

Date: August 10, 2016

To: Stephanie Tatham, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

Through: Cynthia Harvey-Pryor, Acting VA Clearance Officer
Office of Privacy and Records Management
Office of Information Technology (005R1B)

From: Patrick Littlefield,
U.S. Department of Veterans Affairs
Center for Innovation

Subj: Request for Emergency Clearance of Information Collection

VA is submitting a request for "Emergency Clearance" for the PRA package related to the Interim Final Rule AP72, "Veterans Employment Pay for Success Program," which published in the Federal Register on August 10, 2016 (2016-18721). The rule published as Interim Final without a prior Proposed rule, as approved by OIRA. This PRA action therefore requires submission to OIRA via an emergency clearance.

The collection of information is needed before the expiration of the standard public notice and comment periods established under the Paperwork Reduction Act (90 days total). The PRA documents are being submitted for OMB at the same time as the Interim Final Rule.

- VA cannot reasonably comply with the normal clearance procedures under the PRA because use of normal clearance procedures is reasonably likely to disrupt or prevent the collection and is reasonably likely to cause a statutory deadline to be missed, which is reliant upon a federal Notice of Funding Availability

This information is essential to the VEPFS grant applications, the form and manner of which the Secretary is describing in proposed regulations pursuant to 38 U.S.C. 3119, which authorizes the collection of data and the application requirements prescribed for the VEPFS grant program and are designed to ensure that VA can fully evaluate the ability of applicants to achieve the goals of the VEPFS Program

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- Public harm is reasonably likely to result if normal clearance procedures are followed. If this information was collected less frequently or not at all, VA would be unable to adequately assess applications or perform its statutory obligation to administer the program. To apply for a VEPFS grant, an applicant must submit to VA a complete grant application package, as described in the Notice of Fund Availability. Grants to such agencies to conduct or provide support for projects are designed to increase the resources and potential for accomplishing the rehabilitation of disabled Veterans.

The agency's Federal Register notice sets forth the request for emergency processing. VA is requesting a six month emergency approval.

Please contact Cynthia Harvey-Pryor with any questions at Cynthia.harvey-pryor@va.gov.

Sincerely,

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