

**SUPPORTING STATEMENT FOR
INQUIRY ROUTING AND INFORMATION SYSTEM (IRIS)
2900-0619**

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 Department of Veterans Affairs (VA) has a worldwide customer base that needs information and services 24 hours a day, seven days a week. Customer service is the key to establishing rapport and a customer following. The World Wide Web provides just such access. The Web provides a powerful medium to deliver information and services to Veterans, dependents, and active duty personnel worldwide. An online page that allows people to submit questions is beneficial to both the customer and VA staff. Customers are able to submit their questions at any time (unlike telephone inquiries) and receive answers more quickly than through standard mail.

The Inquiry Routing & Information System (IRIS) is an automated Commercial Off The Shelf (COTS) product developed by RightNow Technologies, a company sold to and now Oracle, for routing questions/complaints/suggestions that are sent to VA through the Contact the VA link on VA web pages. The first IRIS system was developed and implemented in 1999 and was a rudimentary system that performed a simple routing process. Sheer volume and the lack of customer and staff help tools began to overtake this system, and in 2002, it was replaced with a commercial product that was more sophisticated, robust and which provides a host of tools to help both veterans and VA staff alike. The product is customized to meet the needs of VA and has been received with enthusiasm by VA staff; VA participation in this program continues to expand and currently there are more than 479 routing destinations in the IRIS with involvement of more than 2215 VA staff members across VA, including staff at Veterans Benefits Administration, Veterans Health Administration, National Cemetery Administration, and numerous program offices. We expect continuing expansion of this system as the demand on the system from veterans and other persons using the Internet continues to increase.

The system is designed for all users of the VA Web site to submit questions, complaints, compliments, and suggestions online. They are able to select a topic based on the major VA business lines and other areas of possible interest. The significant rise in the use of the Internet as a tool of choice clearly demonstrates the need for a web-based solution to the number of contacts coming to VA via the VA website. In addition, VA call centers use the IRIS to create inquiries for those telephone-received inquiries that cannot be answered in real time during the calls. As of February 2016, the number of inquiries coming through the IRIS monthly is approximately 33,000 per month and rising due to the expansion of benefit-eligible entitlements, the growing number of veterans needing services, and the use of the system by call center staff to enter inquiries on behalf of callers. The number of hits to the Frequently Asked Questions Knowledge Base inside the IRIS is approximately 400,000 per month. The numbers alone clearly demonstrate the utility and necessity of the IRIS.

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.

Information provided by IRIS inquirers is used to provide responses to specific inquiries that are received by VA via VA's web site or via the VA call centers. Information submitted goes into the IRIS secure database and is used to locate claims information, benefits information or other data that responders use to provide adequate responses to inquiries about benefits received, pending claims, medical care issues, etc. The IRIS is System of Records with OMB permission to collect data and to

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operate. Once an inquiry has been resolved and has been inactive for more than 36 months, it is automatically archived for another five years. The IRIS can be summarized as a quick-turnaround, rapid question-answer utility. It does not provide applications to veterans or serve as a conduit for patient data, etc. Other official mechanisms exist to serve those purposes.

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.

IRIS permits users of the VA Web site to submit their inquiries to the VA electronically using a standard format by linking on the "Contact VA" link on the VA homepage. The system automatically delivers the inquiries to the appropriate VA staff personnel based on the topics and subtopics selected by the users. Therefore, VA has met the requirements of the Government Paperwork Elimination Act for this data collection.

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 system is a One-VA approach to answering and tracking inquiries so that each administration will not have to develop its own system and is accessed by clicking on Contact VA on the department home page and all other VA homepages. There is currently no other comprehensive system that collects and tracks this information on a department-wide basis. The IRIS crosses all administrations and business lines in VA and also includes many program offices.

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

No small businesses or other small entities are impacted by this information collection.

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 number of inquiries an individual makes controls the frequency. The Internet has become the method of choice for thousands of Veterans and others who wish to communicate with VA. Therefore, VA would not be responsive to the needs of its customers if information were collected less frequently or in such an efficient manner.

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.

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There are no such special circumstances. The information is collected only when the users of the VA Web site or VA call centers freely initiate the contact; the VA receives these contacts from various individuals on a daily basis and should respond within five workdays to the inquiries. We do not limit the number of inquiries an individual can make.

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 /Vol. 81, No. 192 / Tuesday, October 4, 2016, page 68502. We 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.

No efforts have been made to consult with veterans or representatives beyond the 60- and 30-day Federal Register notice.

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.

Links are provided to the VA's Privacy & Security Notices, as well as the Paperwork Reduction Act. The IRIS system (SOR Number: 151VA005OP6) resides on a Secure Socket Layer and provides a secure mechanism for communicating with VA. VA responders have unique usernames and passwords to access the IRIS system to be able to respond.

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 asked that pertain to sexual behavior, religious beliefs or other matters that bear no impact on information, activities or services from VA.

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

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33,000 respondents per month x 12 months = 396000 x 10 minutes/60 =66,000 hours.

**UPDATE: Previous figures were 648,000 x 12 responses = 7,776,000 x 10 min. = 7,776,000 / 60 = 1,296,000 hours; much of that traffic was due to the expansion of VA benefits. Number of inquiries is stable at approximately 33000 per month.

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 only one system.

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 cost to the respondents for completing these forms is \$594,000 (33,000 x \$18.00 per hour). We do not require any additional recordkeeping. Value per hour is based on U.S. Department of Labor, Bureau of Labor Statistics, May 2015, Occupational Employment and Wage Estimates statistics, median national average wage for category 43-9022 Word Processors and Typists. This category describes the use of a computer to type/enter letters, reports, or forms, or other material. The activity relevant to the IRIS is the requirement to enter contact information and type in the inquiry on the "Ask a Question" form submitted via the Web on the Department's Contact Us link on the VA web site.

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).

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.

The annual cost of the contract to obtain this data is \$4,691,285.01 which is the current annual maintenance and hosting fee for the use of this application and the licenses for the VA responders. The number of inquiries can fluctuate from month to month and the number of responder groups in VA continues to grow. As VA adds features and licensing as the system grows, the annual maintenance costs rise.

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

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We anticipate any changes to the current annual burden hours to occur because of the continuing rise in the use of the Internet to communicate with the agency. The amount of time per inquiry should remain at the ten minute completion time estimation. Costs increase yearly with the host vendor as prescribed by contract. Previous figures were 1,296,000 hours; for which much of that traffic was due to the expansion of VA benefits. The number of inquiries is stable at approximately 33000 per month.

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.

There are no plans to publish the results of the information collected.

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

We do not seek approval to omit 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

No statistical methods are used in this data collection.