

Supporting Statement

Information Collection for

**The National Survey of Veterans, Active Duty Service
Members, Activated National Guard and Reserve
Members, Family Members and Survivors (NSV)**

Part A

July 24, 2009

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Supporting Statement A - Justification

The National Survey of Veterans, Active Duty Service Members, Activated National Guard and Reserve Members, Family Members and Survivors (NSV)

INTRODUCTION

The Department of Veterans Affairs (VA) strives to provide high-quality, prompt, and seamless service to the Nation's more than 20 million Veterans and to their families and survivors. To achieve this mission, VA needs information that will help it evaluate programs for today's Veterans and plan programs for tomorrow's Veterans. VA also needs to know how aware their stakeholders are of the benefits and services currently offered by VA. The National Survey of Veterans, Active Duty Service Members, Activated National Guard and Reserve Members, Family Members and Survivors (NSV) is a key component in satisfying these VA information needs.

Background

The NSV is of great importance to VA because it is often the only source of information on Veterans who are not currently using VA benefits and services. The NSV, intended for administration from October 9, 2009 until February 26, 2010, is designed to help VA improve services for beneficiaries and their families. It will collect information that is not available in VA administrative files.

For this most recent requirement, the scope of the survey has been expanded to address the requirements of P.L. 108-454, Section 805, to assess awareness of VA benefits and services among the following populations: Veterans, active duty service members, demobilized National Guard and Reserve members previously activated under Title 10, and spouses and survivors of Veterans. The NSV provides VA, Congress, stakeholders, and the public more accurate descriptions and assessments of the characteristics of the Veteran population to evaluate existing programs and policies, to establish baseline measures before planning and implementing new programs and policies, and to monitor progress of programs and policies and their impacts on the population. The NSV will provide information to support VA policy, planning, and quality improvement decisions.

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.**

VA is responsible for providing an array of assistance to more than 20 million Veterans. As such, one of VA's many goals is to monitor and improve Veteran health and well-being. Under Section 527, Title 38 U.S. Code, the Secretary of VA is authorized to gather data for the purposes of evaluating programs. The NSV will address the requirements of P.L. 108-454, section 805, to assess awareness of Veterans' benefits and services.

Because of the infrequent administration of the NSV, the data from any single administration are the only source of information on Veterans who are not currently receiving benefits or services from the VA. The NSV is currently the only tool for reaching this population, and the NSV is the only existing tool that will allow for direct comparisons between Veterans using VA services and those who are not. The NSV is also the only existing tool that can evaluate VA outreach efforts and assess benefit awareness among Veterans. Since the data from the NSV are so important, and because the NSV is conducted infrequently, it is important that we minimize the total survey error associated with the study design.

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.

VA will be the primary user of the results from the NSV. VA will use the results to help evaluate VA programs, as required under Section 527, Title 38 U.S. Code, and to assess awareness of Veterans' benefits and services, as required under P.L. 108-454, section 805. Information will be collected on the following topics: demographics, familiarity with Veteran benefits, disability and vocational rehabilitation, health status, health care, health insurance, education and training, employment, life insurance, home loans, burial benefits, burial plans, Internet use, income, and demographics. VA will use the collected survey data to:

- o Understand the level of awareness the Veterans have on VA services and benefits;
- o Determine current and future use of VA services and benefits;
- o Determine best methods to disseminate information on VA benefits and services; and
- o Craft VA policies to plan and make quality improvement decisions.

VA's overall goal in using the data will be to monitor and improve Veterans' services and benefits for the health and well-being of the 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 decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

There are two general approaches that will be used to contact the various populations of interest on the NSV. The first approach will use a list sample method to reach the active duty service members, spouses of active duty service members, and the demobilized National Guardsmen and Reservists to be surveyed. Samples of these three populations will be drawn from DoD's Defense Enrollment Eligibility Reporting System (DEERS). After sample selection, members will receive a cover letter with a URL and Username/Password that will allow them to complete the extended survey as a web survey. These sampled members will also be given the option of completing the NSV survey on paper if they prefer not to complete the survey by web. Paper surveys will be mailed directly to non-respondents following a reminder postcard mailing as part of the wave 2 mailing. (Because these samples will be drawn from a list, there is no screener instrument for these populations.) The last extended contact will offer the web address, the paper survey, and the opportunity to call a toll-free number to complete the interview over the telephone.

A second approach will be used to contact the remaining populations of interest: Veterans, spouses of Veterans, and surviving spouses of Veterans. These populations will be screened using address information from multiple sources including VA files and the U.S. Postal Service Delivery Sequence File (DSF). Since the sampling frame for this residential survey will be address based, the NSV Study will use mail as the initial mode of communication with the household. When a screener instrument is completed by a household, Veterans and spouses will be enumerated, and eligible participants will be invited to complete an extended survey. Based on mode preference volunteered at the screener level, respondents will be given the option of completing the extended survey via paper or web. The last extended contact will also offer the respondent the opportunity to call a toll-free number to complete the interview over the telephone.

The offer to use the web to complete the interview for both of these groups accommodates those that prefer to complete the survey in this mode. The web offers an inexpensive survey mode that has a number of advantages over a paper survey, including the ability to control the navigational path of the respondent. The web survey will be especially important for the younger, more mobile, populations that are more accustomed to providing information using this mode of communication. For the extended survey, the procedures provide respondents with a choice of mode. However,

regardless of this choice, the follow-up procedures give each sampled individual an opportunity to fill out the survey in ways that are most convenient to him/her.

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.

Currently, there are no national surveys that address the full array of benefits and services that VA makes available to the Veteran population. In addition, there are no data collection efforts that respond to Public Law 108-454, section 805; the NSV will be used to respond to this Congressional legislation.

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.

The sample for the NSV will be drawn from either a list frame or U.S. residential addresses. No small businesses will be surveyed.

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.

The NSV is conducted periodically. The data from the last NSV (completed in 2001) are greatly out of date. Not only are the 2001 data out of date, they miss entirely an important subpopulation: recent Veterans of Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF). Finally, Public Law (P.L.). 108-454, section 805 requires that VA conduct a national survey of Veterans. In addition, P.L. 108-454 requires that VA survey several populations for a first time, including active duty service members; demobilized National Guardsmen and Reservists; spouses; and surviving spouses.

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 secrets, 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.**

There are no special circumstances.

- 8a. Part A: If applicable, provide a copy and identify the date 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 notice was published in the Federal Register on February 10, 2009, Volume 74, Number 26, Page 6696 and expired on April 13, 2009. There were no comments received in response to this notice.

- 8b. Part B: 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Outside consultation from Westat:

- David Cantor, Senior Methodologist, 301-294-2080
- Robert Fay, Senior Statistician, 240-314-2318
- Richard Sigman, Senior Statistician, 240-453-2783

- Pamela Giambo, Senior Study Director, 240-453-2981
- Michele Harmon, Senior Study Director, 301-294-3814
- John Helmick, NSV Project Director, 301-294-2010
- Wayne Hintze, NSV Associate Project Director, 301-517-4022

VA staff who participated in the NSV design includes:

- Maribel Aponte, NSV COTR/Project Manager, Office of Policy and Planning, 202-461-5790

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

The VA will not offer payment or gifts to respondents as incentives to complete the NSV screener or extended questionnaires.

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

The NSV is being conducted for the Department of Veterans Affairs (VA) to assess future programs and benefits. Participation in this effort is strictly voluntary, and all responses will be kept confidential and used only for the purpose of this study.

All collected information is protected by the Privacy Act of 1974 (5 U.S.C. 522a) and the VA Claims Confidentiality Statute (38 U.S.C. § 5701) as implemented by 38 CFR § 1.526(a), 38 CFR § 1.576(b). Additionally, 38 U.S.C. 7332 places restrictions on the release of information relating to drug abuse, alcoholism or alcohol abuse, sickle cell anemia, or infection with the human immunodeficiency virus. System of records notice “Veterans, Service Members, Family Members, and VA Beneficiary Survey Records-VA” (43VA008) outlines VA’s data security measures for this effort.

Any disclosure of information involves the release of statistical data and other non-identifying data for the improvement of VA benefits processing system and for associated administrative purposes. If you have comments regarding this burden estimate or any aspects of this collection of information, please contact the VA Clearance Officer (005R1B), address: 810 Vermont Ave., NW, Washington, DC 20420.

All identifying information will be protected and masked with a pre-coded identification number. Only the survey vendor will have access to the identities associated with each number. The survey vendor protects (and will continue to protect) the Web survey application with a password and identification number. Sampled households can access the Web survey ONLY with the password and ID assigned to them.

- 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.**

For the residential approach, the screening survey asks households to indicate whether a Veteran, spouse, or survivor resides at the address. The extended survey instruments will ask standard demographic questions (e.g., age, gender, race, income) along with questions such as awareness of benefits and services, health care usage, and so forth.

- 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 13.**

For the address-based sample approach (Veterans and spouses), the screener questionnaire (Attachment 1) includes a very limited set of questions. We estimate that the screening survey will take

no more than five minutes to respond to. We estimate that there will be 42,437 responses to the screener, for a total burden of 3,536 hours ($42,437 * 5/60$).

Of the 42,437 screener responses, we estimate that 16,988 responses (approximately 40%), will be from Veteran households. All Veterans enumerated at the screener phase will be provided an extended survey and asked to complete it. Spouses and surviving spouses identified at the screener phase will be subsampled for the extended phase. From the 42,437 screener respondents, we expect to receive extended surveys from a subset of these respondents across the address-based sample subpopulations (Veterans, spouses, and survivors). For the list sample, extended surveys will be received from active duty service members, spouses of active duty members, and demobilized members of the National Guard and Reserves. Additionally, we expect to conduct interviews and debriefings with respondents as part of our cognitive testing activities. Total burden hours for these pretesting activities are 98 hours. Table 1 shows how many respondents are estimated to submit each of the survey instruments (screener and extended) plus the respondents participating in the pretestings, as well as corresponding time and cost burdens for each of these groups. The total number of respondents (56,273) is calculated by summing all of the expected respondents to all questionnaires for both the screener (42,437), extended stages (13,738), and pretestings (98). Although it is possible that the same individual may complete a screener and an extended questionnaire among the address-based sample, they are counted separately toward the total since they are responding to two separate questionnaires and are burdened by their participation at both stages. Therefore, the total respondents may not be a count of unique individuals that are participating. The estimated minutes per respondent (11.7) is calculated by dividing the total burden minutes ($11,015 \text{ hours} * 60$) by the total number of respondents (56,273). The total cost per respondent (\$4.62) is calculated by dividing the total cost of all interviews (\$259,719) by the total number of respondents (56,273).

Table 1. Time and Cost Burden

Survey Type	Respondents	Estimated Minutes/ Respondent	Estimated Cost/ Respondent	Total Cost of All Interviews	Total Cost/ Hour	Total Burden Hrs
Screener – Veteran HH	16,988	5	\$1.92	\$32,681	\$23.08	1,416
Screener – non-Veteran HH	25,449	5	\$1.92	\$48,952	\$23.08	2,121
Extended - Veteran	11,482	35	\$13.94	\$160,083	\$23.08	6,698
Extended – Veteran Spouse	602	15	\$5.77	\$3,474	\$23.08	151
Extended – Surviving Spouse	75	12	\$4.62	\$346	\$23.08	15
Extended - Active Duty Service Member (including activated NG/R)	752	15	\$5.77	\$4,339	\$23.08	188
Extended – Demobilized NG/RC	752	25	\$9.62	\$7,232	\$23.08	313
Extended – Active Duty Spouse	75	12	\$4.62	\$346	\$23.08	15
Testing Activities	98	60	\$23.08	\$2,262	\$23.08	98
Total	56,273	11.7	\$4.62	\$259,719	\$23.08	11,015

13. Provide an estimate for 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 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 collections 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.**

There is no capital cost to respondents.

- 14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The overall contract with the survey vendor (for design and implementation of the NSV) is a Firm Fixed Price contract. The survey vendor estimates that its cost for conducting the data collection phase of the NSV will be \$1,158,441.

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

This is a request for a new 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 results from the NSV Study will be analyzed and published in a final report for public consumption. Publication of results will include the survey methodology as well as summary statistics and findings for the various populations of respondents. The analysis plan will include point estimates with the associated standard errors and general cross-tabulations of survey variables/items to compare results across various population demographics at the aggregate (National) level on the extended questionnaire. The results will not allow researchers or the client to associate any findings

to any individual. No identifiable individual survey responses will be released or provided to the public or client.

The current schedule has the NSV in the field from October 9, 2009, until February 26, 2010. Thus, data collection will close before the Census blackout period (beginning March 1, 2010). The VA plan is to disseminate results to the public by December 20, 2010.

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.

We plan to display the OMB approval number and expiration date on all NSV survey instruments.

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

There are no exceptions to the certification statement.