

(2900-AP83)
Ecclesiastical Endorsing Organization

OMB FORM 2900-XXXX

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 information is needed to establish that religious organizations that wish to provide ecclesiastical endorsements of individuals who seek employment as a VA chaplain or who seek to be engaged by VA under contract or appointed as on-facility fee basis VA chaplains under 38 U.S.C. 7405 meet eligibility requirements. The authority for this collection is 38 U.S.C. 501(a), 7304, and 7405.

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 information will be submitted by religious organizations wishing to endorse applicants for VA Chaplaincy. The information is used to establish that requesting organizations meet eligibility requirements. It is also used to ensure that VA accepts ecclesiastical endorsements of members of a religious organization signed only by the official designated by the organization. It is also used to inform job applicants who do not know who their organization has designated as their ecclesiastical endorsing official.

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.

Improved information technology will not decrease the burden on the public.

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.

VA was previously collecting this information under OMB control number 2900-0610, which expired on September 2, 2008. This control number was removed from OMB's inventory because the average number of organizations that submitted the information changed from 10 to 7. VA is requesting the renewal of this collection because the number of respondents per year has increased. In 2015 VA received 58 requests.

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

Since these are applications for individual benefits, no small businesses or other small entities are impacted by the 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.

VA considers the veterans' spiritual care an integral part of the veterans' overall health care. As such, VA is committed to providing qualified VA chaplains to address the veterans' spiritual needs by engaging chaplains that are ecclesiastically endorsed by a religious organization. Ecclesiastical endorsement certifies that the individual is qualified to perform all the religious sacraments, rites, rituals, ceremonies and ordinances needed by members of

the religious organization of which he or she is a member. Without the collection, religious organizations would not be able to endorse applicants for VA Chaplaincy.

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 such special circumstances.

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 Proposed Rule was published in the Federal Register on January 5, 2017 (82 FR1288 Pages: 1288-1294)

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.

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

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.

The information is maintained in accordance with the National Archives and Records Administration General Records Schedule code 1115.3 for Veteran Health Administration Program Offices Primary Program Records.

The data does not include any personal information. The name and contact information that is collected regarding the ecclesiastical endorsing official is organizational information, i.e. the organization's notification to VA of its designation of authority to perform a specific function.

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 are no questions of a sensitive nature.

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

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

VA Form 10-0379	No. of respondents	x No. of responses	x No. of minutes	÷ by 60 =	Number of Hours
ECCLESIASTICAL ENDORSING ORGANIZATION REQUEST TO DESIGNATE ECCLESIASTICAL ENDORSING OFFICIAL	50	1	45		37.50

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 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.

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VHA estimates the total cost to all respondents to be is $\$14.19 \times .75 = \10.64 per respondent or $\$14.19$ per hour X 37.50 total hours = \$532.13 for all respondents.

According to the May 2015 Bureau of Labor Statistics the National Occupational Employment and Wage Estimates code is:

										Mean Hourly Wage	
31-0000	Healthcare Support Occupations	major	3,989,910	0.4%	28.934	\$13.00	\$14.19	\$29,520	0.2%		

Link: https://www.bls.gov/oes/current/oes_nat.htm

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).

Respondents must submit a new form (without any required supporting documents) once every three years. Currently there are 249 respondents on file. The time estimate for submitting the updated form is 30 minutes. The total annual burden on respondents is 83 (one-third of the respondents on file) X 0.5 hours X \$24 per hour = \$996.

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 ANNUAL COST TO THE GOVERNMENT

New Requests				
Reviewer Grade	Reviewer Cost Per Hour (includes salary and benefits costs)	Reviewer Time	# of Requests	Cost
GS-14	\$71.70	1 hour	50	\$3,585
GS-7 (Support staff record-keeping, preparation of responses to requests)	\$34.19	1 hour	50	\$1,709
Resubmission of Request Form Once Every Three Years				
Reviewer Grade	Reviewer Cost Per Hour	Reviewer Time	# of Requests	Cost
GS-7	\$34.19	0.5 hours	83	\$1,418
TOTAL ANNUAL COST TO THE GOVERNMENT				\$6,713

Please note that the time to review new requests varies widely. Some requests are incomplete, in which case review time may be half of the time required to review the average complete request. Complete requests vary in the amount of supporting documents provided. Some complete requests take twice as long as others.

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14 of the OMB form 83-1.

VA does not project any changes since our last submission.

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.

VA does not intend to publish this data.

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 is not seeking to omit the expiration date for OMB approval of the information collection.

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.