

Development of a Historic Resources Educational Program

OMB: 2900-XXXX
VA Form: 40-10166

A. JUSTIFICATION

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

The National Cemetery Administration (NCA) is a federal agency authorized to provide a variety of burial and memorialization benefits for Veterans and other eligible individuals (Title 38, U.S. Code, Chapters 23 and 24). NCA manages 131 national cemeteries, 3.2 million gravesites marked with headstones and markers, memorials and monuments, lodges, ledgers and other records that illustrate the sacrifices of veterans. As a result of this statutory mission, NCA is the repository of an extensive collection of historic resources dating back to the Civil War Period. Its history office also works to preserve and interpret the memorials, monuments and ledgers in national cemeteries.

NCA manages these historic resources as an operational responsibility – it performs routine maintenance of gravesites, headstones, markers, memorials and lodges. NCA’s history office also works to preserve and interpret the memorials, monuments and ledgers in national cemeteries.

However, NCA has no well-defined program to share its historic resources with educators and the public and to memorialize Veterans and their sacrifices individually and as a collective over history. Current educational outreach efforts regarding Veterans cemeteries are generally limited to lesson plans about individual national cemeteries developed by the U.S. Department of the Interior’s *Teaching with Historic Places (TwHP)* program¹.

As a result, NCA is currently developing a Historic Resources Education Program to serve academic and non-academic stakeholders. These audiences include, but are not limited to, middle school and high school students and teachers, university students and professors, historic associations, veterans associations, libraries, and organizations that serve amateur genealogists.

To prepare for this initiative, NCA plans to conduct a Content Development effort. This effort will clearly define the target audiences, describe their needs and preferences, and enable NCA and its contractor to design an educational program that serves these audiences. The program will increase public access to historic resources in national

¹ <http://www.cem.va.gov/history/>

cemeteries and, in doing so, it will also increase public awareness of the legacy of the sacrifices of our nation's veterans.

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.

NCA and its contractor, American Directions Research Group (ADRG) will use the information derived from this effort to design programs for academic and non-academic audiences. This process will entail developing conceptual educational program frameworks, a detailed implementation plan, and lesson plans that can be used onsite at national cemeteries and offsite at schools, universities, libraries, museums, and other venues.

There is no current data collection effort.

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.

Survey

The survey will be conducted online, with some interviews collected by telephone when respondents indicate a preference for a telephone interview. Respondents will receive an email explaining the purpose of the survey and inviting them to participate. They will enter the survey by clicking on a link to the ADRG website. ADRG's *Webdirections* online/telephone survey platform enables the programming of complex surveys so that respondents are only asked questions that are relevant to them and provides customized survey flow, question text, and choices. The platform provides real-time backup to two servers and is kept highly secure through the encryption of information stored in ADRG's servers. The survey software is designed to be very convenient to use on a computer, tablet, or smart phone. Responses will be electronically submitted and automatically entered into the survey database.

Focus Groups

Automated, electronic, or mechanical forms will not be utilized for the focus group portion of this information collection. All consent forms and screeners will use hard copies, and data collected in focus groups will be audio recorded.

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.

The NCA Historic Resources Education Program is a unique program. There is no available information that addresses the questions that must be addressed in order to design a successful NCA Historical Resources Education Program.

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

Survey

This information collection will not have any impact on small businesses or other small entities. Respondent burden will be minimized in three ways: (1) participation will be entirely voluntary, (2) the survey will be designed to take no more than 15 minutes of the respondents' time on average, and (3) the survey will be administered online using an extremely user-friendly platform.

Focus Groups

This information collection will not have any impact on small businesses or other small entities.

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.

The data collection will be conducted only once. There are no technical or legal obstacles to reducing burden. If the survey or focus groups were not conducted, the individuals designing the NCA Historic Resources Educational Program would have limited information about the composition of the target audience or the educational needs and priorities of different groups of stakeholders.

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.

None of the special circumstances described above apply to this survey.

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 Monday, August 3, 2015 (Volume 80, Number 148, Page 46109). VA 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.

There is no need to consult with other agencies since the topic is unique to the NCA. Also, there will be only one data collection for the focus groups and the survey for this submission.

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

Non-response bias is a serious concern for survey research. The level of non-response bias is determined by two factors: (1) the level of non-response and the (2) degree to which non-respondents systematically differ from respondents. These factors are multiplicative. Since the product of any quantity multiplied by zero is zero, there would be no response bias if non-respondents were exactly like respondents to a survey. However, respondents are often different from non-respondents.

Aside from efforts to avoid bias in survey invitations and introductions, researchers have little or no control over differences between respondents and non-respondents. Thus, the most effective means of limiting response bias, is to minimize non-response.

Survey

The survey respondents are high-level professionals. We do not plan to offer them a monetary incentive for their participation in the survey.

Focus Groups

We plan to offer a small incentive of \$15 per respondent in recognition of the fact that they must travel to a central location for the session. This usually involves expense for transportation/parking and, in some cases, childcare so incentives are not seen as payment for services but as compensation for the sacrifices respondents make to participate.

For example, Groth (2010)ⁱ concluded that financial incentives increase participation and are a fair acknowledgement of the respondents' time and effort and not an unjust inducement. In this case, teachers and students will be required to read materials, prepare for the sessions and to be at their institutions at times they would normally be elsewhere.

Middle and high school students	\$15
College students	\$15
Teachers (middle and high school)	\$15
Professors	\$15

NCA Efforts to Assure Legal and Ethical Propriety

NCA has checked with legal and ethical officers within the Department of Veterans Affairs. At their request, we have eliminated the option of giving respondents the option of NCA making a donation to charity rather than a direct payment to the respondent.

Consistent with ethical and legal guidelines, no VA employees will be included in either the focus groups or the survey.

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.

The ADRG team will provide the following assurances at minimum:

1. Participation is voluntary.
2. Respondents will be told about the purpose of the effort and how their responses will be used.
3. The identity of individual respondents will remain private, unless the respondent expressly permits or requests such disclosure.

Although these assurances are not part of any law or regulations, they are best practices and are part of the Code of Ethics of such organizations as the American Marketing Association (AMA), the Association for Public Opinion Research (AAPOR) and the Council of American Survey Research Organizations (CASRO).

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 will be no questions of a personal or sensitive nature.

12. Estimate of the hour burden of the collection of information:

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

VA ICR	No. of respondents	x No. of responses	x No. of minutes	Total Minutes	Number of Hours
VA Online Survey 40-10166	200	1	15	3,000	50.00
Focus Group: College Students	12	1	105	1,260	21.00
Focus Group: Middle/High School Students	15	1	105	1,575	26.25
Focus Group: Middle/High School Teachers	15	1	135	2,025	33.75
Focus Group: College Professors	12	1	135	1,620	27.00
Total	254	1		9,480	158

Please note that the burden time also includes 15 minutes to fill out the consent form and 30 minutes to review materials and either 60 minutes (students) or 90 minutes (teachers and professors) to participate in the focus groups.

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 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 of the OMB 83-I.

Survey

Since the survey respondents will be high-level professionals, such as library and museum directors and executives with not-for-profit and for-profit organizations, we have used the mean wage for professional and business services. The cost of completing the survey is estimated at \$7.50 per respondent, based on a 15-minute survey at \$30 per hour²). We plan to complete 200 interviews, so the total

² Mean Wage for Professional and Business Services was \$29.74 as of February 2015. Bureau of Labor Statistics.

respondent cost to all respondents will be \$1,500. We do not require respondents to engage in any additional recordkeeping.

Focus Groups

The average cost of participation to each of the 15 middle- and high-school students is \$12.69 based on 1.75 hours at \$7.25 per hour. The cost for each of the 12 college student respondents is \$28.46 based on 1.75 hours at \$16.26 per hour. The total for the estimated 27 student respondents is **\$531.87**. The cost of participation to each of the 15 middle- and high-school teachers is \$67.50, based on 2.25 at \$30 per hour. The cost for each of the 12 professors is \$180.00, based on 2.25 at \$80 per hour. The total for the estimated 27 teachers/professors is **\$3,172.50³**. Thus, the total cost of participation for all groups is **\$3,704.37**.

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 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 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.

Survey

Please note that the following are one-time costs rather than annual costs.

Labor Category	Rate	Hours	Cost	Experience	Education
Project Manager & Subject Matter Expert	\$175.00	275	\$48,125.00	25 years	Doctorate
Programmer	\$115.06	24	\$2,761.44	7 Years	BA/BS

³ Rates for middle- and high-school students are based on the federal minimum wage of \$7.25. Rates for college students are based on the National Association of Colleges and Employers (NACE) 2013 Internship & Co-op Survey. Rates for middle and high-school teachers are based on the Bureau of Labor Statistics Mean Wage for Professional and Business Services. Rates for college professors are based on the Professional Staff Congress of the City University of New York contract hourly rate for Adjunct Assistant Professors.

Survey Center Manager	\$113.72	12	\$1,364.64	5 Years	BA/BS
Survey Center Supervisor	\$40.84	40	\$1,633.60	1 Year	BA/BS
Telephone Interviewer	\$28.03	250	\$7,007.50	0-1 Year	HS/GED
OTHER DIRECT COSTS:					
Sample List	\$1.25	4000	\$6,250		
TOTAL COST			\$67,142.18		

Focus Groups

Please note that the following are one-time costs rather than annual costs.

	Rate	Hours	Cost	Experience	Education
Project Manager/Subject Matter Expert	\$175	40	\$7,000.00	25 Years	Doctorate
CNY Project Manager	\$120	44	\$5,280.00	5-10 Years	BA/BS
Focus Group Moderator	\$240	44	\$10,560.00	5-10 Years	Masters
Field Director	\$120	16	\$1,920.00	5-10 Years	BA/BS
Field Coordinator/Recruiter	\$60	52	\$3,120.00	5-10 Years	BA/BS
Report Writer	\$105	30	\$3,150.00	5-10 Years	BA/BS
Note Takers/Field Support Staff	\$80	104	\$8,320.00	0-2 Years	BA/BS/HS
Senior Project Manager/Account Representative	\$126.95	48	\$6,093.60	5-10 Years	BA/BS
Senior Project Manager/Curriculum Services	\$126.95	73	\$9,267.35	5-10 Years	BA/BS
Production Manager	\$113.34	8	\$906.72	5 Years	BA/BS
Data Collection Coordinator	\$81.61	5	\$408.05	1-2 Years	BA/BS
OTHER DIRECT COSTS:					
Incentives for Respondents			\$810.10		
Payment to schools for use of facilities			\$600.00		
Estimated Travel Costs			\$3,842.38		
TOTAL COST			\$61,278.10		

Total Cost of the Effort (Survey Plus Focus Groups)

Please note that the following are one-time costs rather than annual costs.

Focus Groups	\$61,278.20
Survey	\$67,142.18
Total Cost	\$128,420.38

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

This is a new data collection request. All hours are considered an increase in burden.

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.

The purpose of this effort is to develop an educational program for the NCA. The information collected will be for internal use only and will not be published or publicly available.

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 display the expiration date.

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The survey data will be aggregated, tabulated, and used as the basis for a written report. Data will be displayed as counts and percentages. No complex statistical methods will be used.

ⁱ Groth, S.W. (2010) “Honorarium or coercion: use of incentives for participants in clinical research.”
Journal of the New York State Nurses Association.