

Application and Reporting Requirements to Receive Grants Under 38 CFR 17.703 RIN 2900-AO01

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 307 of Title III of the Caregivers and Veterans Omnibus Health Services Act of 2010 (section 307) requires VA to establish a new program to provide grants to eligible entities to assist veterans in highly rural areas through innovative transportation services to travel to VA medical centers, and to otherwise assist in providing transportation services in connection with the provision of VA medical care to these veterans. Paragraph (a) of section 307 mandates that VA will award grants to eligible entities for these purposes, and paragraph (b) of section 307 mandates that VA will establish procedures for evaluating grant applications. This collection of information is necessary to fulfill VA's obligations under section 307.

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 VA Veterans Transportation Service (VTS) to evaluate multiple criteria under section 307 to confirm grantee eligibility, to score grantee proposals according to application criteria, to ensure program efficacy and appropriate use of grant funds, and finally to record veteran satisfaction with the program. The application information will indicate whether and to what extent a grant program is likely to be successful in meeting the intent of section 307 to transport veterans in highly rural areas to receive medical care. The reporting requirements are: Annual and quarterly reports to ensure efficacy of program delivery; quarterly fiscal reports to ensure appropriate use of grant funds; and patient satisfaction surveys to ensure the program meets veteran needs. The new collections include the application, and the annual and quarterly reports. Existing collections include the supplemental grant application standard form (SF-424), quarterly fiscal reports (SF 425), and the patient satisfaction survey (VA form 10-0517).

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.

This collection will use automated, electronic collection techniques in the form of an online application and submission process, as well as an online reporting and submission process. The decision for this means of collection is based on ease of application submission and completion for eligible entities to receive a grant, and ease of receipt of applications for VA.

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.

VA does not have a similar collection of information for the application because the requirement to provide this information is created by the proposed rulemaking. There will be no duplication because

similar information regarding veteran enrollment and dependent or survivor status cannot be used or modified for the purposes of this program.

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

VA does not expect impacts on small businesses or other small entities. The affected parties, the potential grantees, are not small businesses or small entities.

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.

VA must administer this grant program in line with the mandates in section 307, and without this collection VA cannot score grant applications, award grants, or otherwise administer this grant program.

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.

The notice of Proposed Information Collection Activity was published in the Federal Register on December 30, 2011 (Volume 76, Number 251, page 82215). VA received a few comments in response to this notice. Some commenters stated that the eligibility criteria as related to the likely respondents were too restrictive; the response was that VA may only administer grants to the two defined entity types under section 307. Some commenters stated that the scoring criteria to be instituted by the application did not properly assess the needs of an area for transportation assistance; the response was that the application criteria properly and reasonably assess the needs of only those certain types of "highly rural areas" that are permitted to receive these grants under section 307. One commenter requested that the reporting and monitoring requirements be more stringent to ensure appropriate use of grant funds; the response was to increase the reporting requirements for program efficacy to include monthly reports.

There were a total of 17 Public Comments. The link below provides the name of the commenter and their affiliations.

<http://www.regulations.gov/#!docketBrowser;dct=PS;rpp=25;po=0;D=VA-2012-VHA-0004>

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.

Outside consultation is conducted with the public through the 60-day Federal Register notices.

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.

This information will not include Protected Health Information (PHI) or Individually Identifiable Health Information (IIHI).

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:

The overall burden hour is 7,550. The 3 year average equals 2,517 burden hours. The respondent total is 2000. The average number of respondents per year is 667.

1 st Year Burden Hours					
VA Form 10-10055	No. of respondents	x 1 response	x 1500 minutes	÷ by 60=	Number of Hours
Initial Grant / Renewal Application	100	100	15000		2500

VA Form 10-10056	No. of respondents	x 4 responses	x 15 minutes	÷ by 60=	Number of Hours
Quarterly Report	150	600	9000		150

VA Form 10-10056	No. of respondents	x 2 responses	x 120 minutes	÷ by 60=	Number of Hours
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Semi-Annual Report	150	300	36,000		600
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VA Form 10-10056	No. of respondents	x 1 responses	x 120 minutes	÷ by 60=	Number of Hours
Annual Report	150	150	18000		300

VA Form 10-10056	No. of respondents	x 1 responses	x 120 minutes	÷ by 60=	Number of Hours
Final Report	150	150	18000		300

Subsequent Year Burden Hours					
VA Form 10-10055	No. of respondents	x 1 response	x 600 minutes	÷ by 60=	Number of Hours
Renewal Grant Application	50	50	30,000		500

VA Form 10-10056	No. of respondents	x 4 responses	x 15 minutes	÷ by 60=	Number of Hours
Quarterly Report	150	600	9000		150

VA Form 10-10056	No. of respondents	x 2 responses	x 120 minutes	÷ by 60=	Number of Hours
Semi-Annual Report	150	300	36,000		600

VA Form 10-10056	No. of respondents	x 1 responses	x 120 minutes	÷ by 60=	Number of Hours
Annual Report	150	150	18000		300

VA Form 10-10056	No. of respondents	x 1 responses	x 120 minutes	÷ by 60=	Number of Hours
Final Report	150	150	18000		300

b. 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.

There is no cost to respondents.

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 recordkeeping 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.

Section 307 of Pub. L. 111-163 states that there is authorized to be appropriated \$3,000,000 for each of fiscal years 2010 through 2014 to carry out this program. Based on projected administrative costs and the number of grants to be funded, the Grants for Transportation of Veterans in Highly Rural Areas program would cost as follows:

Fiscal Year	FTE Cost (GS 13/2)	Space/IT Cost	Other Costs	Grant Funds to be Awarded	Total
2012	\$118,389	\$10,000	\$115,000	\$2,750,000	\$2,993,389
2013	\$123,125	\$10,000	\$115,000	\$2,750,000	\$2,998,125
2014	\$128,050	\$10,000	\$115,000	\$2,750,000	\$3,003,050

FTE Cost

FTE cost is based on one (1) GS-13/2 with a salary rate of \$88,350 + 34% for benefits for a total of \$118,389. A 4% inflation rate was applied to the FTE Cost for FY2013 and FY2014. The purpose of this position is to serve as the National Program Coordinator for the Rural Transportation Grants program and is dedicated to maintaining and improving access to medical care services for Veterans through transportation. The Program Coordinator will work directly with the Chief Business Office, Veterans Transportation Service, Veterans Service Organizations, State Veterans Service Agencies, and field staff to guide implementation and administration of the Rural Transportation Grants program.

Space/IT Cost

VA intends to rent office space each fiscal year in the amount of \$5,000 for the new FTE. Additionally, IT costs for the FTE to perform his duties will be \$5,000, for a total of \$10,000.

Other Costs

VA assumes there will be additional costs each fiscal year in the amount of \$115,000. This additional cost will be used for the review of initial grant applications and annual review of renewal applications for the program. Additionally, a conference is being planned to announce and initiate the Rural Transportation Grants Program.

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14 of the OMB form 83-1.

This is a new data collection. All hours are considered a burden increase.

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.

These collections will not be published.

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.

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.