

**Department of Veterans Affairs
Office of Small and Disadvantaged Business Utilization
CVE Site Inspection Survey
OMB 2900- New CVE Site Inspection**

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 (P.L.) 109-461 entitled “Veterans Benefits, Health Care, and Information Technology Act of 2006,” provides VA with unique authority for contracting with Service-Disabled Veteran-Owned Small Businesses (SDVOSBs) and Veteran-Owned Small Businesses (VOSBs). VA refers to this program as the Veterans First Contracting Program. In order to qualify for participation, eligible business owners must first be eligible to participate in the VetBiz Vendor Information Pages (VIP) Verification Program. The VA Veteran-Owned Small Business Verification Guidelines at 38 CFR § 74 establish the Verification process.

The Office of Small and Disadvantaged Business Utilization (OSDBU) Center for Verification and Evaluation (CVE) is required to measure the effectiveness and the processes taking place during the site inspections that is part of the Verification Programs. The site inspections are conducted by a third party. The purpose of the site inspections is to confirm whether the applicants are eligible to participate in the VetBiz VIP Verification Program according to 38 CFR § 74, specifically to determine if the Veteran applicant is the one who controls the small business concern. A risk analysis is used to determine which applicants receive a site inspection.

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 collected data will be used by OSDBU’s leadership to determine the effectiveness of CVE’s Site Inspection Program. It will also determine if CVE’s protocol is being followed by the third parties that are conducting the inspection, and how satisfied the SDVOSBs and VOSBs are with the site inspection process, which is intrinsic to the VetBiz VIP Verification Program. This is the first time that the proposed collection will take place, so no information has been used yet.

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.

An electronic survey will be emailed to SDVOSBs and VOSBs once they have been site inspected. The email message will include a link to the survey, which will be in compliance with the Rehabilitation Act, Section 508. Electronic submission of responses was

selected, as this is considered the quickest and most economical way to gather the required information. Electronic submissions allow business owners to submit responses at their convenience, from all over the nation. Over 90 percent of the questions are close-ended, which reduces the burden to participants.

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.

No information has been collected from SDVOSBs or VOSBs regarding the site inspections conducted as part of CVE's Verification Program. In addition to learning about what the applicants are experiencing during the site visit, this will also serve as an audit to the work conducted by third parties.

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

All participants in the Veterans First Contracting Program are small businesses. In order to ascertain their level of satisfaction and learn about opportunities to improve our processes, we must collect information from these small businesses. OSDBU will use IT to minimize burden, as well as close ended questions to diminish the length of time required from participants. A link to the electronic questionnaire will be provided via email, and small business owners will be able to fill it up and submit it electronically as well. i.

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.

OSDBU needs to collect this information to determine the level of satisfaction experienced by applicants with the Verification Program site inspections, identify areas for improvement, and confirm the adequacy of the process or protocol being used by the inspectors. Collected data will be used to streamline the process as appropriate. Given P.L. 109-461, the effectiveness of this program will turn into new set-aside contracting opportunities for SDVOSBs and VOSBs.

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.

A 60-day notice of Proposed Information Collection Activity was published in the Federal Register on August 29, 2014 and a 30-day notice was published on November 25, 2014. A comment was received stating that this information collection is a good idea.

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 instructions, 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.

VA OSDBU, Outreach Division corresponded with the CVE Verification Team, and it was found that the information has never been collected, but it is needed to measure the effectiveness of the program.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

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

The survey is anonymous, which is explained at the beginning of the questionnaire. No personally identifiable information is collected.

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. Site Inspection

Number of respondents is estimated at	125 per month
Frequency of response is annually	1
Number of responses is estimated at	1500 per year
Average estimated response time is	Avg. 5 min.

Annual burden is estimated at	125 hours per year
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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.

a. Site Inspection – Regular (Just site inspected)

Number of respondents is estimated at	100 per month
Frequency of response is annually	1
Number of responses is estimated at	1200 per year
Average estimated response time is	Avg. 5 min.
Annual burden is estimated at	100 hours per year

b. Site Inspection – Historical (Ever site inspected)

Number of respondents is estimated at	25 per month
Frequency of response is annually	1
Number of responses is estimated at	300 per year
Average estimated response time is	Avg. 5 min.
Annual burden is estimated at	25 hours per year

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 yearly cost to the respondents for completing these forms is \$2,766.25 (125 hours x \$22.13 per hour. Source: Department of Labor, Bureau of Labor Statistics, <http://www.bls.gov/news.release/ecec.nr0.htm>).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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 has a fixed cost contract for survey services. The table below shows the annual costs for collecting, analyzing and reporting results.

<u>Description</u>	<u>Monthly Cost</u>	<u>Yearly Cost</u>
Survey Vendor Rate per 4 Hours	\$850	
Survey Vendor Cost per year*		\$10,200
VA Administrative Cost -10 hours		\$ 500
Total Annual Cost		<u>\$10,700</u>

**Four hours of monthly work estimate*

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

This is a new data collection.

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.

Frequency and cross tabulations are the only analysis planned at this moment to be conducted. Some information may be posted at OSDBU's website (www.va.gov/OSDBU/).

This project is an ongoing one, where potential respondents will be reached after being Site Inspected. Information will be collected continuously, until the expiration date of the forms.

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 the expiration date for OMB approval on the form.

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.