

Supporting Statement for eBenefits portal

A. JUSTIFICATION

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

The President's Commission on Care for America's Returning Wounded Warriors (Dole/Shalala) established by Executive Order 13426 in March 2007 recommended the creation of a My eBenefits (a.k.a. eBenefits) web portal to provide the wounded, injured and ill service members/veterans, their families and care providers a single sign-on, central access point to online benefits and related services. The Commission proposed six broad recommendations along with 23 action steps to complete the recommendations.

Recommendation 5.0 directs to Rapidly Transfer Patient Information between DoD and VA and that DoD and VA must move quickly to get clinical and benefit data to users. In addition, DoD and VA should jointly develop an interactive "My eBenefits" website that provides a single information source for service members. The report also stated that the Department of Defense and Veterans Affairs should make information about benefits and services available online, via a password-protected site in which service members and veterans can securely enter personal information.

- 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.**

The site users' information will be used in an automated fashion by the site to provide services to authenticated users, such as personalized site pages that show the medical appointments that they have made through the system, their calendar of appointments, a site locator service that will allow them to find VA or other relevant facilities in their geographic area, or display alerts about their online appointments or applications for applicable benefits. Site users include service members, veterans, their families, and their designated care-givers. Any personalized content and features will be provided to users only after login, to ensure the security of users' information.

- 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.**

All personal information collected via the eBenefits portal will be collected electronically via forms on the portal pages. The eBenefits portal will ultimately serve to reduce paperwork for veterans in that they will be able to fill out applications for benefits online, and it may also reduce phone traffic, in that they will be able to make some doctor appointments online.

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.

The eBenefits team has been charged with researching and identifying existing sources for required information and content as part of this project. In an effort to utilize the most appropriate approved sources for each type of information, the team has contacted the teams responsible for VA and DoD partner sites, such as MyHealthVet (VA) and Tricare Online (DoD) to find the available sources for features so that they will not have to be duplicated on the eBenefits portal. These features will be linked to from the portal at first, and in later releases of the eBenefits portal, will be integrated into the portal, without duplicating effort or technology.

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

The collection of information does not impact small businesses in any known way.

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.

The team is acting to serve the mandate indicated by the Dole-Shalala report, to provide a great service to America's returning and wounded warriors and veterans. Currently veterans and service members do not have a single online source for benefits information. If the site does not collect personal information, there will be no way to offer the types of personalized features listed above, and the portal will not provide the intended conveniences and functionality to assist these users.

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.

None of the special circumstances described in this section will occur as a result of collecting personal information on this portal.

- Respondents will not have to submit information more often than quarterly.
- They will not have to prepare any written responses in less than 30 days.
- There will be no rule on this portal that requires respondents to submit more than one original and 2 copies of any document.
- There is no survey on the portal that is not intended to provide valid, reliable, and generalized (anonymous) results.
- There will be no requirement for a statistical data classification that has not been reviewed and approved by OMB.
- There is no pledge of confidentiality not supported by authority established by statute or regulation. All terms and conditions and privacy policies set forth by the VA and DoD will be followed and posted on the portal.
- There will be no requirement to submit proprietary trade secrets or other confidential information other than the user's own personal information, which is fully voluntary.

8a. 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 Department Federal Register notice was published on July 30, 2009, Volume 74, Number 145, at page 38089. There were no comments received 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.

The stakeholder community for this project includes members from VA and the Department of Defense, all of whom were consulted for requirements to

collect this data. It is expected that further consultation will include representatives from both agencies.

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

There is no payment or gift to respondents.

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

Users' personal information will be kept private, in strict accordance with the VA and DoD online privacy policies. Links are provided to the Privacy & Security Notices, as well as the Paperwork Reduction Act.

We have SORN 58VA21/22/28 "Compensation, Pension, Education and Rehabilitation Records-VA" for benefits, and SORN 130VA19 for Medical

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 is no request or need for sensitive information such as sexual behavior or religious beliefs.

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

In terms of the hour burden on individual users, the assumption is that the collection of information in the site registration form would take no more than 5 minutes per user, including disabled users who are utilizing reading devices. The anticipated estimated registered user base is approximately 2.7 million users; however, this number is based on estimates of potential users prior to the launch of the portal. Users would respond at their own discretion, to gain the benefit of personalized portal use. Response is not mandatory.

So the total number of hours would be estimated at:

2,700,000 users X 5 minutes per user = 225,000 hours

*** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.**

This request covers only one form and system.

*** 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.**

Based on the 225,000 hours noted above, at an assumed rate of \$15/hr the cost would be \$3,375,000.

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 is no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There are no 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.

The annual cost to Federal Government is incurred by contractor staff who prepare the database environment to receive the information, the visual design of the form, and staff (GS-12) who aggregate the data for reporting.
Staff: \$3240 per year
Contract staff: \$4480 per year
Total: \$7720

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

This is a new program change.

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 is no plan to publish users' personal information from the portal. Initial launch of the project is planned for approximately June 30, 2009, and information collection will happen on an ongoing but fully voluntary basis: users can add to their own personal profile information, or change, it at any time, on demand.

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 do not seek approval to omit 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.