

**Returning Our Veterans to Employment and Reintegration (ROVER):
National Surveys of Assistance Dog Providers and Veterans**

Request for Office of Management and Budget Review and Approval
for Federally Sponsored Data Collection

Section A

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A. Justification

A1. Circumstances Making the Collection of Information Necessary

Background

This Information Collection Request (ICR) is new and we are requesting approval for 2 years.

Under the Public Law 91-596 (Section 20[a][1]) (Attachment A), the National Institute for Occupational Safety and Health (NIOSH) is tasked with conducting research relating to occupational safety and health. The proposed survey will provide important information regarding returning veterans to employment.

On May 31, 2011, Senator Bob Casey (Chairman of the United States Congress Joint Economic Committee) released the report, *Meeting the Needs of Veterans in Today's Labor Force*. The report documents that, for 2010, the 2.5 million veterans who have served in the Global War on Terror (GWOT/Post-9/11; September 2001 to present) have a higher unemployment rate (11.5%) than both veterans of other service periods (8.7%) and the general (non-veteran) population (9.4%). The report further indicated that even as unemployment rates have improved (data as of April, 2011), post-9/11 veterans continue to have a higher rate of unemployment (10.9%) than other veterans (7.7%) and the general (non-veteran) population (8.5%). Further, a full 25% of post-9/11 veterans have a service-connected disability; that is, a documented disability (such as posttraumatic stress disorder, depression, traumatic brain injury, and loss of limb or vision) that is related to service in the United States Armed Forces. The current unemployment rate among post-9/11 veterans is unacceptably high, and it is predicted to only worsen as these veterans age and disabilities accumulate (as has occurred with veterans of the Vietnam War era).

Specifically mentioned in Senator Casey's report is the high rate of service-connected disability due to posttraumatic stress disorder (PTSD), which is reported to have increased three-fold between 1999 and 2010. In a RAND Corporation survey of about 2,000 post-9/11 veterans (Schell & Marshall, 2008), 19% of service members were found to meet criteria for PTSD or major depression, and 31% met criteria for traumatic brain injury (TBI), PTSD or major depression. In a survey of 1,100 post-9/11 veterans residing in West Virginia (Scotti, Majewski, Heady, & Tunick, 2008), 42% were found to meet screening criteria for PTSD and/or major depression, with higher rates of PTSD/depression being noted for those veterans who resided in more rural areas. Complicating these high rates of psychological disability is evidence that veterans, in general, have low rates of seeking services at Veterans Affairs Medical Centers (VAMC). In the West Virginia study, only 50% of the veterans reported any contact with a VAMC (slightly higher than the National rate of 40%), with lower rates of help-seeking seen among those with more intense symptoms (Scotti, Majewski, O'Reilly, Heady, & Tunick, 2008).

The take-home message echoed in each of the above reports is that post-9/11 veterans, particularly those exposed to combat in Operation Enduring Freedom (OEF; War in Afghanistan) and Operation Iraqi Freedom (OIF; War in Iraq), experience significant psychological impairment, including PTSD, depression, and anxiety, which impedes their reintegration to civilian life. Their ability to reintegrate into society and regain employment is also negatively

impacted by the lack of services available to veterans. The Casey Report calls for a concerted effort to assist veterans, especially those with disabilities, to transition back to work.

One contemporary approach for helping veterans with PTSD and other psychiatric impairments is using assistance dogs for psychological support. Reports of the positive impact of assistance animals are ubiquitous in the popular press, but few studies have been conducted on the use of assistance dogs to support veterans with psychological disabilities return to employment. Although statistics regarding veterans deployment history, exposure to traumatic events, status of physical and/or psychological disabilities, barriers and facilitators of returning to work, and level of functioning are all well studied and readily available, these factors have not been studied in association with the human-animal bond. The role factors such as pet ownership, the frequency and quality of human-animal interactions, and the psychological and physiological effects of human-animal interactions, are purported to be beneficial, but there is very little scientific evidence supporting these claims, which are mostly anecdotal. Furthermore, studies are needed to document the specific roles or functions of assistance dogs that might be useful, not only for helping veterans return to work, but also for reducing or ameliorating some of the symptoms of PTSD and other psychological barriers.

Recognizing the lack of research on this and related topics, the Department of Veterans Affairs is currently investigating the role that service dogs play in ameliorating symptoms of PTSD; however, this study is not expected to be completed for several years and it does not address issues specifically related to returning veterans to the workforce. Therefore, the current data collection is not duplicative of any existing data system or previous research study.

Two separate national surveys will be conducted. One survey will gather information from veterans about their military experiences, barriers and facilitators to returning to employment, the role that animals or pets play in their daily lives, and how dogs may help them return to work. The other survey will gather information from assistance dog providers regarding the services they offer to veterans with psychological disabilities and employment issues.

Although these two surveys are independent with different research questions, they are being proposed in the same package because the combined results will provide us with comprehensive information about risk factors and barriers associated with the reintegration and return to work by veterans, as well as the current services available to them, especially as they related to animal-assisted interventions. This information can only be obtained by targeting at least two different populations of individuals—providers of various services and veterans themselves. Instead of developing one survey that asks generic questions appropriately worded for both populations, we intentionally designed two separate surveys so that we can ask more specific, targeted questions. Assistance dog providers are the focus of this current project, but we hope to survey other providers of veterans surveys in future research studies.

Privacy Impact Assessment

Survey 1: Assistance Dog Providers

No information in identifiable form (IIF) will be collected during the survey. The hyperlink and/or internet address to the web-based survey will be made available only to contacts of the assistance dog providers; hence, the information will not be directed at children under the age of

13 years. Only data related to the provider's organizational structure and services will be collected. Even then, only data in the aggregate will be reported in future publications. No information in identifiable form (IIF) or sensitive information will be collected; the proposed data collection will have no effect on the respondent's privacy.

Survey 2: Veterans

To protect the privacy of veterans, no (IIF) will be collected from the survey. To further protect veterans' privacy, no lists or databases or records of individual veterans (i.e., their names, ID numbers, addresses, or other contact information) will be developed or maintained in connection with this study. Instead, information about the survey, including a hyperlink and internet address to the survey, will be disseminated to the general veteran population through general announcements or advertisements through various local, regional, and national veterans agencies. Announcements of the survey will not be directed at children under the age of 13 years. No individually identifiable information will be collected; the proposed data. Some information may be considered of a sensitive nature (e.g., history of drug abuse), but even then, only data in the aggregate will be reported in future publications.

Overview of the Data Collection System

Survey 1: Assistance Dog Providers

Although assistance dog providers in the United States is the population of interest, there is no comprehensive listing of these providers from which to sample. As such, a non-probability, convenience sample of providers will be identified using multiple strategies; including an internet search using multiple search engines; a search of organizations by NAICS (North America Industry Classification System) codes conducted using Hoover's Lead Builder, a marketing database; and existing lists of assistance dog providers available on the websites of assistance dog advocacy groups and accrediting organizations. Email addresses, phone numbers, physical addresses and contact names, when available, will be tabulated in Microsoft Access for all assistance dog providers found using these methods. In recognition that a convenience sample does not permit inferences to the population of providers, attempts will be made to establish as complete a list as possible to increase coverage by the survey.

All identified assistance dog providers will be sent an email that will contain a link to the survey (Attachment C1). The survey will be created, administered, and managed with Survey Monkey (surveymonkey.com), an online web-based survey tool. Survey Monkey allows users to create and customize survey questions, announce the survey to potential respondents by email, and manage and analyze the data collected from survey respondents. According to the Privacy Policy posted on their website, Survey Monkey considers survey data as property of the survey creator (user) and states that they "treat that information as private to the survey creator" except in connection with technical support, with the consent of the user who conducted the survey. The survey will take approximately 30 minutes to complete.

Survey 2: Veterans

This survey will target Veterans in the United States from all service branches and all war eras. They will be recruited with assistance from several Veterans agencies and organizations including:

- State Veterans Affairs Offices
- VA Centers of Excellence in Health Research and Development Service (located in various states)
- Office of the US Army Surgeon General
- National, state, and local Veterans advocacy groups (such as the Wounded Warriors Project)
- Office of Adjutant Generals of the National Guard (located in various states)

Contacts in these agencies will be sent an email containing the information regarding the survey (see Attachment D2) and asked to disseminate this information throughout their agency and to as many veterans as possible. Agencies will also be provided with a flyer to use in disseminating information about the survey (see Attachment D1). The flyer outlines the purpose of the survey, the topics to be covered, and the expected time to complete the survey (this survey will take approximately 60 minutes to complete).

Like the survey of assistance dog providers, the Veterans survey will be created, administered, and managed with Survey Monkey (surveymonkey.com). This survey will take up to approximately 60 minutes to complete. This is the worst-case scenario. The survey was designed to reduce the burden on each respondent as much as possible by presenting only questions that are applicable. The survey branches in many sections and, depending on each respondent's answers, skips some sections entirely. However, some sections of the survey include standardized, validated instruments that are not possible to shorten without compromising their validity. Respondents of either survey must have access to the internet to complete the survey; paper copies of the survey will not be provided. All assistance dog providers were identified through their presence on the world-wide web and thus will be recruited by direct email. In today's business climate, it is unlikely that service dog providers do not have a web presence and thus access to the internet. Veterans will be recruited indirectly through various veterans' organizations, many of which make resources, such as internet access, available to their members. Despite widespread internet access in the U.S. population, the exclusion of veterans without internet access to the internet is a limitation of this study.

Periodically during the survey period and at the conclusion of the survey period, the electronic files containing survey responses will be copied from the Survey Monkey site to NIOSH file servers by NIOSH personnel where it will be stored in a secure manner. At the conclusion of the survey period, all data files will be deleted from the Survey Monkey site.

Data collection partners include the following:

Items of Information to be Collected

Survey 1: Assistance Dog Providers

Assistance dog providers in the U.S. will complete a web-based survey for the purpose of collecting information about the services they provide for veterans. Assistance dog providers will report information concerning their agency structure, goals, target population, and services. They will also report information concerning services that focus on returning to work and specific strategies they have used to address issues related to return to work.

No individually identifiable information is being collected. Information will be collected on demographic variables of each organization and the services they provide to all clients, and Veteran clients, specifically.

Survey 2: Veterans

Veterans will complete a web-based survey for the purpose of obtaining the following:

- self-reported information about their deployment history
- exposure to traumatic events
- past and current pet ownership
- status of any psychological disability and level of functioning
- perceived barriers and facilitators to returning to work
- the role that animals or pets play in their daily lives and in issues related to return to work

Identification of Website(s) and Website Content Directed at Children Under 13 Years of Age

SurveyMonkey.com will host the survey. No information will be directed at children under the age of 13 years.

A2. Purpose and Use of the Information Collection

The purpose of these two surveys is to collect information from as many service dog providers and veterans as possible as a preliminary effort to gather information about the existing range of services that service dog providers provide to veterans with psychological disorders and, correspondingly, to capture the range of experiences that veterans with psychological disabilities have while transitioning from military to civilian work life. Furthermore, the veterans survey will collect information about the role that animals and pets may play in their lives interpersonally, emotionally, socially, and occupationally.

Results of this one-time data collection will be published in scientific journals and disseminated as brief reports to various stakeholders including other researchers, medical and allied health professionals, veterans organizations and advocacy groups, assistance dog providers and associated organizations, and veterans. As with any open web-based survey mechanism, the generalizability of the results will be limited, and should be considered preliminary. However,

because of the lack of information on these topics, the surveys will provide a useful heuristic function in stimulation in guiding further basic and applied research.

Furthermore, results may serve as an information resource for assistance dog providers, healthcare professionals, and policymakers as they work to develop, evaluate, standardize, or regulate animal-assisted therapies and interventions for veterans with psychological disabilities.

The information from these surveys will better inform assistance dog providers by offering: the

- the types of assistance that veterans need when reintegrating into society and the workforce.
- the percentage of veterans that could potentially benefit from a trained service dog.
- the breeds of dogs desired most by veterans.
- data on the dog breeds and training methods being used for veteran support by assistance dog organizations.

Results of the surveys will also be useful to healthcare workers, researchers, and policy makers. Healthcare workers can utilize this information to assist their veteran clients that are struggling to overcome barriers to reintegration and re-employment and will provide resources to those clients interested in obtaining an assistance dog. This information will also be valuable to researchers by highlighting the demand for assistance dogs in veterans' lives and the need for more evidence to support it. In addition, consenting assistance dog organizations will be included in a database of assistance dog providers that will be available for future research. This information may guide policy makers by supporting the need for new policies and funding for assistance dog training and placement services for veterans. Healthcare workers, researchers and policy makers may access this data at any time, as this is a one-time data collection procedure.

A2.1 Privacy Impact Assessment Information

Collecting this information is important to identify and evaluate existing services of assistance dog providers and the perceptions of veterans. This information will be used by health care providers, vocational rehabilitation specialists, researchers, and policy makers and other stakeholders to better meet the needs of veterans with psychological disabilities. This information will be shared in summary format only via publications in peer reviewed journals and online media.

A3. Use of Improved Information Technology and Burden Reduction

To maximize efficiency and reduce burden, a web-based survey is proposed for 100% of data collection. The survey will be constructed for easy respondent use, allowing the automatic administration of skip patterns, while maintaining a simple, seamless navigation. The majority of the questions are multiple choice, requiring a simple and easy mouse-click response. Web-based surveys have gained increasing acceptance as a research tool as they offer many advantages (Dillman, 2000), including:

- Cost effective (no postage or telephone bills required).

- Time effective (response speed faster due to ease of answering questions and navigation with skip patterns).
- All responses are automatically generated, allowing for minimal data cleaning and rapid tabulation of findings.
- Respondents can exit the survey at any time and resume where they ended.
- Less effort for respondents due to no mailing back survey.
- Lower rate of item nonresponse (Kwak & Radler, 2002).

A4. Efforts to Identify Duplication and Use of Similar Information

This study does not duplicate previous research. Searches of the professional, trade, and industry publications and websites do not contain comprehensive, aggregated information about assistance dog providers and the services they offer to their clientele or about how assistance dogs can help veterans with psychiatric disabilities return to work. Please find the searches performed and a summary of the results below.

A Google search for key phrases such as “assistance dogs *or* pets”, “service dogs *and* veterans”, and “employment *or* work” results in many individual organization websites that claim to train and provide assistance dogs to veterans with disabilities (e.g., assistancedogsinternational.com and azpowerpaws.org). However, there is no information regarding the extent to which assistance dogs, or pets in general, may assist a veteran with a psychiatric disability in returning to work. Furthermore, there is also no aggregate information available regarding assistance dog providers in the United States and the specific services they offer veterans with psychiatric disabilities. Also, information available online via Google is typically anecdotal or based on reports in the popular press as opposed to empirical or scientific in nature.

A scholarly search of the empirical literature was also conducted. The results of this search are tabulated below:

Date Searched	Dates Included	Database	Key Words	# of Results
9/11/2012	1950-2012	Web of Knowledge	human animal bond or human pet bond or bonding, human-pet/ or animal assisted therapy/ or animal assisted activity or therapy animal or therapy dog or therapy dogs or pet facilitated therapy or animal facilitated therapy or emotional support animal or emotional support dog or psychiatric service animal or psychiatric service dog	582, 314
9/12/2012	1950-2012	Web of Knowledge	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal	17,491
9/13/2012	,	Web of Knowledge	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or	1,347

			visitation dogs or visitation animal AND work	
9/14/2012	1950-2012	Web of Knowledge	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal AND stress	456
9/15/2012	1950-2012	Web of Knowledge	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal and stress and work	55
9/16/2012	1950-2012	Web of Knowledge	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal and stress and work and Veteran	1
9/17/2012	1946-2012	MedLine	human animal bond or human pet bond or bonding, human-pet/ or animal assisted therapy/ or animal assisted activity or therapy animal or therapy dog or therapy dogs or pet facilitated therapy or animal facilitated therapy or emotional support animal or emotional support dog or psychiatric service animal or psychiatric service dog	427
9/18/2012	1946-2012	MedLine	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal	34
9/19/2012	1946-2012	MedLine	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal and work	25
9/20/2012	1946-2012	MedLine	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal and stress	11
9/21/2012	1946-2012	MedLine	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal and stress and work	7
9/22/2012	1946-2012	MedLine	assistance dog or assistance dogs or assistance animal or service dog or service dogs or service animal or visitation dog or visitation dogs or visitation animal and stress and work and Veteran	2

One journal article was found using Web of Knowledge that included all search terms for different types of assistance dogs, stress, work, and veterans. The same article was found using the MedLine database, plus an additional article. Both articles found using all inclusive search terms were published in The United States Army Medical Department Journal in June 2012:

Krohl, W. (2012). Training the combat and operational stress control dog: An innovative modality for behavioral health. The United States Army Medical Department Journal, pg. 46.

Yount, R. A., Olmert, M.D., Lee, M.R. (2012). Service dog training program for treatment of posttraumatic stress in service members. *The United States Army Medical Department Journal*, pg. 63.

Both of these articles are descriptive accounts or narratives regarding programs that train dogs to assist individuals in combat or Veterans with PTSD after combat, respectively. Neither article offers aggregate information from multiple assistance dog training organizations in the United States. Nor does either article offer comprehensive information regarding the use of dogs or other animals to assist Veterans with PTSD return to work.

Esnayra & Love (2012) conducted a survey of mental health patients utilizing psychiatric service dogs. A small sample (n=71) of surveys were completed from members of Psychiatric Service Dog listserves. Results support the use of assistance dogs for individuals with psychiatric disorders. This survey is similar to the proposed data collection; however, the small convenience sample is problematic when interpreting the results (i.e., members of Psychiatric Service Dog list serves is a biased sample) and the survey does not include any information pertaining to assistance dog providers nationwide and the services they offer or to how assistance dogs can help Veterans return to work.

In addition to literature searches, experts in the fields of assistance dog training, Veteran rehabilitation, and epidemiology were consulted, and they too agree with the widespread lack of information in this area. Experts consulted included Colonel Perry Chumley, Director of Human-Animal Bond Programs, Office of the Army Surgeon General and Dr. Margaret Glenn, Department of Vocational Rehabilitation, West Virginia University.

To the best of our knowledge, there is no information at the local or national level that describes the demographics of assistance dog providers or the services they offer to their veteran clients. Similarly, there is no information about the impact that human–animal interactions may have on barriers for Veterans with psychiatric disabilities returning to work. Also, to the best of our knowledge, there is no organization or agency currently collecting such information.

A5. Impact on Small Businesses or Other Small Entities

Survey 1: Assistance Dog Providers

Most assistance dog providers are small businesses or organizations. Their one-time participation in the assistance dog provider survey is voluntary and will take approximately 30 minutes. They may exit the survey at any time. Furthermore, the questions have been held to the absolute minimum required for the intended use of the data.

Survey 2: Veteran Survey

Veterans' agencies may be small entities. Agency contacts will be requested to read the announcement email, take a follow up phone call, or further disseminate information about the survey within their agency using the flyer provided (Attachments D1 and D3).

A6. Consequences of Collecting the Information Less Frequently

Survey 1: Assistance Dog Providers

This request is for a one-time data collection. Without this survey, important information from providers of assistance animals about the services they provide to address veteran and employment issues will not be collected. Use of a cross-sectional design will help develop a profile of assistance dog providers and their services. This can be accomplished with a single data collection in which respondents report on past and present activities. A cross-sectional survey is most appropriate for the objectives and questions because this is an observational study focusing on one group (assistance dog providers). In addition, this study seeks to collect information on naturally occurring events and involves no intervention. There are no legal obstacles to reduce the burden.

Survey 2: Veterans

Use of a cross-sectional design will help develop a profile of veterans' attitudes and perceptions about return-to-work issues and the potential benefits of animal-assisted interventions. This can be accomplished with a single data collection in which respondents report on past and present activities and future expectations. A cross-sectional survey is most appropriate for the objectives of this survey because this is an observational study focusing on a general population of veterans. In addition, this study seeks to collect information on naturally occurring events and involves no intervention. Without this survey, important information from veterans with psychiatric disabilities about the role that pets play in their ability to return to employment and information from assistance dog providers regarding current attempts to address these issues will not be collected. There are no legal obstacles to reduce the burden.

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request fully complies with the regulation 5 CFR 1320.5.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

- A. A 60-day Federal Register Notice was published in the *Federal Register* on May 8, 2012, vol. 7, No. 89, pp. 27066-27067 (See attachment B). There were no public comments.
- B. Experts in the fields of assistance dog training (Parenti, Meade, Foreman), veteran rehabilitation (Scotti and Gross), research psychologist (Wirth) and epidemiology (Baughman) collaborated during the planning phases of this project. The survey content was reviewed and edited multiple times by all Project ROVER team members as well as outside individuals (Maxwell) for completeness and clarity. Assistance dog training experts confirmed the lack of similar survey data and the need for information regarding the needs of veterans in relation to assistance dogs. Similarly, veteran rehabilitation

experts substantiated the lack of data concerning the barriers and facilitators of veterans returning to employment. An expert in epidemiology was consulted regarding the length of the survey, appropriate ways to disseminate the survey, the most effective follow up procedures, and formatting to maximize efficiency of the survey. A research psychologist offered advice for the method of disclosure and measures to ensure the privacy of the survey participants, including the reporting of survey results in summary format only. All consultations occurred in 2011.

This information collection will occur only one time over a period of 6 months. The survey will not be changed once it is active. Therefore, continuous consultation with experts will not be necessary; however, consultation will occur on an as-needed basis to assist with data analysis.

The following table includes the individuals consulted in 2011:

Name	Title	Telephone #	Email	Agency
Richard Gross, Ph.D.	Associate Professor	304-293-5899	rgross@hsc.wvu.edu	WVU
Joseph Scotti, Ph.D.	Clinical Psychologist	304-906-9087	Joseph.scotti@mail.wvu.edu	WVU
Matt Wilson, Ph.D.	Division Chair Reproductive Physiology and Animal and Nutritional Sciences	304-293-1935	Matt.wilson@mail.wvu.edu	WVU
Megan Maxwell, Ph.D.	Applied Animal Behaviorist	540-818-8711	Meganmaxwell@petbehaviorchange.com	Pet Behavior Change, LLC.

A9. Explanation of Any Payment or Gift to Respondents

This study does not provide a payment or gift to the respondents. With the assistance dog provider survey and veterans survey, participation will be voluntary with no incentives for participation beyond self-motivation and no negative impacts for declining to participate. Therefore, we plan on taking the following steps to encourage participation and a high response rate in this research study:

1. Reduced response effort. The survey is web-based, allowing respondents to complete the survey at their leisure.

2. Stakeholders involved with this research project have indicated that this topic is of strong interest to assistance dog providers, veterans, and general public, and thus there is motivation to participate.
3. Follow up phone call will be conducted approximately 6 weeks after initial email to contacts in either the service dog organizations or various veterans agencies.

A.10 Assurance of Confidentiality Provided to Respondents

Survey 1: Assistance Dog Providers

Respondents will not be asked to provide personal information. Furthermore, no sensitive information will be collected. Although the proposed project will not be obtaining any personal information about an individual, respondents will be informed that their participation in the survey is voluntary and that results of the survey will be published only in the aggregate. Descriptions of the survey will clearly indicate that the survey will only include questions about facilities and the services their organization provides.

This data collection pertains to organizational information, not information about individuals or households. Organizational information, including email addresses and phone numbers, will be stored in a Microsoft Access database to facilitate the dissemination of the survey to multiple organizations. Organizations that have responded will be marked upon return of the survey, but their responses will not be linked to their particular agency. Response data will be collected and stored using an assigned code. There is no need for responses to be linked to the organization or individual that provided it, as all results will be reported in summary form only. Therefore, response data will not be linkable to respondents. Data will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law.

NIOSH members of Project ROVER will be responsible for assigning and maintaining codes and linking information. All data collected by Survey Monkey will be transferred to NIOSH, where it will be stored securely, with survey responses with code identifiers stored separately from the Access database of provider's contact information.

Consent is implied by the participants' completion of the survey. Participants will be informed up front that their participation in the survey is voluntary and that they are under no obligation to complete the survey in whole or in part. The respondent may exit the survey at any time by exiting the internet browser. (See Appendices for the text that will accompany the survey, any announcements, emails, or correspondences associated with the survey, and the survey questions.)

The email correspondence and the introduction to the survey have been written to provide potential participants with the information required in an informed consent form, but we are requesting a waiver of written informed consent.

A request for waiver of documentation of informed consent is being requested for this study, as it meets the requirements of 45 CFR 46.116(d) for a waiver of documentation.

The NIOSH Human Subjects Review Board (HSRB) Office has determined that the proposed survey, as described, does not involve human subjects. HHS Human Research Protections Regulation, 45 CFR 46.102 (F) defines a human subject as “a living individual about whom an investigator conducting research obtains data through intervention or interaction... or personal private information.” The proposed project will not be obtaining any information “about” an individual. The description provided indicates that proposed questionnaires only address questions about facilities and the services they provide. Effective 3/2/2012, The NIOSH HSRB Office as determined that this survey is a non-research activity and assigned it as Research Determination # HSRB 12-HELD-01NR (Attachment F). Therefore, the proposed survey of assistance dog providers does not require review by the NIOSH IRB.

Survey 2: Veterans

Although the proposed project will not be obtaining any personal information about an individual, respondents will be informed that their participation in this survey is voluntary and that results of the survey will be published only in the aggregate. Descriptions of the survey will clearly indicate the content of survey questions.

The survey is intended for veterans in the United States from all service branches and all war eras. Veterans will not be contacted directly. They will be recruited with assistance from several veteran agencies and organizations including each state’s Veterans Affairs Office, the VA National Centers for PTSD with locations in Vermont, Massachusetts, Connecticut, California, and Hawaii, regional VA Medical Centers, VA Centers of Excellence in Health Research and Development Service also located in several states, Office of the US Army Surgeon General, and other national, state, and local veterans advocacy groups such as Wounded Warriors Project. We will also work with the Office of Adjutant Generals of the National Guard in various states to help disseminate announcements of the survey. Data will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law. No PII is necessary because veterans will be recruited using the assistance of Veteran’s Agencies, who will provide the survey hyperlink to veteran members of their agencies. In this way, we do not need to know the names or contact information of respondents.

Some sensitive information regarding the veteran’s mental health status will be requested within the veterans survey. This information is necessary to categorize respondents on the basis of mental health status and to evaluate whether factors, such pet ownership and companionship, have positive, beneficial impact on their mental health symptoms, level of, and employment success.

Consent is implied by the participants’ completion of the survey. Participants will be informed up front that their participation in the survey is voluntary and that they are under no obligation to complete the survey in whole or in part. The respondent may exit the survey at any time by exiting the internet browser. (See Appendices for the text that will accompany the survey, any announcements, emails, or correspondences associated with the survey, and the survey questions.)

A request for waiver of documentation of informed consent is being requested for this study, as it meets the requirements of 45 CFR 46.116(d) for a waiver of documentation.

The CDC Human Research Protection Office (HRPO) has reviewed this protocol #6346.0 (HSRB 12-HELD-03XM), "Returning Our Veterans to Employment and Reintegration (ROVER) - A National Survey of Veterans" and found that this research activity is exempt under 45 CFR 46.101(b)(2). This determination is valid for a period of 3 years through August 19, 2015 (Attachment F1).

Privacy Impact Assessment Information

A. This submission has been reviewed by ICRO, who determined that the Privacy Act does not apply.

B. No IIF will be collected in either the assistance dog provider survey or the veterans survey; however, all raw data downloaded from the SurveyMonkey website and any summary data files created from the raw data files will be stored in dedicated project folders on secure NIOSH servers accessible only by authorized NIOSH project personnel.

C. A waiver of documentation of informed consent is being requested for these surveys, as they meet the requirements of 45 CFR 46.116(d) for a waiver of documentation. In these surveys, individuals affiliated with an assistance dog provider organization will respond to questions about the organization and the services provided, and veterans will respond to questions about deployment history, exposure to traumatic events, past and current pet ownership, status of any psychological disability and level of functioning, perceived barriers and facilitators to returning to work, and the role that animals or pets play in their daily lives and in issues related to return to work. Because the probability and magnitude of harm or discomfort anticipated by answering the questions are no greater than those encountered in daily life, the first requirement for a waiver is met. Respondents will not be answering questions that are sensitive or that might reveal personal information. Because this study involves no procedures for which written consent is normally required outside the research context, the second requirement for a waiver is also met.

Respondents, either individuals representing service dog providers or veterans, will be informed about the intended uses of the information collection first in the initial recruitment email (see Attachment C1 and D2) and then again in the introduction to the survey on SurveyMonkey.com (see Attachment C and D). Approximately 6 weeks after the initial email announcement to contacts of service dog providers, those contacts will receive a follow-up phone call (see Attachment C2). The initial email may be resent to them with their permission obtained during the phone call. Similarly, approximately 6 weeks after the initial email announcement to our contacts in various veterans agencies, those contacts will receive a follow-up phone call (see attachment D3), and the initial email may be resent to them with their permission obtained during the phone call. In both cases, if the contact person declines to participate or assist, they will be removed from the contact list and will not be contacted again regarding the survey.

D. No IIF will be collected in either the assistance dog provider survey or the veterans survey; however, respondents will be informed of the voluntary nature of their responses. This information will be provided in the recruitment email and in the introduction of the survey on SurveyMonkey.com (see Attachment C, C1, D, D1 and D2). There will be no effect on the respondent if they do not respond. Assistance dog providers that complete the survey will be asked if they would like their organization's contact information (not in any way linkable to survey data) published on a website as a service to veterans searching for assistance dog providers.

A11. Justification for Sensitive Questions

Survey 1: Assistance Dog Providers

There are no questions on the survey instrument that may be considered sensitive. The survey is completely voluntary and respondents may exit the survey at any time. Respondents are informed of their right to refuse participation in the introductory email and survey cover page.

Survey 2: Veterans Survey

This survey will ask potentially sensitive questions, such as the race/ethnicity of the respondent and the respondent's diagnosis. This demographic information is necessary to analyze any consistent patterns among veterans race/ethnicity and psychological diagnosis, as well as with level of attachment to pets and the need for assistance animals for specific populations of veterans. This information will be used to inform assistance dog training organizations of the needs of veterans obtaining assistance dogs. It will also be a step toward understanding the idiosyncratic needs of veterans based on various psychological diagnoses.

A12. Estimates of Annualized Burden Hours and Costs

Survey 1: Assistance Dog Providers

As described above (section A1.1), a non-probability, convenience sample of providers will be identified using multiple strategies; including an Internet search using multiple search engines; a search of organizations by NAICS (North America Industry Classification System) codes conducted using Hoover's Lead Builder, a marketing database; and existing lists of assistance dog providers available on the websites of assistance dog advocacy groups and accrediting organizations.

The internet search will identify organizations across the United States training the following types of assistance dogs: service dogs, service animals, therapy dogs, visitation dogs, recreation support dogs, social therapy dogs, guide dogs, hearing dogs, seeing eye dogs, eye dogs, sight dogs, mobility dogs, mobility assistance dogs, balance dogs, disability dogs, hearing dogs, hearing ear dogs, signal dogs, psychiatric service dogs, PTSD dogs, anxiety dogs, emotional support dogs, skilled companion dogs, home help-mate dogs, companion dogs, court dogs, medic alert dogs, seizure alert dogs, seizure response dogs, diabetic alert dogs, autism dogs, detection dogs, facility dogs, facilitated service dogs, 3rd party dogs, READ dogs, high schooled assistance dogs, emergency response dogs, search & rescue dogs, career dogs, and police dogs. The search by NAICS code using Hoover's Lead Builder will provide a listing of organizations coded as 812910 Pet Care (except Veterinary) Services.

Any assistance dog providers that do not have a webpage listing key dog terms described above, are not included in Hoover's Lead Builder, and are not listed by any advocacy groups or accrediting organizations will be excluded from the survey.

The information and the internet link to the web-based survey will be sent by email to approximately 1000 organizations. This number of organizations is estimated on the basis of a partially completed Google search that already identified hundreds of assistance animal providers. It is estimated that 700 will read the initial email or take the follow up phone call only. Depending on the level of involvement of each agency, activities associated with reading the email and responding to the email is estimated to take each respondent approximately 5 min and taking the follow up phone call is estimated to take an additional 5 min for a total of 10 min and a total burden of 117 hours (see Table A.12).

On the basis of similar surveys of small businesses or non-profit organizations, it is estimated that approximately 300 or 30% of the organizations will complete the survey. Therefore, the sample size is estimated to be 300 organizations. Pilot test data demonstrated that respondents should take approximately 20 minutes to complete the survey. During the pilot test, 9 student volunteers under the direction Professor Joseph Scotti in the Department of Psychology at West Virginia University volunteered to assess formatting, style, and phrasing. The average burden per response is 30 min which brings the total burden hours to 150- Announcement of the survey will be emailed to assistance dog providers using the contact information available. The announcement will contain a direct web link to the survey. The recipient will be asked to forward the survey to an individual in the organization who is qualified and authorized to answer questions about the organization.

Survey 2: Veterans

An estimated 100 persons in various veterans agencies across the US will receive email announcements of the veterans survey and a follow up phone call. The activities associated with reading the email, taking the follow up phone call, and distributing the flyer or forwarding the survey announcement to additional individuals is estimated to take up to 10 min.

Multiple measures will be taken to maximize response rates. First, a Project ROVER team member will contact all veteran agencies and assistance dog organizations approximately 6 weeks after the initial contact by phone as a reminder and to answer any questions or concerns (see Attachment C2 and D3). The original recruitment email will be resent at this time, if necessary. Date, time, and detail of all phone calls will be logged using an Excel database. If after contact, the veteran agency or assistance dog organization chooses not to participate in the research study, the organization or agency name will be dropped from the study sample database and no further contact will be attempted.

This survey will utilize a non-probability, convenience sample of veterans in the U.S. who complete the web-based survey. According the U.S. Census Bureau statistics for 2010 there were approximately 21.8 million Veterans and 1.1 million reservists across all service branches. With the assistance and cooperation of our partner organizations and agencies, announcements of the survey are expected to reach approximately 5% or 1.2 million of the total 24.1 million Veterans, reservists, and active duty personnel. Of those, we conservatively estimate that 5% or 60,000 will be *interested* in responding to the survey announcements. Despite current public interest in matters concerning assistance animals, not all of these individuals are expected to complete the survey. However, in a recent (unrelated) survey study of veterans residing in West Virginia only, responses were obtained from 1,000 (12.5%) individuals using similar recruitment procedures (Suh, 2012). In another similar study, the response rate of veterans was 10% (Scotti, 2008). Based on these examples, we conservatively estimate a 10% response rate from among the estimated 60,000 interested veterans from across all 50 states for a total number of 6,000 respondents (see Table A.12). For each respondent, the maximum time to complete the survey will be approximately 60 minutes.

The total estimated annual burden hours are 6,284.

Type of respondent	Form Name	No. of Respondents	No. of Responses Per Respondent	Average burden Per Response (in hours)	Total Burden Hours
Assistance Dog Providers who read the initial email and take the follow up	Assistance Dog Provider Recruitment Email	700	1	10/60	117

phone call only					
Assistance Dog Providers choosing to complete survey	Assistance Dog Provider Survey	300	1	30/60	150
Veterans Agency Contacts (persons in veterans agencies who read the initial email or take the follow up phone call)	Veterans Survey Announcement Email	100	1	10/60	17
U.S. Veterans	Veteran Survey	6000	1	1	6000
Total					6,284

Table A.12: Estimated Annual Burden Hours

A.12.B: Estimated Annualized Burden Costs

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
Animal Trainers ¹ (SOC 39-2011)	Assistance Dog Provider Survey	150	\$14.59	\$2,189
Animal Trainers ¹ (SOC 39-2011)	Assistance Dog Provider Recruitment Email	117	\$14.59	\$1,707
Veterans Agency Contacts (persons in veterans agencies who read the initial email or take the follow up phone call) ³	Veterans Survey Announcement Email	17	\$16.13	\$274
U.S. Veterans ²	Veteran Survey	6000	\$19.90	\$119,400
Total				\$123,587

¹This estimate was calculated using the U.S. Department of Labor’s Statistics on Occupational Employment and Wages, May 2012 (<http://www.bls.gov/oes/current/oes392011.htm>) for Animal Trainers across all industries with this occupation.

²This estimate was calculated using the U.S. Bureau of Labor Statistics, Current Population Survey, annual averages, 2009 (<http://www.bls.gov/opub/mlr/2010/07/art1full.pdf>). Hourly wage rate was determined from data on median weekly earnings (\$796) for male Gulf War-era II veterans

³This estimate was calculated using the U.S. Department of Labor’s Statistics on Occupational Employment and Wages, May 2012 (<http://www.bls.gov/oes/current/oes436014.htm>) for Secretaries and Administrative Assistants (43-6014).

A13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional cost burdens for respondents.

A14. Annualized Cost to the Federal Government

Costs for conducting the surveys are summarized in Table A.14. The total cost for this project is estimated to be \$128,428. The table below summarizes a breakdown of the estimated costs. There will be no new overhead, support staff, or construction required for the survey administration and data analysis.

Table A.14: Estimated Annual Burden Cost for Assistance Dog Provider and Veteran Surveys

Item	FY12	FY13	FY14	Total
NIOSH Personnel	\$28,782	\$29,645	\$30,534	\$88,961
Contractual:	\$12,009	\$12,302	\$12,656	\$36,967
Supplies	\$0	\$250	\$250	\$500
Travel	\$0	\$750	\$1,250	\$2,000
Annual estimate of federal costs	\$40,791	\$42,947	\$44,690	\$128,428

A.15 Explanation for Program Changes or Adjustments

This is a new data collection.

A16. Plans for Tabulation and Publication and Project Time Schedule

Clearance is being requested for 2 years, starting in the Summer of 2013 and continuing through the Spring of 2014. We plan to publish project results in peer reviewed scientific journals with a high impact number. Additionally, results will be presented at national, scientific conferences with high public visibility to research audiences. Results will also be disseminated to stakeholder groups via presentation and written reports. Finally, results will be disseminated to assistance dog providers in more publicly accessible formats such as trade shows and trade journals. Our projected timeline for the project is detailed in Table A.16 below.

Table A.16: Project Time Schedule

Milestone	Duration
Approvals	
Obtain IRB approval	1 month
Obtain OMB clearance	8-10 months
Data Collection/Analysis	
Distribution/marketing/follow up	1 month
Data Collection	12 months
Data Analysis	3 months
Dissemination	
Publication of reports	3 months

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

The display of the OMB expiration date is not inappropriate.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.