

SUPPORTING STATEMENT

Correspondence Satisfaction Letter, FL 10-491 and Customer Modality Survey, 10-0151 OMB 2900-0761

A. Justification

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

In response to Executive Order 12862, the Veterans Health Administration (VHA) conducts both centrally and locally administered surveys to determine the level of satisfaction with existing services among VHA's customers. The surveys solicit voluntary opinions and are not intended to collect information required to obtain or maintain eligibility for a Department of Veterans Affairs (VA) program or benefit. The Health Eligibility Center (HEC) is constantly striving to improve the service we provide to our nation's Veterans.

In the year 2000, discussions with the Office of Management and Budget (OMB) and VA focused on ways to streamline the procedure while creating a process that ensures that survey integrity is built into local surveying efforts and minimizing the burden on the veteran patients. OMB approved the VA Office of Quality and Performance Local Veteran Satisfaction Surveys. This online website consists of a Library of Questions, which is a pool of at least 334 survey questions. The HEC online correspondence satisfaction "Survey of Your Experiences" and the "Customer Modality Survey" (VA Form 10-0151) information collections were developed consistent with the generic approval, by utilizing this pool of pre-approved questions for the forms development. The Customer Modality survey is initiated by the HEC Chief Business Office (CBO). The information entered into the forms will populate a database from which reports can be generated.

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.

VA wish to conduct local customer satisfaction surveys to advance VHA's progress toward the goal of improving customer satisfaction at the local facility level, as stated in the Executive Order. If the surveys were not conducted, local facilities would not have the specific local information needed to further practices that support the best possible customer-focused service. The HEC goal is to respond to Veterans correspondence, addressing their concerns in a concise and understandable manner. The HEC seeks approval for this information collection that will allow Veterans an opportunity to provide anonymous feedback on the survey process. HEC will use this feedback to improve the correspondence processes. The goal of the Customer Modality Survey is to implement a survey process that allows the organization to be proactive in caring for Veterans prior to them receiving services. The survey would focus on administrative process, for example some areas of focus are: 1) pre-registration support, 2) response time for phone inquiries, 3) disposition of staff, 4) claim processing, 5) patient statement and other responsibilities assigned to support staff. Also, the survey will afford CBO an opportunity to streamline administrative processes while improving the organization's customer relations through the identification of Veteran preferences. VA will use the information gathered to determine where and to what extent services are satisfactory, and where and to what extent they are in need of improvement. The

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information may lead to policy changes which improve patient satisfaction at the area impacted by the survey (local facility or network). In addition, voluntary customer surveys will not be used as substitutes for traditional program evaluation surveys that measure objective outcomes. To maximize the voluntary response rates, the information collections will be designed to make participation convenient, simple, and free of unnecessary barriers.

Baseline data obtained through the HEC Customer Modality Survey information collections will be used to measure performance in the specific areas of the Health Eligibility Centers. Each data collection will consist of the minimum amount of information necessary to determine customer needs and to evaluate performance. The areas of concern to VHA and its customers change rapidly and it is essential to have the ability to evaluate customer concerns in a timely manner.

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.

Form Letter 10-491 is an HEC correspondence letter that will be mailed to Veterans inviting them to participate in a survey that addresses the HEC's correspondence response and processes. The HEC Survey of Your Experiences is an online, anonymous survey designed for Veterans who correspond with the HEC with concerns regarding eligibility or income verification. Veterans will be able to access the survey and submit their responses electronically.

The Customer Modality Survey will be in one of two forms, based on the information to be collected. An internet survey will be used when the criteria for the survey indicates it is appropriate. Paper surveys will be used when it is determined the responses will be more likely submitted in the paper form. All surveys will be distributed through U.S. Mail or posted to VHA CBO website as required.

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 will use its internal review process at the Office of Quality and Performance (OQP) Durham Office to examine each information collection to prevent duplication of effort or redundancy in all information collected. The information to be gathered from the surveys as a whole is unique and not available from any other sources with the appropriate level of specificity required.

Local surveying (discontinued, 2900-0570) was designed to obtain patient perceptions of care at discreet levels of the organization (i.e. specific clinic, specific bed section, special program, etc.). VA does conduct nationwide surveys (2900-0712), which permit comparisons between various VA facilities, and with facilities in the private sector. However, the results of the nationwide surveys do not reach individual facilities for quite some time and they do not focus on specific small clinical areas. This prevents immediate changes to improve quality of care

JUSTIFICATION FOR NEW HEC SURVEYS, Continued

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

No small businesses or other small entities are impacted by this 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.

Most of the customer satisfaction surveys are recurring so that VHA can create ongoing measures of performance and determine how well the agency meets customer service standards. The burden consists only of that information which is essential to maintain the validity and support the goals of the Executive Order. The results of this information collection should lead to improvements in the quality of VHA service delivery by helping to shape the direction and focus of specific programs and services. If these surveys were not conducted or conducted less frequently, VA would not be responsive to the needs of the patient, be able to quickly correct quality of care issues or meet the needs of the veteran by quickly improving service.

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 special circumstances that require the collection of information to be conducted in a manner that is inconsistent with the guidelines in 5 CFR 1320.6.

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 September 16, 2013; Volume 78; Number 179; Page 57001-57002. VHA 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.

JUSTIFICATION FOR NEW HEC SURVEYS, Continued

VA, through the office of Quality and Performance, has expert staff available for advising, consulting, and working with individual facilities regarding local survey efforts. In addition, there are a number of private sector and educational institutions that concentrate on satisfaction surveying which are available as external resources to all agency employees. These are utilized whenever necessary. Every three years, when extension of the OMB approval is sought, 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.

There are no plans to provide payments or gifts to respondents.

10. Describe any assurance of privacy provided, to the extent permitted by law, for respondents and the basis for the assurance in statute, regulation, or agency policy.

These surveys are anonymous. In those rare instances when identities are collected, they will be carefully protected. Names and personal identifiers will be used to locate survey participants, when appropriate/and or necessary and will thereafter be stripped from any files as well as reports.

11. Provide additional justification for any questions of a sensitive nature, 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. Online Correspondence survey

Number of respondents is estimated at	107851
Frequency of response is annually	1.53
Number of responses is estimated at	165012
Average estimated response time is	Avg. 4 min.
Annual burden is estimated at	11,001 hours

b. Customer Modality Survey

Number of respondents is estimated at	114889
Frequency of response is annually	1.0
Number of responses is estimated at	218289
Average estimated response time is	Avg. 23.0 min.
Annual burden is estimated at	83677 hrs.

TOTAL = 222,740 Respondents 383,301 Responses 94,678 hours

JUSTIFICATION FOR NEW HEC SURVEYS, Continued

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).

- a. There is no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely.
- c. There are no anticipated capital start-up cost components or requests to provide information.

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.

VA will incur minimal internal administrative costs in developing, printing, and mailing the small low burden survey instruments, and in data analysis and reporting results. These costs will be approximately \$65,000.00 per year. These costs are easily outweighed by the benefits gained.

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14 of OMB 83-I

There are no program changes or adjustments.

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.

Differences in methods in both facilities and locations within a specific facility preclude meaningful aggregation and grouped analyses. Primary utility is for local quality improvement and will be posted to the HEC website.

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 seeks to minimize its cost to itself of collecting, processing and using the information by not displaying the expiration date. VA continues to seek an exemption that waives the displaying of the expiration date on the VA 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 such exceptions.