

**Supporting Statement for  
Vocational Rehabilitation and Employment (VR&E)  
Longitudinal Study Survey  
(2900-0786)**

**A. JUSTIFICATION**

This is a request for Office of Management and Budget (OMB) clearance to collect data for the **Vocational Rehabilitation and Employment (VR&E) Longitudinal Study** Survey. The first five years of this 20-year longitudinal study is being conducted for the Veterans' Benefits Administration (VBA) under contract with Westat. The VBA, within the U.S. Department of Veterans Affairs (VA), is seeking approval for primary data collection for this Congressionally-mandated study.

**1. Purpose and Authority**

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

**Overview.** On October 10, 2008, Congress passed the Veterans' Benefits Improvement Act (Public Law 110-389) to improve, enhance compensation and pension, housing, labor and education, and insurance benefits for Veterans. Section 334 of this law amended Chapter 31 by adding a 20-year longitudinal study requirement of Veterans who participated in the Vocational Rehabilitation and Employment (VR&E) VetSuccess program during fiscal years 2010, 2012, and 2014. This law also requires that the VA report to Congress annually on the long-term employment outcomes of Veterans.

In order to comply with the requirements of the law, the VA will need to conduct a study that includes a 20-year longitudinal survey of a random sample of VR&E participants who began the program in FY2010, FY2012, and FY2014. VR&E program participants eventually leave the program (through successful rehabilitation or voluntary/involuntary withdrawal from the program) and the VA would have no other source of information on long-term outcomes, other than to contact them directly to find out about employment and other outcomes, as far as 20 years after program enrollment.

The law also specifies that the VA report annually to Congress (by July 1) on sixteen specific data elements. While administrative data maintained within the VBA can be analyzed to report on some of the fifteen elements, for some of the data elements, no data sources currently exist within VBA administrative files that collect the required information. To collect the data needed to fulfill these annual reporting requirements, the VA is conducting the VR&E Longitudinal Study; the study will include an annual survey of a statistically valid random sample of three cohorts of VR&E participants (i.e., Chapter 31 participants who began a plan of services in FY2010, FY2012, and FY2014).

**Overall approach and goals.** The primary goal of the VR&E Longitudinal Study is to determine the longitudinal outcomes associated with community adjustment resulting from the VR&E program. The specific outcomes of interest in the mandate are (1) employment, (2) income, (3) home ownership, and (4) use of (need for) other program benefits, measured by receipt of Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI), unemployment benefits, or other public program benefits. As one's employment circumstances often changes over time, repeated measures of employment and community adjustment over time are typically more meaningful, providing a more accurate picture of the individual's employment situation. In addition to these outcomes, the

contributing factors of interest include the number of program participants, average number of months served on active duty, disability ratings, types of benefits received, number of Veterans enrolled in education or training programs, and the average number of visits to VA and non-VA medical facilities each year.

The study will employ three sources of data to measure the outcomes and contributing factors of interest: (1) administrative data currently residing within VBA administrative files, (2) self-reported survey data to be collected, and (3) existing administrative data from the Social Security Administration (SSA) through the use of data sharing agreements. Using data from all three sources will allow for more comprehensive analyses that will provide better understanding of the long-term employment outcomes of VR&E participants.

VBA administrative datasets have the advantage of including data elements that are available on an entire study cohort population (e.g., all VR&E participants who began a plan of services in FY2010, FY2012, or FY2014) for a given fiscal year. Similarly, inclusion of SSA administrative data will provide an objective data source for all cohort members receiving SSA benefits. However, the primary source of data that will be used to assess long-term outcomes of VR&E participants is the self-report survey data that will be collected annually.

Survey data will be collected from all cohort groups using a combination of web, mail, and telephone administration for the initial survey, as well as for the annual longitudinal followup surveys to be conducted for 20 years. While the primary focus of the survey data collection approach will be to collect the data as a web survey, a paper-pencil mail mode will be offered to those Veterans who do not complete the web survey, and computer-assisted telephone interviews (CATI) will be conducted with those Veterans who do

not complete the web or mail survey, or indicate they would prefer to complete the survey over the telephone.

**Data collection summary.** The Congressionally-mandated VR&E Longitudinal Study will include three main sources of data to measure the outcomes and contributing factors of interest: (1) VBA administrative data, (2) survey data, and (3) SSA administrative data through the use of data sharing agreements. Additionally, data extracted from VBA administrative files will be used to build the sampling frames from which the three cohorts of study participants will be randomly selected. These files will include relevant contact information for each cohort member, including mailing addresses, email addresses, and telephone numbers.

The main source of data that will be used to assess the long-term outcomes of VR&E participants is the longitudinal survey data. No current data sources exist that provide the information needed to assess the outcomes and factors specified in Section 334 of the mandate, thus initiating the need for this new data collection activity associated with the VR&E Longitudinal Study. Table 1 lists the specific measures that must be reported annually to Congress, and the respective data source associated with each measure. The table indicates that without the survey, the VA will not have the data needed to properly assess the long-term outcomes of VR&E participants, as required by law. The initial survey instrument will be applicable for the first three years of each cohort and subsequent surveys will be developed to address that fact that some of the questions may no longer be relevant and/or applicable.

Changes made to the survey were required since the initial survey development. Changes included adding the expiration date to the survey. Additionally, the most up to date program name was changed to reflect the

accurate naming of Vocational Rehabilitation and Employment Program on the survey.

The 30-day FRN indicated the change of adding the expiration date to the Survey, however the additional revision to correct the program name has now been added.



Table 1. Specific measures mandated by Section 334 of P.L. 110-389 to be collected for the VR&E Longitudinal Study

Domain	Measure	Source of Data	Formula	Survey Item
Employment	<ul style="list-style-type: none"> <li>▪ The average number of months such individuals were employed during the year covered by the report</li>   <li>▪ The average annual starting and ending salaries of such individuals who were employed during the year covered by the report<sup>a</sup></li> </ul>	<ul style="list-style-type: none"> <li>▪ Survey</li>   <li>▪ Survey, VBA administrative data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sum the number of months employed (during the past 12 months) for all respondents divided by the number of respondents.</li> <li>▪ First calculate the number of weeks employed during the past 12 months by multiplying the number of months employed by 4. Convert hourly rates to annual salaries (for respondents who report hourly wages) by multiplying the hourly rate by the number of hours worked per week, and then multiplying that product by the number of weeks employed. Convert annual rates to annual salaries (for respondents who report annual wages) by multiplying the annual rate by the number of weeks employed divided by 48.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Item 5</li>   <li>▪ Items 5, 5a, and 6</li> </ul>

## A. Justification

Domain	Measure	Source of Data	Formula	Survey Item
Income	<ul style="list-style-type: none"> <li>▪ The average annual income of such individuals</li>   <li>▪ The average total household income of such individuals for the year covered by the report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Survey</li>   <li>▪ Survey</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sum of gross income (during the past 12 months) for all respondents divided by the number of respondents.</li>   <li>▪ Sum of gross household income (during the past 12 months) for all respondents divided by the number of respondents.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Item 8</li>   <li>▪ Item 21</li> </ul>
Home ownership	<ul style="list-style-type: none"> <li>▪ The percentage of such individuals who own their principal residences</li> </ul>	<ul style="list-style-type: none"> <li>▪ Survey</li> </ul>	<ul style="list-style-type: none"> <li>▪ Count the number of respondents who report owning their principal residence. Divide that count by the number of respondents.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Item 22</li> </ul>



**A. Justification**

<b>Domain</b>	<b>Measure</b>	<b>Source of Data</b>	<b>Formula</b>	<b>Survey Item</b>
Use of other public program benefits	<ul style="list-style-type: none"> <li data-bbox="413 261 1062 326">▪ The types of social security benefits received by such individuals</li>   <li data-bbox="413 578 1062 643">▪ Any unemployment benefits received by such individuals</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="1083 261 1276 350">▪ Survey, SSA administrative data</li>   <li data-bbox="1083 578 1209 610">▪ Survey</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="1297 261 1646 643">▪ Count the number of respondents who report receiving SSI during the past 12 months. Divide that count by the number of respondents. Repeat formula for respondents receiving SSDI, Medicare, Retirement, and Survivor's or Dependent benefits.</li> <li data-bbox="1297 643 1646 922">▪ Count the number of respondents who report receiving unemployment compensation during the past 12 months. Divide that count by the number of respondents.</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="1667 261 1793 293">▪ Item 3</li>   <li data-bbox="1667 578 1793 610">▪ Item 9</li> </ul>

**A. Justification**

Domain	Measure	Source of Data	Formula	Survey Item
Contributing factors	<ul style="list-style-type: none"> <li>▪ The number of individuals participating in vocational rehabilitation programs under this chapter who suspended participation in such a program during the year covered by the report<sup>a</sup></li> <li>▪ The average number of months such individuals served on active duty<sup>a</sup></li> <li>▪ The distribution of disability ratings of such individuals<sup>a</sup></li> <li>▪ The types of other benefits administered by the Secretary received by such individuals<sup>a</sup></li> </ul>	<ul style="list-style-type: none"> <li>▪ VBA administrative data</li> <li>▪ VBA administrative data</li> <li>▪ VBA administrative data</li> <li>▪ VBA administrative data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Count the number of program participants who discontinued their plans of services during the fiscal year.</li> <li>▪ Sum the number of months served on active duty (for all program participants). Divide that sum by the number of program participants.</li> <li>▪ Count the number of program participants with a 0% combined disability rating. Divide that sum by the number of program participants. Repeat this formula for participants with combined disability ratings of 10%, 20%, 30%, 40%, 50%, 60%, 70%, 80%, 90%, or 100% and for participants with a memorandum rating.</li> <li>▪ Count the number of program participants who received a loan guaranty and the number of program participants who received disability compensation. Divide those counts by the</li> </ul>	<ul style="list-style-type: none"> <li>▪ N/A</li> <li>▪ N/A</li> <li>▪ N/A</li> <li>▪ N/A</li> </ul>

**A. Justification**

Domain	Measure	Source of Data	Formula	Survey Item
Contributing factors (cont'd)	<ul style="list-style-type: none"> <li data-bbox="413 261 1062 354">▪ The number of such individuals enrolled in an institution of higher learning, as that term is defined in section 3452(f) of this title</li>   <li data-bbox="413 483 1062 607">▪ The average number of academic credit hours, degrees, and certificates obtained by such individuals during the year covered by the report</li>   <li data-bbox="413 1149 1062 1242">▪ The average number of visits such individuals made to Department medical facilities during the year covered by the report</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="1083 261 1207 289">▪ Survey</li>   <li data-bbox="1083 483 1207 511">▪ Survey</li>   <li data-bbox="1083 1122 1207 1149">▪ Survey</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="1297 261 1646 477">▪ Count the number of respondents who report having been enrolled in an institution of higher learning. Divide that count by the number of respondents.</li>   <li data-bbox="1297 483 1646 1242">▪ Sum the number of academic credit hours, degrees, and certificates obtained (for respondents who report being enrolled in an institution of higher learning during the past 12 months and respondents who report receiving certificates or licenses during the past 12 months). Divide those sums by the number of respondents who report being enrolled in an institution of higher learning and the number of respondents who report receiving certificates or licenses during the past 12 months, respectively.</li>   <li data-bbox="1297 1248 1646 1430">▪ Sum the number of visits made to VA medical facilities during the past 12 months (for all respondents). Divide that sum by the</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="1667 261 1791 289">▪ Item 11</li>   <li data-bbox="1667 483 1824 607">▪ Items 11, 13, 14, 16, and 17</li>   <li data-bbox="1667 1149 1791 1177">▪ Item 19</li> </ul>

## A. Justification

Domain	Measure	Source of Data	Formula	Survey Item
Contributing factors (cont'd)	<ul style="list-style-type: none"> <li>▪ The average number of visits such individuals made to non-Department medical facilities during the year covered by the report</li>   <li>▪ The average number of dependents of each such veteran</li> </ul>	<ul style="list-style-type: none"> <li>▪ Survey</li>   <li>▪ Survey</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sum the number of visits made to non-VA medical facilities during the past 12 months (for all respondents). Divide that sum by the number of respondents.</li> <li>▪ Sum the number of dependents reported (for all respondents). Divide that sum by the number of respondents.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Item 20</li>   <li>▪ Item 23</li> </ul>

<sup>a</sup> Required data elements collected and maintained within VBA administrative files on all VR&E program participants

## **2. Use of Information**

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collected as part of the VR&E Longitudinal Study will be used by the VA to comply with Section 334 of P.L. 110-389 and conduct a 20-year longitudinal study of VR&E participants to assess their long-term outcomes. The advantage of a longitudinal study is that it allows one to analyze changes over time, providing insights into employment outcomes over an extended time period. This advantage is especially important in light of the fact that individuals rarely stay in their first position more than a few years.

The information gathered is intended to meet the policy analysis, evaluation, reporting, and planning needs of the VBA. In addition to fulfilling the Congressionally-mandated annual reporting requirement, the data will be useful in conducting ongoing policy analysis and assessing the effect of policy changes on outcomes. VR&E is anxious to explore the possibilities that this type of study will have on the continued improvement of the program. The annual reports will hopefully provide better insight on the participant characteristics and outcomes and will help VR&E determine areas for improvement and evolution.

## **3. Method of Collection**

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 their means of collection. Also describe any consideration if using information technology to reduce burden.

It is becoming more difficult to conduct telephone surveys as people move from traditional landline telephones and are less willing to accept calls on their cell phones. There is increasing evidence that web and paper questionnaires, using accepted contact procedures (e.g., followup mailings; Dillman, et al., 2009) can achieve response rates as high (or higher) than a telephone survey.

A web questionnaire, by itself, will not provide the coverage that a paper-mail or telephone survey will provide. There are many households that do not have ready access to the web and other that will not take a survey via the web. Westat's recent experience on the National Survey of Veterans found that only about 15 percent or 20 percent of Veterans were willing to complete the survey on the web (Cantor, et al., 2010). Consequently it is imperative for the VR&E Longitudinal Study to combine the use of the web with another mode, such as a telephone or paper survey, to maximize response rates and minimize respondent burden. Therefore, the VR&E Longitudinal Study will use a multi-modal data collection approach, combining web, mail, and telephone administration. Because participants can reside anywhere in the US (and even outside the US), in person data collection is not a cost effective method and therefore was not included in the study.

While the primary focus of the data collection approach will be to collect the data as a web survey, we will use scannable mail surveys with those Veterans who do not complete the web survey, and we will use computer-assisted telephone interviews (CATI) with those Veterans who do not complete the web or mail survey, or indicate they would prefer to complete the survey over the telephone. Implementing a mixed-mode data collection strategy increases the number of opportunities for potential participants to complete the survey and also allows for consideration of limitations and accommodations due to disabilities. Ultimately, VR&E wants to ensure the

survey is readily available, easily accessible, and minimally burdensome, thereby encouraging participants to remain engaged with the study for as long as possible.

### 4. Avoidance of Duplication

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 measures for the study have been carefully reviewed to eliminate redundancy and duplication. There is currently no in-depth data available on VR&E program participants, from the program itself or from other VBA programs, which would provide sufficient detail on the long-term outcomes of VR&E participants, especially for the specific outcome measures outlined in the law. Furthermore, since this study involves reporting on the outcomes of program participants who have not yet been identified (i.e., Veterans who begin a plan of VR&E services in FY2012 and FY2014), data that will be analyzed and reported on for these two cohorts is not yet available.

Each cohort will start out with participants that are currently in a rehabilitation plan with the VR&E program. However, since this is a 20-year study, participants will eventually leave the program and VR&E will have no other way of obtaining updated information on their progress, except by asking them directly. Thus, unless the agency conducts this survey, there would be no information that already available that could be used to comply with Section 334 of the mandate. There is no issue with duplication since the majority of the data points that are listed in the Public Law are not currently gathered by any VBA system. Any data points that can be extracted from VBA administrative files for an entire cohort population will not be duplicated in the survey and will be measured by administrative data only.

## **5. Small Business Impact**

If the collection of information impacts small businesses or other small entities (item 5 of OMB83-I), describe any methods used to minimize burden.

No small businesses will be included as respondents in this data collection effort; thus, the collection of information does not impact small businesses or other small entities.

## **6. Consequences of Not Collecting Information**

Describe the consequence 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.

Congress has mandated this study since they want to get a better understanding of the VR&E program, its benefits, and the areas that need improvement. Congress also required that the study include three cohorts of participants who began a plan of services in fiscal years 2010, 2012, and 2014; and that the VA report to them annually on specific outcomes and contributing factors of interest.

If the collection is not conducted, it will be harder to meet the requirements of the Public Law and it will be more difficult to obtain information from the first cohort of participants who have already been identified (i.e., Veterans who began a plan of services in FY2010). If the collection is conducted less frequently than once a year, it will be difficult to provide a yearly report to Congress that actually assesses changes in outcomes over time, and the effect the program has had on the lives of participants.

## **7. Special Circumstances**

Explain any special circumstances that would cause and information collection to be conducted in a manner:



## A. Justification

- requiring respondents to report information to the agency often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to 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 university of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The proposed data collection is consistent with 5CFR 1320.6 and therefore involves no special circumstances. Respondents will only need to provide a response once a year and will only need to submit answers to the survey, and does not require any additional copies of any document. Respondents will not need to retain any records of their survey questions or anything else as part of this study. All information provided will be private to the extent of the law and will only be gathered for the purpose of completing the yearly report to Congress on the long-term outcomes of VR&E participants.

## 8. Consultation Outside the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency'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 agency in response to these

comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or whose who much compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department notice was published in the Federal Register on February 6, 2014, Volume 79, No. 25, pages 7281-7282. There were no comments received in response to this notice.

### **9. Reimbursement of Respondents**

Explain any decision to provide any payment or gift to respondents other than reenumeration of contractors or grantees.

The survey materials for the FY 2013 Annual Report stated that the study participants who complete the survey will receive \$20 for their participation after each completed survey. This promised incentive helped to ensure that participants remain engaged in the study and motivated to continue participation. These incentives were discontinued for the future reports.

### **10. Assurances of Confidentiality**

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Respondents will be provided with a letter explaining the basis of this study, its importance, and their participation (. The letter will also explain that participation in the study is voluntary, and that participant responses will be kept private to the extent of the law. The letter will state that the data

collected will be used for research and statistical purposes, and any data reported will be in aggregate form only. More specifically, the letter will include the following assurance of confidentiality:

The information that you supply is protected by law (the Privacy Act of 1974, 5 U.S.C. 522a and section 5701 of Title 38 of the United States Code) and any data collected will not impact any current or future benefits you may apply for.

Data security and confidentiality of electronic information will be ensured through proven standardized security configurations and methods that include state-of-the art certificate services and other infrastructure features.

### **11. Sensitive Items**

Provide additional justification for any questions of a sensitive nature, as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the 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.

No questions on the survey are of a sensitive nature.

### **12. Estimates of Burden**

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the

variance. Generally, estimates should not include burden hours for customary and usual business practices.

- 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 Form 83-I.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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 13.

Based on previous experience with survey instruments with similar content, we estimate that it will take approximately 20 minutes for respondents to complete the annual surveys. Since the study covers a 20-year period, there are a total of 20 administrations across the full study period. The survey will be completed with 3,500 participants per cohort, for a total of 7,000 participants, for the first year of data collection which will include the initial survey for Veterans who began a plan of services in FY2010 (i.e., Cohort I) and FY2012 (i.e., Cohort II). Those same Veterans will be contacted again to complete the annual follow-up survey. The annual burden hours are 2,333.

- a. Number of Respondents: 7,000
- b. Frequency of Response: Annually
- c. Annual Burden Hours: 2,333 hours
- d. Estimated Completion Time: 20 Minutes
- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$55,992. (2333 burden hours X \$24.00 per hour).

### **13. Estimated Annual Cost Burden to Respondents**

Provide an estimate for 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).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected

useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs include, among other items, preparations for collecting information such as purchasing computer and software; monitoring sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) PRIOR TO October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no annual cost burden to respondents (beyond those shown in item 12 above) or recordkeepers resulting from the collection of information.

### **14. Estimated Annual Burden to Federal Government**

Provide estimates of annualized costs to the Federal government. Also, provide a description of the methods used to estimate cost, which should include quantification of hours, operational 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 may also aggregate cost estimates from Item 12, 13, and 14 in a single table.

The estimated cost of data collection efforts associated with the burden described in item 12 has been included in the cost associated with a Firm-Fixed Price contract that was recently awarded to Westat. There is no other

cost for this study. The cost for the first 3 years of the study is \$1,712,488.80 (\$570,829.60 annually).

**15. Program Changes in Burden/Cost Estimates**

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

There is no change in burden. Revisions were made on the initial survey to include the expiration date, accurate program name, and format.

**16. Plans/Schedules for Tabulation and Publication**

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.

A report of findings will be provided to Congress on a yearly basis. This will not be published but will be available to the public once Congress has reviewed and approved it. There will be no costs associated with publication since report will be available online for anyone to view. Data will be gathered every year and report will be submitted to Congress on July 1st for the next 24 years. Congress will provide an update if any changes to this schedule are needed. The table below presents a schedule that used to conduct data collection for the FY 2013 Annual Report to Congress.

Conduct initial survey data collection for VR&E Cohort I	September 24, 2012 - January 13, 2013
Receive VR&E Cohort II sampling frame from VBA	October 5, 2012
Conduct initial survey data collection for VR&E Cohort II	October 8, 2012 - January 27, 2013
Submit VR&E Annual Report 2013 (for FY2012) and convene briefing	March 1, 2013

This report will include information on study design, sampling methodology, participant characteristics, and their responses to survey questions to measure key outcomes of interest. Some of the data will be supplemented by the VBA administrative datasets. To the extent possible, we will produce bivariate and multivariate analysis to explore the relationship between participant characteristics and key outcome variables. In the area of exploratory analysis, we will implement full range of techniques needed for descriptive examination. We will examine frequency distributions and relationships between variables using a variety of numeric, tabular, and graphic techniques (i.e., univariate frequencies, cross tabulations, etc.).

We will conduct univariate analysis of survey responses to identify variables that contain excessive amounts of missing data or have highly skewed distributions. Data elements that exhibit such characteristics are flagged and may be candidates for either imputation to provide values for some that are missing or transformations to modify skewed distributions. We will follow the distributional review with a bivariate examination of pairs of data elements. Depending upon the level of measurement and the research questions, Westat might conduct correlation analyses (for two continuous variables), chi-square analyses (for two nominal variables, or analysis of variance (for the combination of continuous and nominal variables).

Beyond initial summaries of data elements, to the extent possible, we will implement other statistical approaches such as ANOVA and ANCOVA, regression modeling such as logistic and multinomial logistic regression, survival analysis, and factor analysis.

### **17. Expiration Date Omission Approval**

If seeking approval to not display expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the expiration date for OMB approval.

### **18. Exceptions**

## **A. Justification**

Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to Item 19 on OMB Form 83-I.