

**VETERANS EMPLOYMENT PAY FOR SUCCESS (VEPFS) GRANT PROGRAM  
APPLICATION FOR PAY FOR SUCCESS GRANT  
VA FORM 10193**

**OMB FORM 2900-0847**

**A. JUSTIFICATION**

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

Section 3119 of title 38, United States Code, authorizes the Secretary of Veterans Affairs (Secretary) to make grants to or contract with public or nonprofit agencies, including institutions of higher learning, to advance “the knowledge, methods, techniques, and resources available for use in rehabilitation programs for veterans.” Section 3119 specifically authorizes the Secretary to make grants to such agencies to conduct or provide support for projects which are “designed to increase the resources and potential for accomplishing the rehabilitation of disabled veterans.” VA has codified these provisions in its regulations at 38 CFR 21.390 Rehabilitation research and special projects. The purpose of the VEPFS program is to provide one or more grants to fund Outcomes Payments for one or more PFS projects that seek to improve employment outcomes for Veterans with a Service-connected Mental Health Disability. Applicants are required to submit VA Form 26-0967, Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion and VA Form 26-0967a, VEPFS Criteria and Responses. Applicants are also required to provide statements addressing scoring criteria for grant awards as part of their application. Lastly, applicants are required to submit Standard Form 424, *Application for Federal Assistance*.

The Interim Final rule was published on Wednesday, August 10, 2016 (81 FR 52770-52777).

**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.**

Public or nonprofit agencies may submit this information to complete an application for the VEPFS Grant program. Applicants may either obtain printed copies of the forms or electronically download the required forms. These forms and other required statements are then completed and the applications submitted to VA electronically through Grants.gov. The signed forms provide certification of compliance with VA grant requirements. VA will use all information submitted by applicants, including the SF 424, VA Form 26-0967 and VA Form 26-0967a.. The information will be used by Veterans Affairs VEPFS program representatives in deciding whether an applicant meets the requirements and satisfies the scoring criteria for award of VEPFS grant under 38 U.S.C. 3119.

**Application for VEPFS Grant:**

This information is needed to a VEPFS grant to eligible entities. Legal authority for this data collection is found under 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.

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. (VA would publish a Notice of Fund Availability in the Federal Register identifying such items as the location for obtaining supportive services grant application packages; the date, time, and place for submitting completed supportive services grant applications; the estimated amount and type of funding available, such as the amount of funds available for VEPFS grants; the length of term for grant performance; and other information necessary for the VEPFS grant application process as determined).

Compliance Reports for VEPFS Program: This information collection will be required to ensure grantees are complying with all program requirements set forth in their grant agreements. As this is a new program, there has not yet been any such collection in the past. Respondents will be required to submit quarterly reports that provide project performance updates and related cost expenditures. Up to 10 grantees will be selected per grant program and quarterly reporting will be required.

**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.**

Applicants for VEPFS grant will submit their applications to the Secretary via Grants.gov. Grants.gov provides a centralized location for federal agencies to post discretionary funding opportunities and grant seekers to find and apply for federal funding opportunities. Electronic submission through this centralized website will reduce the burden on applicants and VA and will improve consistency in submissions. VA will use the information contained in Standard Form 424, VA Form 26-0967 and VA Form 26-0967a. These forms will be accessed and downloaded on Grants.gov (<http://www.grants.gov>). These signed forms will provide applicant certification of compliance with VA grant requirements. VA will use this information to award VEPFS grants.

**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.**

Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or agency which maintains the necessary information, nor is it available from other sources within our Department.

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

The collection of information will affect public or non-profit entities that chose to submit applications for the VEPFS grant. This information collection is limited to determining whether, and to what degree, the applicant meets the requirements used in the award process of VEPFS grant. Applicants may only apply for one grant per year, and once per project. Therefore this information is considered to only be collected one time, and may be submitted electronically, which lessens the burden on any small businesses or other small entities who choose to submit applications. Every effort is being made

with the Compliance Reports for the VEPFS grant program to minimize the burden to small businesses by keeping reporting requirements simple and to a minimum while still conforming to program requirements. Thus, an insubstantial number of small entities will be affected by the information collection process and, accordingly, there will not be a significant economic impact on such 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.**

This information is collected only when a public non-profit entity wishes to apply for a VEPFS grant. 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. The collection of information for the grant application (38 CFR 21.445) is generally conducted only one time, at the time of application submission. Compliance reporting under 38 CFR 21.447(a) (1) and 21.448(a) will be conducted on a quarterly basis and will be kept to a minimum. 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.

Per § 21.448(b) and § 21.447(a)(2) and (3), VA may request additional reporting if necessary to fully and effectively assess program accountability and effectiveness a manner and timeframe that VA specifies in the Terms and Conditions of the grant agreement. VA will seek PRA approval for this collection of information under these regulatory provisions in the future.

**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 to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

**8. 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. 213, Thursday, November 3, 2016, Page 76699. VA received no public comments.

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

No payment or gifts to respondents will be made under this collection of information.

**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.**

Information on this data collection will become part of a system of records which complies with the Privacy Act of 1974. This system is identified as "Veteran, Patient, Employee and Volunteer Research and Development Project Records-VA (34VA12)" as set forth in the Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html>

**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.**

No sensitive questions appear on the form.

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

Estimate of Information Collection Burden

38 CFR 21.445 Grant Applications.

- a. Estimated number of respondents: Up to 25
- b. Estimated frequency of responses: one-time collection, may repeat in future years (subject to PRA approval) if new applications are solicited
- c. Estimated average burden per response: 80 hours
- d. Estimated total annual burden of response: 2000 hours
- e. According to the U.S. Bureau of Labor Statistics Mean Hourly Earnings, the cost to respondent is \$23.23, making the total cost perrespondents an estimated \$1,858.40 (80 burden hours x \$23.23 per hour). The cost of the total annual burden for all respondents is estimated to be up to \$46,460.00 (up to 25 respondents x 80 burden hours x \$23.23).

(Source: May 2015 BLS National Occupational Employment and Wage Estimates, Code: 00-0000, All Occupations: [http://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](http://www.bls.gov/oes/current/oes_nat.htm#00-0000))

**38 CFR 21.447(a)(1) and 21.448(a) Quarterly Fiscal Compliance Reports.**

- a. Estimated number of respondents: Up to 10
- b. Estimated frequency of responses: 4 quarterly reports for the life of the grant, will increase in future years (subject to PRA approval) if new applications are submitted
- c. Estimated average burden per response: 1 hour
- d. Estimated total annual burden of reporting and recordkeeping: 4 quarterly reports for up to 10 respondents (40 hours total)
- e. According to the May 2015 U.S. Bureau of Labor Statistics Mean Hourly Earnings, the cost to respondent is \$23.23, making the total cost to per respondent an estimated \$929.20 (40 burden hours x \$23.23 per hour). The cost of the total annual burden for all respondents is estimated to be up to \$9,292.00 (up to 10 respondents x 40 burden hours x \$23.23).

**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).**

The record keeping costs are expected to be nominal (minimal electronic storage of ordinarily retained business records) and have not been quantified.

**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.**

Estimated Annualized Cost to the Federal Government

<u>\$6043.75</u>	Estimated VA processing cost for 25 responses x 5 hours x \$48.35 per hour (average Veterans Affairs CO salary)
<u>\$0</u>	Printing Costs
<u>\$6043.75</u>	Total estimated cost to Federal Government

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

There are no burden changes.

**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.**

Information collection is not for publication purposes.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We are not seeking approval to omit the expiration date for OMB approval.

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

This submission does not contain any exceptions to the certification statement.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

No statistical methods are used in this data collection.