

**SUPPORTING STATEMENT
VA NATIONAL VETERANS SPORTS PROGRAMS AND SPECIAL EVENTS**

**Event Surveys for Program Improvement
OMB 2900-0818**

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) administers National Rehabilitation Special Events for Veterans who are receiving care at VA medical facilities. These events are: The National Disabled Veterans Winter Sports Clinic, National Veterans Wheelchair Games, National Veterans Golden Age Games, National Veterans Creative Arts Festival, National Veterans Summer Sports Clinic and National Veterans Training, Exposure and Experience (TEE) Tournament. Each event promotes the healing of body and spirit by motivating eligible Veterans to reach their full potential, improve their independence, achieve a healthier lifestyle and enjoy a higher quality of life.

Veterans attending these events will be asked, but not required, to take a pre and post event survey. The surveys are designed to allow program improvement and measure the tangible, quantifiable benefits of the events using event applications. Information collected on these applications is used for the planning, distribution and utilization of resources and to allocate clinical and administrative support to patient treatment services. Legal authority to collect such information is under 38 USC, Part 1, Chapter 5, Section 527, Evaluation and Data Collection.

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.

Access to information collected for the purposes of administering VA National Rehabilitation Special Events is limited to VA employees whose official duties require such access for the purposes of program planning, implementation and evaluation. Access may occur through physical review of paper surveys as well as accessing the survey website "Survey Monkey" through a password-protected VA account and utilizing VA computer systems containing security software and user authentication requiring unique codes and passwords. VA staff accessing such information have received information security training and have been instructed on their responsibility to maintain confidentiality of the information.

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.

Surveys will be disseminated through an online link which will direct the user to the website "Survey Monkey"
https://www.surveymonkey.com/myaccount_login.aspx. Paper surveys will also be available upon request, although it's anticipated that the vast majority of respondents will use the online option. The online option allows for quicker, easier, cheaper and broader dissemination. Also, Survey Monkey automatically tabulates responses, eliminating the need for VA employee hours spent collecting and tabulating survey responses.

The data collected will allow the program office to ensure that the target audience is being reached, effective therapeutic treatments are being offered, and tangible, quantitative results are being measured and tracked for continual improvement.

The surveys include:

1. National Disabled Veterans Winter Sports Clinic (NDVWSC), VA Form 10107
This form solicits and accepts responses from National Disabled Veterans Winter Sports Clinic participants regarding program efficacy, improvements and suggestions. Participants will develop sports skills and take part in a variety of adaptive sports workshops.
2. National Veterans Creative Arts Festival (NVCAF), VA Form 10108
This form solicits and accepts responses from National Veterans Creative Arts Festival participants regarding program efficacy, improvements and suggestions. The Department of Veterans Affairs (VA) medical facilities use the creative arts as one form of rehabilitative treatment to help Veterans recover from and cope with physical and emotional disabilities.
3. National Veterans Golden Age Games (NVGAG), VA Form 10109
This form solicits and accepts responses from National Veterans Golden Age Games participants regarding program efficacy, improvements and suggestions. NVGAG is the premier senior adaptive rehabilitation program in the United States, and the only national multi-event sports and recreational seniors' competition program designed to improve the quality of life for all older Veterans, including those with a wide range of abilities and disabilities.
4. National Veterans Summer Sports Clinic (NVSSC), VA Form 10110
This form solicits and accepts responses from National Veterans Summer Sports Clinic participants regarding program efficacy, improvements and suggestions. This event hosts Veterans from all over the country who have a variety of injuries, ranging from traumatic brain injury and polytrauma, to spinal cord injury or loss of limb. Its fundamental purpose is to provide early intervention for Veterans battling back from injury, not only strengthening their bodies but overcoming and improving their overall being and self-worth.
5. National Veterans TEE Tournament (NVTEE), VA Form 10111
This form solicits and accepts responses from National Veterans TEE Tournament participants regarding program efficacy, improvements and suggestions. This national event

provides legally blind and eligible disabled Veterans an opportunity to develop new skills and strengthen their self-esteem through adaptive golf and bowling events.

6. National Veterans Wheelchair Games (NVWG), VA Form 10112

This form solicits and accepts responses from National Veterans Wheelchair Games participants regarding program efficacy, improvements and suggestions. NVWG is a sports and rehabilitation program for military service veterans who use wheelchairs for sports competition due to spinal cord injuries, amputations or certain neurological problems.

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 Office of Public and Intergovernmental Affairs (OPIA) has examined whether these surveys represent a duplicate collection of information. There are currently no programs collecting data regarding the efficacy and utilization of the 6 national events. These surveys and the data sought from them are unique.

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

Since these are surveys for individuals, 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.

The collection is conducted to determine the ability of the National Events to provide Veterans with adaptive sports programs that actually impact their health and well being. Without this data, all efforts to justify the events as health care events are qualitative and subjective. VA must be able to provide quantitative data that supports these events. Further, the data collected will allow each event director to make improvements to programs to further the health benefits to the Veterans they serve.

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 notice of Proposed Information Collection Activity was published in the Federal Register on Friday, May 19, 2017, Vol. 82, No. 96, Page 32135. VA 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.

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.

No personally identifiable information is collected at any point in the survey process. All surveys are completely anonymous.

Assurances of privacy are contained in 38 U.S.C. 5701 and 7332. Respondents are informed that the information collected will become part of the Consolidated Health Record that complies with the Privacy Act of 1974. These forms are part of the system of records identified as 121VA19 "National Patient Database – VA" and 57VA135 "Voluntary Service Records – VA" 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.

Information collected for these events is submitted by the respondent. The collection contains no information that would not otherwise be made available to the respondent.

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

Respondents are VA patients who are participating in rehabilitative medical programs. Therefore, respondents may have medical diagnoses which inhibit their physical or mental capabilities. Such diagnoses may include: traumatic brain injury, amputation, spinal cord injury, multiple sclerosis, visual impairment, post traumatic stress disorder, schizophrenia and other cognitive disorders. Such diagnoses may significantly impact respondent burden. The following respondent burden estimates are based on a respondent with few physical or mental limitations. *NOTE: Veterans will only be asked to complete the surveys for the events they participate in. The survey is conducted twice (before and after the event).*

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

National Disabled Veterans Winter Sports Clinic Event Application: checklist, registration (SF), medical clearance, ski information.

VA Form	No. of respondents	x No. of responses	x No. of minutes	/60 =	Number of Hours	
NDVWSC 10107	350	2	2.5			29
NVCAF 10108	150	2	2.25			11.25
NVGAG 10109	750	2	2.5			62.5
NVSSC 10110	250	2	2.25			18.75
NVTEE 10111	175	2	2.75			16
NVWG 101112	600	2	2.75			55
	2275	2	AVG: 2.55			193

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 six therapeutic event applications. See chart in subparagraph 12a above.

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.

In accordance with the Bureau of Labor Statistics May 2016 National Occupational Employment and Wage Estimates, (Code: 00-0000, All Occupations) the mean hourly wage that estimates the annual cost to the respondent is $\$23.86 \times 193$ (burden hours) = \$4,604.98.

Source: https://www.bls.gov/oes/current/oes_nat.htm#00-0000.

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).

Cost estimates are not expected to vary widely. The only cost is to the record keepers for their time, and is minimal because the dissemination point Survey Monkey does the collecting and tabulating of responses.

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.

Costs to the federal government for this data collection include distribution, receipt, tabulation and results delivery of surveys: Survey Monkey completes all of those tasks for an annual fee of \$300.

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

There is no change in burden.

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 approval to omit the expiration date on these forms.

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.