters, Instructions and Reminder Postcards**, and **Non-Participant Cover Letters, Instructions and Reminder Postcards** documents for copies of these materials)

The basis for providing the option for survey completion via the World Wide Web stems from the experience of EconSys and ICF whereby dozens of large-scale surveys using Web technology have been successfully completed with military and veteran populations.

Hosting surveys on the Web also permits the greater use of assistive technologies (AT), an important consideration given the population to be surveyed. This reduction of respondent burden through reliance on technology meets the spirit of the Government Paperwork Elimination Act (GPEA).

In addition to collecting data from veterans about their participation (or non-participation) in the VR&E program, a web-based survey will be administered to the universe of VA's contract counselors to provide information on the VR&E's five tracks and other processes relating to VR&E services. Approximately 1,200 contract counselors will receive an email to inform them of the survey and to provide access information to the online instrument. A 70% response rate is anticipated from these counselors based on other survey work conducted with VA employees. A similar survey will be conducted of VR&E staff but because they are Federal employees and exempt from the PRA, this survey is not included in this request.

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 three previous studies/evaluations relevant to the current effort.

An evaluation of the VR&E program was conducted in 1979 by the staff at VA's then Office of Planning and Program Evaluation. It examined whether VR&E was achieving its stated goals. The data from this study is no longer relevant because of its age and because of the conceptual, structural, and organizational changes since that time.

Another evaluation of the VR&E program was conducted by the VA then Office of Program Evaluation in 1990. This study used a cost-benefit analysis to examine the efficiency and effectiveness of the program. The data from this evaluation cannot be used because of its age and the limits to its scope and analytical methods.

An outcome-based assessment of the VR&E Chapter 31 program was conducted in 2005. It used individual earnings records from an 18-year period to examine the impact of the VR&E program on earnings of veterans with disabilities. While methodologically rigorous, the data from this study cannot be used to fully address the objectives and research questions posed in this evaluation for which the collection request is being made.

Finally, in 2007, the Veterans Employability Research Survey (VERS) examined employability outcomes among participants of the VR&E Program. This telephone survey was conducted with 5,000 applicants of the VR&E program at various stages of program participation from drop out and temporary interruption of the program to completion of at least one or all phases of the program. Veterans who were eligible for VR&E but who did not apply for the program were not studied.

None of these sources contains the information required by the VA Office of Policy and Planning to conduct the evaluation. However, in order to minimize response burden, this evaluation will use much administrative data available and maintained by VBA.

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.

VA will not be able to fulfill its congressional mandate to evaluate programs if this collection is not conducted. More importantly, VA will not be able to serve veterans with disabilities in ways that are desired by veterans. Ultimately, this will result in a serious disservice to the men and women who have sacrificed so much for this country.

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. Part 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 Federal Register (FR) notice was published on page 6695 on February 10, 2009. At the close of the comment period on April 13, 2009, no comments were received.

8-Part 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.

Consultations with representatives within and outside of the Department of Veterans Affairs have begun on data sources. Within VA, discussions have been held on access to CWINRS data, the Benefits Delivery Network (BDN) Chapter 31 File, and the BDN C&P Master File. Among agencies outside of VA, initial consultations have begun with the following data providers on access and transmission of data from:

- Department of Labor (DOL) VETS Staff
- Disabled Veterans Outreach Program (DVOP) Staff
- Local Veterans Employment Representative (LVER) Staff
- University of Richmond (David Dean, Ph.D.) for Chapter 31 Master Records for subsistence allowance awards and SSA data on annual earnings
- Department of Education for RSA-911 data

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 statue, regulation, or agency policy.

An assurance of strict confidentiality is made in the introductory letter that respondents receive with the survey as well as in the written prologue appearing at the beginning of each survey. 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).

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 either in the Participant or Non-Participant or in the structured interview instruments developed for dependents of veterans. Information provided to all survey participants will inform respondents of the purpose of the survey, the use to which the information will be put, and the manner in which the information will be reported.

Furthermore, the survey cover letter and the introduction to each of the questionnaires (i.e., the questionnaire form itself), stresses the voluntary nature of the survey. Respondents may omit responses to any survey question they so choose, to include the entire survey. Respondents are also informed that their responses will be kept confidential and anonymous.

Respondents to the Participant and Non-Participant surveys are instructed that their responses will not affect their eligibility for VR&E or his or her family members for any of their VA benefits.

Participants in the structured interviews will be instructed in the purpose of data collection in this evaluation. Informed consent will be obtained from each participant prior to the interviews.

The study report will not include any information that could identify respondents. The report will include statistical data and other aggregated data for evaluating VA's Vocational Rehabilitation and Employment Program.

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

The total response burden for interviews and surveys is provided in the exhibit below.

Estimated Respondent Burden for Data Collection Activities			
Data Collection Activity	**Estimated No. Respondents**	**Average Burden Hours Per Respondent**	**Burden Hours**
Interviews of Dependents of Veterans	100	30 minutes	50
Survey of VR&E Veteran Participants[8]	13,770	25 minutes	5,738
Survey of VR&E Veteran Non-Participants[9]	9,720	25 minutes	4,050
VR&E Contract Counselors	840	20 minutes	280
TOTALS	**25,240**		**10,118**

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

The burden estimate for participant and non-participant survey respondents is based on achieving a response rate of 50% of those contacted for the survey, or 23,490 individuals (for survey of participants and non-participants). The estimate of time needed to complete the survey is 25 minutes.

The burden estimate for VR&E contract counselors is based on achieving a response rate of 70%. The estimate of time required to complete the survey is 20 minutes.

The calculation of the total response burden and the cost to the respondent for the interviews and the survey is provided in the exhibit below.

Estimated Total Cost to Respondents				
Respondent Type	**Median Annual Salary**	**Hourly Rate**	**Total Hours**	**Total Cost**
Dependents (Interviews)	$31,408	$15.10[10]	50	$755.00

[8] Surveys mailed to 27,540 Veteran Participants for an expected response rate of 50%.

[9] Surveys mailed to 19,440 Veteran Non-Participants for an expected response rate of 50%.

Respondents (Survey)	$31,408	$15.10[11]	9,788	$147,798.80
VR&E Contract Counselors	$32,469	$15.61[12]	280	$4,228.00
Total			**10,118**	**$152,781.80**

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 dependent interviewee, 20 minutes per contract counselor, and 25 minutes per participant/non-participant respondent).

c. There are no anticipated capital start-up cost components or requests to provide information.

[10] Source: Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May, 2007, at: http://www.bls.gov/oes/2007/may/oes_nat.htm#b00-0000, accessed on April 24, 2009.

[11] Source: Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May, 2007, at: http://www.bls.gov/oes/2007/may/oes_nat.htm#b00-0000, accessed on April 24, 2009.

[12] Source: Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May, 2007, for Rehabilitation Counselors at: http://www.bls.gov/oes/2007/may/oes211015.htm, accessed on April 24, 2009.

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 $1,263,507. The exhibit below presents the labor and contracting costs for conducting the surveys. Operational costs have been outsourced to the contractor, EconSys/ICF, and are included in the contractor's total cost.

Estimated Cost to the Federal Government		
Cost Item	**Hours**	**Cost**
VACO-Labor	600	$34,584
Contractor		1,228,923
Total		**0**

The VA Labor cost was estimated using a composite average salary and benefits figure of $57.64 per hour. It is estimated that the amount paid to the contractor, EconSys/ICF for the survey of veterans and the interviews will be $1,228,923. These costs include development of the instruments, development of the sampling plan, review of the instrument, location of respondents, programming of the questionnaire for Web administration, questionnaire pretest, interviewing, validation, data processing, providing a clean data file, project management and analysis, and results reporting.

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

There are no changes. The survey and interview protocol discussed in this supporting statement is a new one-time data collection.

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 major activities and project timeline, updated on December 12, 2008, are provided below. The exhibit tabularizes the activities, deliverables, and the timeline.

Tasks		Months After Contract Award (2008: October–December; 2009: January–December; 2010: January–September)
1: Initialize Study.		
1.1	Meeting Summary	10/16/08
2: Analysis Plan.		
2.1	Draft Analysis Plan	1/14/09
2.2	Revised Analysis Plan	2/4/09
3: Detailed Work Plan and Gantt Chart.		
3.1	Meeting Summary	11/12/00
3.2	Draft Gantt Chart	11/12/08
3.3	Draft Work Plan	11/12/08
3.4	Revised Work Plan	12/1/08
3.5	Revised Gantt Chart	12/1/08
4: Conduct Literature Review.		
4.1	Draft Literature Review	3/30/09
4.2	Revised Literature Review	4/27/09
5: Stakeholder Consultations.		
5.1	Draft consultation goals & major topic areas	11/26/08
5.2	Revised consultation goals & major topic	12/10/08
5.3	Meeting summaries	3/18/09
6: Develop Data Collection Instruments.		
6.1	Draft data collection instruments	2/16/09
6.11	Draft Survey of Counselors instrument	1/16/09
6.12	Draft State Program Inventory instrument	1/16/09
6.13	Submit IRB package for review	1/30/09
6.14	Submit IRB package (if necessary)	2/8/09
6.15	Submit Draft Survey of Participants & Non-Participants instruments to VA for review (Draft 1)	1/9/09

Chart

Figure 1. GANTT Chart (continued)

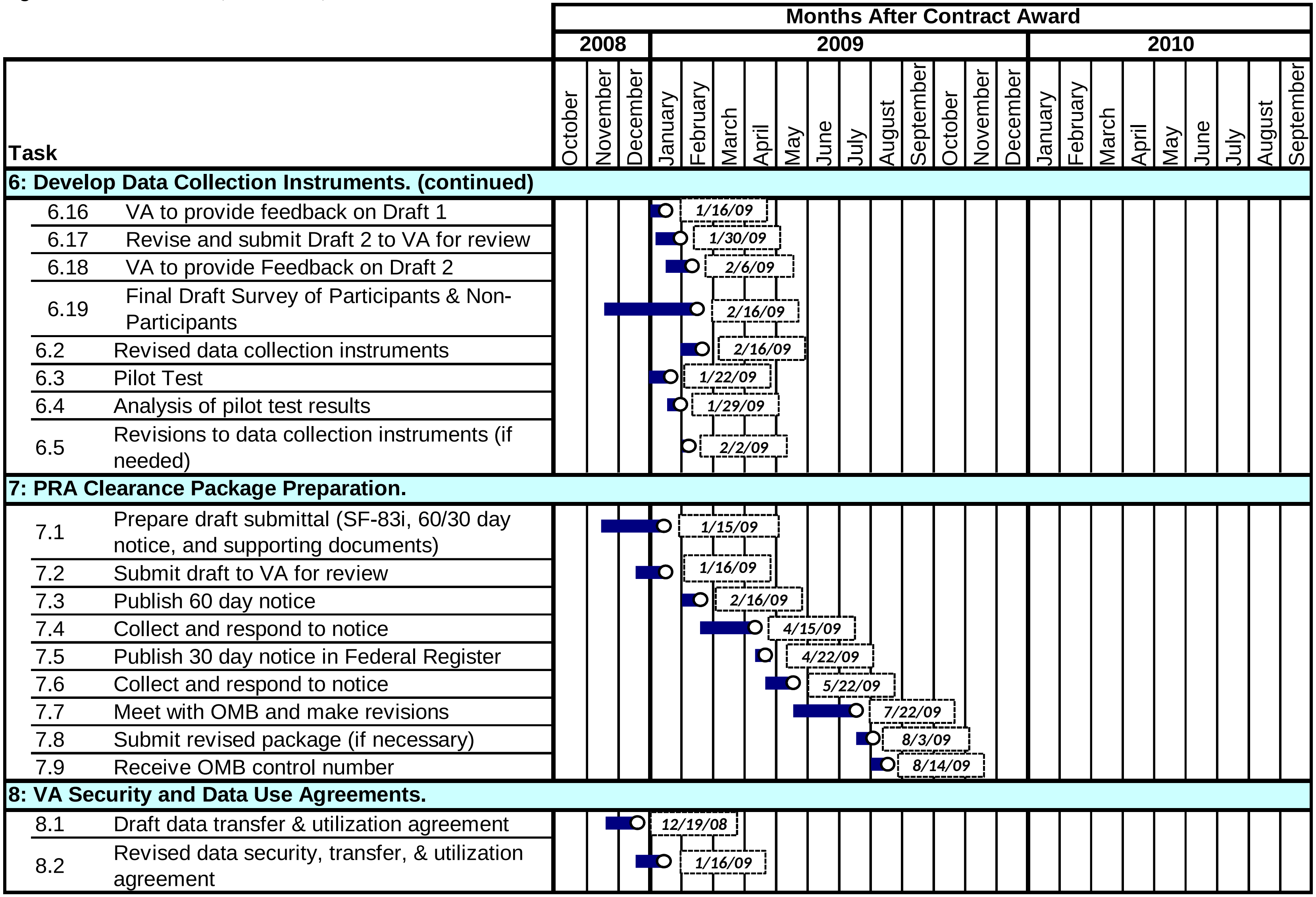
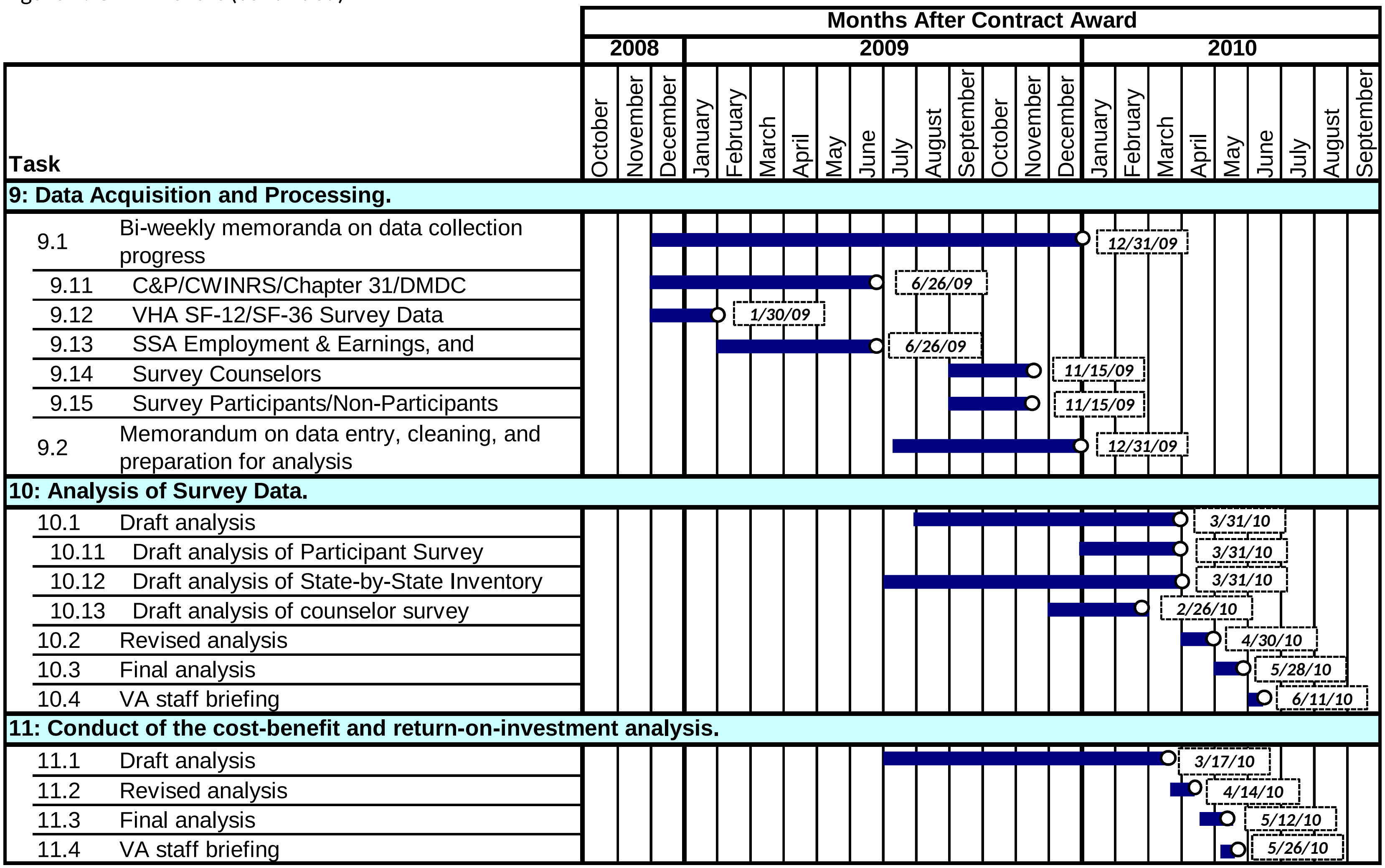


Figure 1. GANTT Chart (continued)



Months After Contract Award: 2008 (October–December), 2009 (January–December), 2010 (January–September)

	Task	
12: Prepare the final report.		
12.1	Outline of the proposed report	2/5/10
12.2	Draft report	6/23/10
12.21	Draft analysis of Program Population	3/12/10
12.22	Draft analysis of Program Success	6/23/10
12.23	Draft Alternative Outcome Measures	6/23/10
12.24	Draft analysis of Impact of New Education Program	4/16/10
12.3	Revised report	7/21/10
12.4	Final report	8/18/10
12.5	Revisions, if required	9/1/10
13: Project Completion.		
13.1	Final reports: 2 electronic and 20 paper copies	9/29/10
13.2	2 (two) Camera-ready copies of report (one blcak and white, and one color)	9/29/10
13.3	10 (ten) CDs with report in PDF format	9/29/10
13.4	2 (two) CDs with 2 (two) PDF versions of the report that are Web-ready and key-word searchable	9/29/10
13.5	Return all VA-supplied reference materials and contractor's working papers	9/29/10
13.6	Draft slides, notes, & other presentation materials	8/28/10
13.7	Brief Assistant Secretary for Policy and Planning	9/29/10
13.8	Final slides, notes and other presentation materials	9/8/10
13.9	Strategic Management Council Briefing	TBD
14: Monthly Reporting.		
14.1	Monthly due the 5th workday of every month	November 2008 – September 2010

A description of the main types of analysis planned is provided in the paragraphs below. A more detailed description is provided in the Analysis Plan, provided in the Analysis Plan document.

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 are not seeking such approval.

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.