# Application for Assistance for Hiring and Retaining Nurses at State Homes VA Form 10-0430 2900-0709

### A. JUSTIFICATION

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

Public Law 108-422 authorized the appropriate expenditure of funds to assist State Veterans Homes in the hiring and retention of nurses and the reduction of nursing shortages at the State homes. The law requires that payments may be made to the state for a fiscal year subject to submission of an application. Therefore to assure that the funding request conforms to the limitations of the law and is consistent with regulatory requirement, the submission of an application is essential. VHA designed VA Form 10-0430, Application for Assistance for Hiring and Retaining Nurses at State Homes, for this purpose.

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 various state veterans homes will submit VA Form 10-0430 to apply for funds for recruitment and retention of nurses in their facilities. If the State Veterans Home (SVH) does not need funding for nurse recruitment and retention, there will be no need to fill out the application. The application is submitted to the VA by mail with the original signatures. The signed form will provide the State certification of compliance with VA requirements for funding for the recruitment and retention of nurses. VA will use this form to determine if the SVH meets the criteria for funding and that the amount of funding is appropriate.

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 described any consideration of using information technology to reduce burden.

The form can be accessed and downloaded at the One-VA Forms Site (<a href="http://www.va.gov/vaforms/">http://www.va.gov/vaforms/</a>) and the program office site (<a href="http://www.va.gov/geriatricsshg/">http://www.va.gov/geriatricsshg/</a>). At present, it is not cost effective to allow on-line submission of the low use form. Additionally, until VA has the capability to accept electronic signatures, signed form must be mailed to VA. The signed form will provide State certification of compliance with VA requirements for funding. VA will use this information to determine eligibility for funding and a determination of funding amount.

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 form does not contain any duplicate information. The information provided by individual State Veteran Homes is unique for each application and is not available to VA elsewhere.

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

As the form is submitted by state governments no small business or other small entities are impacted by the information collected. However, the burden is kept to an absolute minimum.

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.

This information is collected only when a state government/facility wishes to apply for funding for programs for recruitment or retention of nurses. The collection of information is required only when a State Veterans Home SVH needs assistance in funding nurse recruitment and retention programs. If this information was collected less frequently, VA would be unable to perform its statutory obligation to administer the 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 Wednesday, September 11, 2013, Volume 78, Number 176, and Page 55778. We received no comments in response to this notice.

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- and 30-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 statue, regulation, or agency policy.

## JUSTIFICATION FOR REDUCTION OF NURSING SHORTAGE IN STATE HOMES, Continued

Not applicable as the information requested is not patient specific or in anyway covered by the provisions of the Privacy Act.

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:

VA now projects a 3-year average of 15 applications annually. Each application requires approximately 2 hours, providing the requested information and completing the form for an annual total of 30 burden hours.

Year	No. of respondents	No. of responses	Minutes	Burden Hours	
1	20	1	120	40	
2	15	1	120	30	
3	10	1	120	20	
3YR TOTAL	45	1	120	90	
Annual Average	15	1	120	30	

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.

This request covers only one form.

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.

The average annual cost to the respondents for completing the form is \$960 (\$32.00 per hour x 30 average annual burden hours). \$32.00 is derived from the Bureau of Labor Statistics, Labor Force Statistics from the Current Population Survey, Medical and health services manager's weekly rate of \$1,280 which equates to an hourly wage of \$32.00. We do not require any additional recordkeeping.

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).

### JUSTIFICATION FOR REDUCTION OF NURSING SHORTAGE IN STATE HOMES, Continued

- a. There are no capital start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
  - c. There is minimal recordkeeping burden. The facility already has the data.
- 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.

	Salary	Annual Responses	Equals	Minutes	Divided by 60	Total
Review by GS 14/5	\$57.13	15	\$856.95	30	60	\$428.47
Review by title 38 nurse GS 12/10	\$47.16	15	\$707.40	30	60	\$353.70
						\$782.17

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

The first year of the program had an expected respondent rate of 100. The following 2 years projected a rate of 50 respondents. Upon completion of the last 3 years, the rate of respondents was much less than anticipated. The number of respondents for this OMB renewal is reduced to a 3-year average of 15 respondents. The burden has been adjusted to reflect the decrease that is expected for this collection, as per lack of respondents. Following a July 2, 2013 conference call with OMB and the sponsoring VHA Program Office, it was agreed that the data collection request should be renewed, pending revision of final rule RIN 2900-AM26, after which, this ICR is projected as a future request to OMB to discontinue the collection effort.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We do not plan to publish this data.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA will include both the OMB number and the approval expiration date on each page of the 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.

# JUSTIFICATION FOR REDUCTION OF NURSING SHORTAGE IN STATE HOMES, Continued

# B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.