

**Date:** October 20, 2016

**To:** Stephanie Tatham, OMB Desk Officer for Veterans Affairs  
Office of Management and Budget (OMB)  
Office of Information and Regulatory Affairs

**From:** Joseph Francis, MD, MPH  
Director, Clinical Analytics and Reporting  
Office of Organizational Excellence (10E)

**Subject:** Request for OMB review and consideration of an emergency clearance for the “Universal Stakeholder Participation Questionnaire (uSPEQ®)” expiring data collection, OMB 2900-0752.

1. VA is submitting a request for “Emergency Clearance” for the PRA package for the Universal Stakeholder Participation Questionnaire (uSPEQ®), a proprietary product developed by the Commission on Accreditation of Rehabilitation Facilities (CARF), and currently in used in VA.

The uSPEQ survey was recommended by the Advisory Committee on Prosthetics and Special Disabilities Programs and concurred by the Secretary of Veterans Affairs in February, 2009. The use of this survey provides a systems approach and benchmarking capability for patient assessed outcomes of care. Use of uSPEQ® with VHA’s rehabilitation populations is in conformance with the requirements of Executive Order 12862, dated September 11, 1993, and entitled "Setting Customer Service Standards," and Executive Order 13571, “Streamlining Service Delivery and Improving Customer Service,” issued on April 27, 2011, which call for agencies to post customer service standards and measure results against those standards.

**a. Data collection is needed prior to the expiration of time periods established in this Part; and**

Due to budget constraints and funding cuts, the last option year of the current contract was modified to “incremental” contracting and the option could only be exercised based on the availability of funding for the following quarter. We were just informed within the past week or so that funding has been secured to solicit a new contract for uSPEQ.

**b. Data collection is essential to the mission of the agency**

The data collection is considered essential to the VA mission. The VA rehabilitation programs involved in the survey must continue, as there are no other coordinated survey mechanisms to obtain the data collected. The survey is used by the Programs to

become CARF accredited. Patient feedback on programs is a required component of accreditation.

2. The agency cannot reasonably comply with the normal clearance procedures under this Part because:

- **The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.**

A lapse in the data collection would interrupt the trending of the data, would delay reporting, and will interrupt any ongoing improvement efforts.

**(i) Public harm is reasonably likely to result if normal clearance procedures are followed;**

The use of this survey is twofold as it is used by the Programs to become CARF accredited. Patient feedback on treatment programs is a required component of the accreditation process.

**(a) The agency shall state the time period within which OMB should approve or disapprove the collection of information.**

VA is requesting to extend the data collection period for an additional 4 to 6 months (November 2016 until February 2017). Following emergency approval, VA will immediately and appropriately submit the 60 and 30-day Federal Register Public Comment period notices in requesting the 3 year clearance under the Paperwork Reduction Act.

Thank you for your consideration of this important matter.

Respectfully,

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10/26/2016

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