

**SUPPORTING STATEMENT
VA NATIONAL VETERANS SPORTS PROGRAMS AND SPECIAL EVENTS**

Renewal of Event Applications

August 21, 2013

**VA Forms
0924, 0925, 0926, 0927, 0928, 0929**

OMB 2900-0759

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 Department of Veterans Affairs (VA) administers National Rehabilitation Special Events for Veterans who are receiving care at VA medical facilities. These events are: The National Disabled Veterans Winter Sports Clinic, National Veterans Wheelchair Games, National Veterans Golden Age Games, National Veterans Creative Arts Festival, National Veterans Summer Sports Clinic and National Veterans Training, Exposure and Experience (TEE) Tournament. Each event promotes the healing of body and spirit by motivating eligible Veterans to reach their full potential, improve their independence, achieve a healthier lifestyle and enjoy a higher quality of life.

Veterans eligible for VA medical care may apply to attend these events using event applications. Information collected on these applications is used for the planning, distribution and utilization of resources and to allocate clinical and administrative support to patient treatment services. Legal authority to collect such information is under 38 USC, Chapter 5, Section 521 and Chapter 17, Section 1710.

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.

Current access to information collected for the purposes of administering VA National Rehabilitation Special Events is limited to VA employees whose official duties require such access for the purposes of program planning, implementation and evaluation. Access may occur through physical review of paper applications as well as VA computer systems containing security software and user authentication requiring unique codes and passwords. VA staff accessing such

information have received information security training and have been instructed on their responsibility to maintain confidentiality of the 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 describe any consideration of using information technology to reduce burden.

Current information collections are done on paper forms. This is because each applicant must submit numerous documents pertaining to the event, plus a medical clearance form that must be filled out by their health care provider. These applications are manually entered into a database for program planning and implementation. In 2011, the Office of Public and Intergovernmental Affairs established a working group to explore the possibility of using automated or electronic collection techniques in lieu of paper forms. VA is working toward implementing a viable solution.

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 Office of Public and Intergovernmental Affairs (OPIA) has examined whether the national rehabilitation special event applications represent a duplicate collection of information. This examination identified three unique factors necessitating the collection: (1) the need for a current, event-specific medical evaluation, (2) the need for respondents to select specific events for which to participate, and (3) the nature of having a new host VA medical center each year for three of the events. VA medical centers submit bids to host the Wheelchair Games, Golden Age Games and Creative Arts Festival. The availability of specific resources in these host communities influences the data collection. This led to the determination 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 is conducted to register eligible Veterans for the events. VA would not be able to provide these rehabilitative programs 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 notice of Proposed Information Collection Activity was published in the Federal Register on Sept. 11, 2013, pages 55777-55778, Volume 78, no. 176. No comments were received in response to this notice.

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 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 121VA19 "National Patient

Database – VA” and 57VA135 “Voluntary Service 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.

Information collected for these events is submitted by the respondent and their medical care provider. 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:

Respondents are VA patients who are participating in rehabilitative medical programs. Therefore, respondents may have medical diagnoses which inhibit their physical or mental capabilities. Such diagnoses may include: traumatic brain injury, amputation, spinal cord injury, multiple sclerosis, visual impairment, post traumatic stress disorder, schizophrenia and other cognitive disorders. Such diagnoses may significantly impact respondent burden. The following respondent burden estimates are based on a respondent with few physical or mental limitations.

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

National Disabled Veterans Winter Sports Clinic Event Application: checklist, registration (SF), medical clearance, ski information.

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	= Number of Hours
0924a,c,d	400	1	45		
0925(SF)	400	1	5		
TOTAL	400	1	50		333.3

Cross, Country Ski Instructor Personnel Application, National Disabled Veterans Winter Sports Clinic

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours

0924n	25	1	5		2.08
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Downhill Ski Instructor Personnel Application, National Disabled Veterans Winter Sports Clinic

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0924s	200	1	5		16.67

Volunteer Application, National Disabled Veterans Winter Sports Clinic

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0924t	15	1	5		1.25

National Veterans Wheelchair Games Event Application: registration, medical.

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	= Number of Hours
VA0925b	715	1	10		119.17

Volunteer Application, National Veterans Wheelchair Games

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0925d	2,000	1	5		167

National Veterans Golden Age Games Application: checklist, registration, waiver, medical, non-athlete checklist, non-athlete registration

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	= Number of Hours
VA0926a,b ,d,e,g,h	1000	1	20		333

Volunteer Application, National Veterans Golden Age Games

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0926j	800	1	5		67

National Veterans TEE Tournament Event Application: checklist, medical, fees

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	= Number of Hours
VA0927a,c,e	300	1	13		65

Volunteer Application, National Veterans TEE Tournament

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0927f	100	1	5		8

National Veterans Summer Sports Clinic Event Application: checklist, medical

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	= Number of Hours
VA0928a,c	120	1	7		14

Volunteer Application, National Veterans Summer Sports Clinic

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0928h	31	1	5		2.58

Surfing Personnel Application, National Veterans Summer Sports Clinic

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours
0928i	6	1	5		.50

Venue Personnel Application, National Veterans Summer Sports Clinic

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	Hours

0928j	16	1	5		1.33

National Veterans Creative Arts Festival Event Application: checklist, registration, medical, travel, family lodging, agreement, ticket request, media questionnaire

VA Form	No. of respondents	No. of responses	No. of minutes	÷ by 60	= Number of Hours
VA0929a,b,c,d,e,f,g,h	200	1	35		116.6

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 six therapeutic event applications. 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 \$25,330.88 (\$24.17 per hour¹ multiplied by the 1048.3 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.

¹ Bureau of Labor Statistics, Current Employment Statistics, Average Hourly Earnings (All Employees), December 2013.

Estimated costs to the federal government for this data collection include distribution and receipt of 5,928 applications is \$47,759.92. ($\$24.17 \text{ per hour}^2 \times 5,928 \text{ applications} \times 20 \text{ minutes} / 60 = \$47,759.92$)

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

Subsequent to the approval by the Office of Management and Budget for collection 2900-0759 in 2010, OPIA determined that several forms could be standardized, modified or eliminated to reduce the respondent burden and simplify this collection. This effort resulted in elimination of six distinct event registration forms and the proposal to use a standard registration form 0925 (SF) where possible for the events. Through this process, OPIA incorporated elements of the approved Media and News Release form (0924e, 0925c, 0926c, 0927d and 0928d) into the proposed standard registration form 0925 SF. This resulted in discontinuance of these five Media and News Release forms as well as discontinuance of the separate registration forms for four events. Currently, there are two events that have distinct registration forms due to the unique nature of those events (0926 and 0929). The net effect of proposed changes is a reduction in the respondent burden and a reduction in use of forms by eight (the five listed above, plus 0924b, 0927b and 0928b).

We have reduced the burden hour by eliminating separate event registration forms when possible and using 0925 SF as the standard registration form for some events. We also eliminated usage of the Media and Hometown News Questionnaire for five of the six events. Finally, we adjusted the number of respondents based upon actual attendance of events in 2013.

Additional changes to the forms are as follows:

0924a: deleted "10-10EZ Application" checkbox; deleted "Media and News Release" Checkbox; added "Consent for Use of Picture" checkbox

0924b: no longer in use, replaced with 0925SF

0924c: no changes

0924d: "Cardiopulmonary Review" checkbox moved to Physical Exam section

0924e: no longer in use

0924n: changed "Evening Telephone" to "Cell Phone Number"

0924s: changed "Evening Telephone" to "Cell Phone Number"

0924t: changed "Evening Telephone" to "Cell Phone Number"

0925 SF: deleted "Evening Phone" box; deleted "Branch of service" box; deleted "Paralyzed Veterans of America" section; deleted "Status and Classification" section; added "Are you attending with a caregiver" box; added "Military

² Bureau of Labor Statistics, Current Employment Statistics, Average Hourly Earnings (All Employees), December 2013.

Information” section; added “VA Healthcare” section; added “Emergency Information” section.

0925a: no longer in use, replaced with 0925SF

0925b: no changes

0925c: no longer in use

0925d: no changes

0926a: replace “Athlete Application 0926b” checkbox with “0925SF Registration” checkbox; deleted checkboxes for: “Media and News Release, Waiver, Alternate Activities, Authorization to release Records, Athlete Meals, and Sleep Study. Added “Consent for use of Picture” checkbox.

0926b: modified page 2 – event selection

0926c - no longer in use

0926d – no changes

0926e – no changes

0926f – no longer in use

0926h – no changes

0926i – no longer in use

0926j – no changes

0927a: deleted “Media and News Release” Checkbox and replace with “Consent for Use of Picture”

0927b: no longer in use, replaced with 0925SF

0927c – no changes

0927d – no longer in use

0927e – no changes

0927f – no changes

0928a - deleted “Media and News Release” Checkbox and replace with “Consent for Use of Picture”; added “For Veterans not Registered with VA” to 10-10EZ checkbox

0928b: no longer in use, replaced with 0925SF

0928c – added clinician e-mail box

0928d – no longer in use

0928h / 0928i / 0928j – all forms have been changed by deleting “Date of Birth” box; adding “Job Title” box, adding “Support with Travel and Per Diem” check boxes, adding “License or Certification” box.

0929a – delete “VA Form 10-10EZ Application” checkbox; delete “Any Applicable Fees” checkbox.

0929b: add “Use of Wheelchair for Long Distances” checkbox; add “Room Type” checkboxes

0929c – delete “Age” box; add “Cell Phone” box

0929d – New form for collecting travel arrangements – I did not see this form in the 12/8/2010 Notice of Approved Information Collection from OMB but it should have been part of the original 0929 series.

0929e – change hotel room options

0929f – add “Smoking / Credit Card” language

0929g – no changes

0929h – delete “VSO membership” checkbox; change “Number of years attending Festival” to “Is this Your First time” checkbox; reduce the number of questions on page 2 from 10 to 8.

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.

B. Statistical Methods

The data collection does not employ statistical methods. Data collected is for program planning, implementation and promotion and will not be aggregated.