

VSO Access to VHA Electronic Health Records
VA Form 10-0400
OMB 2900-0710

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 information is being used to establish VA Veterans Health Information Systems Technology Architecture (VistA) computer accounts for Veteran Service Officers (VSO's) who have been granted Power Of Attorney by veterans who have medical information recorded in VA electronic health records. This information is collected under the authority of Title 38, CFR Parts 51 and 52, Veterans Benefits.

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 information will be used by VHA Office of Health Information Governance and/or contractors to create accounts in the VistA computer system for VSO's. The information collected is used for a national roll-out of a project targeted at providing more efficient benefits processing services to veterans. The VistA system requires a minimal set of data to create an account, which has been reflected on the form. After the initial roll-out, the burden to the government will be minimal, only involving VSO staff turnover.

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.

The information will be collected on a paper form printed from a VA website or e-mailed directly to the VSO and which is subsequently processed by VA Information Technology and Information Security staff. The form will be sent nationally to a single central fax server which will then securely route the information to the correct VA representatives for processing.

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.

This project involves collecting the information one time and providing VSO's access to over 130 individual VistA accounts. Currently, they would need to fill out an access request form at every facility to which they would require access or would need to contact facilities individually when they wish to access a veteran's record. The form will significantly reduce the paperwork burden from hundreds of forms and contacts per VSO to a single form and point of contact in the government.

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

No small businesses are impacted.

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 ability of VSO's to access VHA electronic medical data would speed up the processing of veteran disability claims by allowing individuals familiar with VA policy and procedure to act on behalf and provide guidance to the veteran. In this time of increased awareness by Congress of veteran issues, it is to the benefit of the VA, Veteran Service Organizations and especially the individual veteran, to provide this level of access. This information is already available to VSO's through a more complicated paper request process. By providing the records electronically, the VA will be demonstrating our dedication to expedite and facilitate resolution of veteran compensation and pension claims.

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 none. The form is filled out one time unless the user allows their VA access to expire or leaves their service organization.

8. 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 notice of Proposed Information Collection Activity was published in the Federal Register on July 8, 2011, page 40454. The notice of Proposed Information Collection Activity was published in the Federal Register on July 8, 2011, (Volume 76, Number 131), page 40454. VA received two comments in response to this notice. The first comment was received from Mr. Rick Little of the Public Counsel Organization, July 8, 2011. The second comment was received, via personal email from Mr. Ramon C. Mangilliman, July 8, 2011. Both comments and VA's response are posted in ROCIS.

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.

VSO's have specifically asked for this access and have been informed of the kind of information needed to provide VistA access.

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 privacy to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Assurances of privacy are contained in the VA Notice of Privacy Practices and 38 U.S.C. Sections 5701 and 7332. Respondents are informed that the information collected will become part of the Consolidated Health Record that complies with the Privacy Act of 1974. These forms are part of the system of records identified as 79VA19 “Veterans Health Information System and Technology Architecture (VISTA)-VA” as set forth in the 2005 Compilation of Privacy Act Issuances.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), 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.

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

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:

No. of respondents	x 1 responses	X 2 min.	/ by 60 =	Burden Hours
500	500	1000	17	17

b. 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. VA form 10-0400.

c. 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.

We do not require any additional recordkeeping. The cost to the respondents for completing these forms is \$255 (\$15 per hour x 17 burden hours).

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).

There is no anticipated record keeping burden.

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 estimated annual cost of VA Form 10-0400 to the Federal Government is \$1,196.
Processing 500 claims x 4 min x \$35.88/hr (GS 12) / 60 = \$1,196

15. Explain the reason for any burden hour changes since the last submission.

VHA has adjusted the number of respondents from 12,000 to 500, which has resulted in the reduced amount of burden hours. This adjustment more accurately portrays the number of respondents that we have received during the past two years, since the inception of this 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.

We do not plan to publish this data.

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 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.