

SUPPORTING STATEMENT

Contractor Surveys

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collections. Attach a copy of the appropriate section of each statute and of each regulation mandating or authorizing the collection of information.

The Federal Employees' Compensation Act provides workers' compensation coverage to three million federal and postal workers around the world for employment-related injuries and occupational diseases.

The Division of Federal Employees' Compensation (DFEC) adjudicates new claims for benefits and manages ongoing cases; pays medical expenses and compensation benefits to injured workers and survivors; and helps injured employees return to work when they are medically able to do so, to include, if applicable, vocational rehabilitation assistance in returning to work. The program has 12 district offices nationwide to assist in the management of the program. The offices are located in the following cities: Boston, New York, Philadelphia, Jacksonville, Cleveland, Chicago, Kansas City, Denver, San Francisco, Seattle, Dallas, and Washington, D.C.

As part of its 2008 Performance Analysis Rating Tool (PART) evaluation by the Office of Management and Budget of the FECA program, the OMB directed DFEC to conduct an "Impact Evaluation" of program effectiveness. An impact evaluation measures the effectiveness of the program and the extent to which its goals were achieved. To comply with the OMB directive, DFEC designed a study to focus on the effectiveness of its Disability Management (DM) activities. DM consists of the delivery of services that include early intervention by nurses, coordination of medical care and management of the disability, and assistance with return to work, including vocational rehabilitation. DOL awarded a contract for the evaluation to SRA, Inc.

Objectives of the study include a mapping out of the DM conceptual framework, (including workflow, staff roles and responsibilities, and processes), measurement of performance results, and an assessment effective workings of DM procedures and the coordination and execution of roles of the Federal and contractor staff involved in DM.

DFEC uses three different types of contract employees to provide DM assistance services: COP Nurses, Field Nurses, and Rehabilitation Counselors. DFEC seeks to solicit input regarding program effectiveness, via surveys, from these 3 groups of contract employees, whose functions are briefly described below.

COP Nurse – A COP Nurse is a registered nurse who is assigned early in the life of a traumatic injury case and works each case telephonically. The information obtained is then used to make decisions about the best path for that particular case. COP Nurse responsibilities include the following: contacting the claimant to obtain a history of

injury, history of treatment and current work status; confirming the work status with the employing agency and ascertaining whether accommodations are available if needed; and contacting the physician's as needed to obtain a verbal history of treatment and expected treatment plan.

Field Nurse – A Field Nurse is a registered nurse who assists in the management of disability claims. Unlike the COP Nurse, the Field Nurse's contact is often times in person with the claimant, employing agency and medical providers. The Field Nurse's responsibilities include the following: developing a rapport with the claimant and answering questions about what to expect from OWCP; making determinations about the initial extent of the injury, treatment necessary for recovery and return to work expectations; attending the claimant's medical appointments to facilitate communication about return to work and ease any authorization difficulties the physician may be encountering; and obtaining functional capacities, restrictions and limitations from the physician and then providing these to the employing agency.

Rehabilitation Counselor – The Rehabilitation Counselor is a certified counselor who works directly with the claimant in the return to work effort, whether with the former employer or with a new employer. The Rehabilitation Counselor's responsibilities include the following: evaluating the claimant's vocational abilities and transferable skills; arranging for vocational testing and training; conducting labor market surveys; formulating a vocational re-employment plan; assisting the claimant with job seeking skills such as resume building and interview techniques; arranging for specialized ergonomic job and home modification services; and making recommendations to overcome any barriers hindering the return to work effort.

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.

The evaluation, which is a new survey collection, will enable DFEC to assess the quality and types of services being provided during the return to work period by seeking input from those individuals who have actually provided assistance and worked directly with these cases.

The overall purpose of the surveys is to systematically obtain information from the three groups identified above which can be then be used to identify problems or areas that could be targeted for improvement with our delivery of services during this crucial period when an injured employee is out of work.

Note: The initial selection of nursing and vocational rehabilitation personnel will be based on case assignments to nurses and vocational rehabilitation counselors for the period October 1, 2008 through December 31, 2009.

The COP Nurse Survey has 16 questions. The Field Nurse Survey has 30 questions. The Rehabilitation Counselor has 14 questions. It is anticipated these surveys will be used periodically.

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.

DFEC will deliver the survey universe to Systems Research and Applications (SRA) International, Inc., which has been contracted to conduct this survey as part of an impact evaluation. SRA will send out an explanatory letter to the participants, and the letter will have a web link to follow to access the survey. The web-based access system is established to meet the goals of the Government Paperwork Elimination Act (GPEA), and it is anticipated that the implementation of this system will save the government money since printing and postage will not be required.

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 information to be supplied on these surveys will not be duplicated on any other information collection.

5. If the collection information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Not applicable. The questions are being asked only of individual customers of DFEC.

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.

DFEC's ongoing program improvement plans involve obtaining an outside assessment of the program's performance. This study is an essential component of evaluating whether the program is effective and achieving its results. Failure to conduct this survey would deprive DFEC of an important tool in making such an evaluation and of identifying areas for improvement.

7. Explain any special circumstance.

There are no special circumstances for the collection of this information.

8. 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.

This is a new collection. A Federal Register Notice, 75 FR 34768, inviting comment was published on June 18, 2010. The agency received no comments in response to this notice. A 30 day Notice, FR Register Number 75 FR 61177, was published on October 4, 2010, and pending comment.

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

No payment or gift will be provided to respondents in this study.

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

Participation in this effort is strictly voluntary, and all responses will be kept confidential and used only for the purposes of this study. Participants will not be required to provide any identifying information such as name, claim number or social security number. The responses will be anonymous. 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 an individual. We will not provide information that identifies a survey participant to anyone outside the study team, except as required by law.

There will be no paper surveys obtained as a result of these surveys. Nonetheless, the applicable Privacy Act system of records is called DOL/GOVT-1. See Web site: <http://www.dol.gov/sol/privacy/dol-govt-1.htm>.

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.

This data collection will not involve sensitive questions.

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 make special surveys to obtain information on which to base burden estimates. Consultation with a sample of potential respondents is desirable. If the burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated burden and explain the reason for the variance. Generally, estimates should not include burden hours for customary and usual business practices. Provide estimates of the hour burden of the collection of information.

The three attachments (COP, Field Nurse, and Rehabilitation Counselor surveys) cover a broad array of questions; however, we estimate that the surveys will take 10-15 minutes to complete. This estimate was determined by testing the survey questions and evaluating time to completion.

During the period October 1, 2008 and December 31, 2009, there were approximately 1,100 COP Nurses, Field Nurses and Rehabilitation Counselors assigned to cases. Note: These personnel may be assigned more than one claim.

The estimated response rate is 30% for the surveys; therefore, the total number of respondents is estimated to be 330. With a projected survey response estimated at 330, the total burden is 68 hours. The statistical analysis used for this survey is noted in Supporting Statement B.

The following chart shows the projected burden hours for this collection.

Form	Time to Complete	Frequency of Response	Number of Participants	Number of Responses	Hours Burden
Customer Satisfaction Survey-COP Nurse	10 min.	1	132	132	22
Customer Satisfaction Survey-Field Nurse	15 min	1	162	162	40
Customer Satisfaction Survey-Rehabilitation Counselor	10 min	1	36	36	6
Total			330	330	68

13. Annual Costs to Respondents (capital/start-up & operation and maintenance).

The cost to participants should be negligible. Participation is voluntary and will not require start-up, capital, or labor expenditures by respondents. All responses will be web-based.

14. Provide estimates of annualized cost to the Federal government.

The cost to the Government is \$10,249.44, which includes printing and mailing the survey notification, as well as the costs paid to SRA International for the survey development and administration.

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

This new information collection will increase OWCPs information collection burden by 330 responses and 68 hours. DOL associates no additional costs with this information collection. As previously stated the 2008 PART evaluation by OMB of the FECA program, resulted in OMB directing DFEC to conduct an “Impact Evaluation” of program effectiveness. An impact evaluation measures the effectiveness of the program and the extent to which its goals were achieved. To comply with the OMB directive, DFEC designed a study to focus on the effectiveness of its Disability Management (DM) activities. DM consists of the delivery of services that include early intervention by nurses, coordination of medical care and management of the disability, and assistance with return to work, including vocational rehabilitation. DOL awarded a contract for the evaluation to SRA, Inc.

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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 information, completion of report, publication dates, and other actions.

Results will primarily be for internal use and process evaluation. Results will be shared with the Office of the Secretary of Labor and may be published if deemed appropriate.

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.

No exception to the display of the expiration date is sought.

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

No exception.