

JUSTIFICATION TEMPLATE

**OMB No. 2900-XXX
(TITLE), FORM XX-XXXX**

A. JUSTIFICATION

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

Legal authority for this data collection is found under 38 USC 521A that authorizes and mandates the collection of data during the grant application, implementation to include quarterly and annual reporting, and closeout phases of the adaptive sports grant. Mandated collection of data allows measurement and evaluation of the adaptive sports grant program, the goal of which is providing adaptive sport opportunities for disabled veterans and members of the Armed Forces.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

Current access to information collected for the purposes of administering the VA adaptive sports grant program is limited to VA employees whose official duties require such access for the purposes of program planning, implementation and evaluation. VA staffs accessing such information have received information security training and have been instructed on their responsibility to maintain confidentiality of the information. Adaptive sports entities will submit adaptive sports grant data reporting packages to the Department of Veterans Affairs' Office of Public and Intergovernmental Affairs for evaluation for selection and implementation of adaptive sports grants authorized by 38 USC 521A. The information will be used by VA to evaluate multiple criteria to confirm grantee eligibility, to score grantee proposals according to application criteria, and to ensure program efficacy and appropriate use of grant funds. The application information will indicate whether and to what extent a grant program is likely to be successful in meeting the program's intent for providing adaptive sports opportunities for disabled veterans and members of the Armed Forces. Adaptive sports grant recipients submit mandated reporting information in quarterly and annual reports for measurement and evaluation of the adaptive sports grant program. Based on prior reporting under the U.S. Paralympics Integrated Adaptive Sports Program, changes have been implemented to create new adaptive sports activities and adjust selection criteria to more effectively provide adaptive sports activities that meet the current needs and priorities for disabled veterans and members of the Armed Forces.

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.

The collection of information uses automated and electronic collection technique for permitting electronic submission of responses via web-based means. The basis for adopting this means of collection is ease of access, standardization, and reporting for adaptive sports grant recipients. As current reporting processes are web-based and use standardized forms and processes, improved information technology will not decrease the burden on the public.

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.

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VA does not have a similar collection of information for the application because the requirement to provide this information is created by the proposed rulemaking. There will be no duplication because similar information regarding veteran participation in adaptive sports activities cannot be used or modified for the purposes of this program. All adaptive sports grants are 1-year and data collected is provided only once based on the status and date within the adaptive sports grant implementation cycle. Because the data gathered at each point in program implementation is similar, duplication is further reduced by using one data input template: the 38 CFR 77 Reporting Template. If a grant recipient seeks to renew an existing 1-year adaptive sports grant, 38 CFR Part 77.4(b) authorizes renewal applications that reduce the duplication through use of information related to the applications implementation of current adaptive sports grant activities. Since all information reported reflects projected and current performance related to a grant application and package, the information is “real time” data and does not constitute duplication.

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

Every effort has been made to minimize the burden to small business by keeping questions simple and 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.

If the collection of data is not conducted or is conducted less frequently, the Grants for Adaptive Sports Programs for Disabled Veterans and Members of the Armed Forces cannot feasibly or legally be implemented. The data collection outlined in 38 CFR Part 77 is critical to determine which adaptive sports grant applications are feasible and meet the program’s goals and objectives. The quarterly and annual reporting requirements are necessary for program evaluation and measurement. In addition, all of these data collection requirements are mandated both under Federal grant management programs and under 38 USC 521A. There are no data collection requirements that are not mandated under directive from Congress and the White House.

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 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 few than 30 days after receipt of it.

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 will be published in the Federal Register on XXXXX (Volume XX, Number XX, Page(s) XXXXX).

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

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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 statute, regulation, or agency policy.

This information will not include Protected Health Information (PHI) or Individually Identifiable Health Information (IIHI).

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:

Respondents are adaptive sports entities who are participating in the adaptive sports grant program. The following respondent burden estimates are based on a respondent with a basic competitive adaptive sports grant.

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

Burden Hours					
VA Form 2900-XXXX	No. of respondents	x 7 response	x 120 minutes	÷ by 60=	Number of Hours
38 CFR 77 Report Template	150	1050	126,000		2100

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.

See chart in subparagraph 12a above.

c. **Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The estimated completion time for the grant application, four quarterly reports, annual report and final report (120 minutes average) is 14 hours (840 minutes). 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 \$336 (14 hours x \$24 per hour).

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).

There is no anticipated recordkeeping burden.

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.

38 USC 521A states that there is authorized to be appropriated \$8,000,000 for each of fiscal years 2014 through 2015 to carry out this program. Based on projected administrative costs and the number of grants to be funded, the Grants for Transportation of Veterans in Highly Rural Areas program would cost as follows:

Fiscal Year	FTE Cost (GS 13/2)	Space/IT Cost	Other Costs	Grant Funds to be Awarded	Total
2014	\$128,050	\$10,000	\$115,000	\$8,000,000	\$8,253,050
2015	\$133,673	\$10,000	\$115,000	\$8,000,000	\$8,258,673

FTE Cost

FTE cost is based on one (1) GS-13/2 with a salary rate of \$95,919 + 34% for benefits for a total of \$128,531. A 4% inflation rate was applied to the FTE Cost for FY2015. The purpose of this position is to serve as the National Program Coordinator for the Grants for Adaptive Sports Programs for Disabled Veterans and Members of the Armed Forces program and is dedicated to maintaining and improving adaptive sports opportunities for disabled Veterans and members of the Armed Forces through adaptive sports programs. The Program Coordinator will work directly with the Director of National Veterans Sports Programs and Special Events, Department of Defense adaptive sports programs, the United States Olympic Committee, National Governing Bodies, Veterans Service Organizations, adaptive sports entities, and field staff to guide implementation and administration of the Grants for Adaptive Sports Programs for Disabled Veterans and Members of the Armed Forces program.

Space/IT Cost

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VA maintains office space each fiscal year in the VA Central Office for the FTE. Additionally, IT costs for the FTE to perform duties are necessary. The estimated total for these costs is \$10,000.

Other Costs

VA assumes there will be additional costs each fiscal year in the amount of \$115,000. This additional cost will be used for the review of initial grant applications and annual review of renewal applications for the program. Additionally, the adaptive sports activities mandate integrated outreach programs, adaptive sports grant monitoring that includes diverse adaptive sports activities, and developmental activities including training and technical assistance and adaptive sports program enablers that require interaction between the VA and grant recipients.

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14 of the OMB form 83-1.

This is a new collection and all burden hours are considered a program increase. However, it should be noted that the adaptive sports subgrant recipients under the previous U.S. Paralympics Integrated Adaptive Sports Program authorized by 38 USC 521A performed the same data reporting requirements, but submitted to the United States Olympic Committee as the pass-through entity. Therefore, the burden hour changes are roughly an adjustment from a Non-Federal Entity to a Federal Entity.

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

VA does not intend to publish this data. However, data submitted by adaptive sports grant recipients will be compiled and overall program effectiveness will be included in the annual Report to Congress mandated by 38 USC 521A. The Report to Congress is developed after the adaptive sports grant recipients' annual reports are submitted for the grant implementation year and the Report to Congress is completed and submitted during the fiscal year following the grant implementation fiscal year.

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

VA is not seeking to omit the expiration date from the forms. Expiration dates will be placed on the forms upon receipt of OMB approval, and its associated expiration date.

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

B. Collection of Information Employing Statistical Methods

The data collection does not employ statistical methods.