

## **SUPPORTING STATEMENT**

### **Paralympics Monthly Assistance Allowance Application and Certification**

#### **VA Forms 0918a, 0918b**

##### **A. Justification**

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

Section 703 of the Veterans' Benefits Improvement Act of 2008, P.L. 110-389, authorizes the Department of Veterans Affairs (VA) to administer a monthly assistance allowance to a veteran with a service-connected or non service-connected disability if the veteran is competing for a slot on or selected for the United States Paralympics team or is residing at a United States Paralympics training center.

**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 to certify eligibility for the monthly assistance allowance, verify the veteran's mailing address, confirm that he or she has been accepted by the Paralympics to compete in a specific Paralympic sport, and to determine their marital status and number of dependents for the purpose of assessing payment amounts.

**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.**

Current information collections are done on paper forms because the application and certification forms collect information from the beneficiary and their Paralympic representative. These applications are manually entered into a database for program planning and implementation.

**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 information collection is specific to a beneficiary's involvement in Paralympic sport training. VA has no other collections containing Paralympic sport information and as such VA has determined that the collection does not duplicate an existing collection.

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

Since these are applications for individual benefits, no small businesses or other small entities are impacted by the 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.**

The collection will be to enroll beneficiaries for this monthly assistance allowance, determine the amount of the allowance, and to certify eligibility for the allowance. VA would not be able to implement the provisions of Section 703 of the Veterans' Benefits Improvement Act of 2008, P.L. 110-389, without this collection.

**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.

**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.**

**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 Information Collection notice was published in the Federal Register /Vol. 75, No. 171 / Friday, September 3, 2010 / Proposed Rules 54069 under the regulation identification number RIN 2900-AN43. VA received no comments related to the information collection, cost burden nor respondent hour burden.

**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 statute, regulation, or agency policy.**

Assurances of confidentiality are contained in 38 U.S.C. 5701 and 7332. Respondents are informed that the information collected on forms VA0918a and 0918b will become part of the system of record identified as 58VA21/22/28 "Compensation, Pension, Education, and Rehabilitation Records – VA" as set forth in the Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html>.

**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.**

This information collection will be submitted by the respondent and their Paralympic representative. The collection contains no information that would not otherwise be made available to the respondent.

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

VA Form 0918a, "Certification of United States Paralympics Training Status."

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

VA Form	No. of respondents	No. of responses	Total Responses	No. of minutes	÷ by 60	= Number of Hours
VA0918a	100	4	400	5		33

VA Form 0918b, "Application for Monthly Assistance Allowance for Veterans in Connection with the United States Paralympics."

VA Form	No. of respondents	No. of responses	Total Responses	No. of minutes	÷ by 60	= Number of Hours
VA0918b	100	1	100	20		33

**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 two forms. See chart in subparagraph 12a above.

**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.**

At this time, VA does not require any additional recordkeeping. The cost to the respondents for completing these forms is \$990.00 (\$15 per hour multiplied by the 66 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).**

Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.

**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.

Estimated costs to the federal government for this data collection include distribution and receipt of applications: 30 hours. The cost for 30 hours at the GS-14, step 1 rate (\$50.41 per hour) is \$1512.00.

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

This is 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.**

VA does not intend 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.**

VA is not seeking approval to omit the expiration date on these forms.

**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.

**18. B. Employing Statistical Methods**

The data collection does not employ statistical methods