

SUPPORTING STATEMENT A

Program of Comprehensive Assistance for Family Caregivers (PCAFC)

OMB Control Number: 2900-NEW

A. JUSTIFICATION

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

Public Law 111 – 163, Caregivers and Veterans Omnibus Health Services Act of 2010 authorized the Department of Veteran Affairs to implement the Program of Comprehensive Assistance for Family Caregivers (PCAFC). The resultant data from the individual Veteran and caregiver satisfaction surveys will be used to inform VA with an overall gauge of satisfaction with PCAFC participants and will assist in the identification of possible future program improvements. The surveys will solicit voluntary opinions and are not intended to collect information required to obtain or maintain eligibility for a Department of Veterans Affairs (VA) program or benefit.

“Legal authority for this data collection is found under 38 USC, Part I, Chapter 5, Section 527 that authorizes the collection of data that will allow measurement and evaluation of the Department of Veterans Affairs Programs, the goal of which is improved health care for veterans.”

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 Law 111 – 163, Caregivers and Veterans Omnibus Health Services Act of 2010 authorized the VA to implement the Program of Comprehensive Assistance for Family Caregivers (PCAFC). The Veteran’s Health Administration (VHA) seeks approval to administer satisfaction surveys to Veteran and caregiver participants who were enrolled in PCAFC with at least 90 days of program participation between fiscal year 2015 and fiscal year 2016. The resultant data from the Veteran and caregiver satisfaction surveys will be used to inform VHA with an overall gauge of satisfaction of program participants, and will assist in the identification of possible future program improvements.

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.

The VA will administer the Veteran and caregiver surveys using automated web-based techniques designed to decrease the burden on the public and non-respondents to the web survey will have an opportunity to complete a paper survey if desired. The web surveys will implement proven designs that have been utilized in past VA surveys, such as the VA All Employee Survey. Innovative design includes enabling the respondent to remain 'on the mouse' to the fullest extent by limiting data entry via the key board, and presenting survey questions and answers in an intuitive format that supports rapid response. In terms of our strategy, please refer to the charts below as we intend to leverage a multi-mode contact approach to encourage participants to complete the web survey to reduce burden and will be reaching out to participants via email with links to the survey that will lend itself to making this an easy approach for participants.

Caregiver Survey Contact Strategy

Contact	Delivered to	Timeline	Mode
Invitation letter	All Caregivers	Start of the field period	Mail
Invitation email	All Caregivers with email addresses	+3 days after invitation letter mailed	Web
Email reminder	Non-respondent Caregivers with email addresses	+1 week after invitation email	Web
Paper survey	All non-respondent Caregivers	+2 weeks after email reminder	Mail
Interactive Voice Response call	All non-respondent Caregivers	+1 week after paper survey	Phone

Veteran Survey Contact Strategy

Contact	Delivered to	Timeline	Mode
Invitation letter	All Veterans	Start of the field period	Mail
Invitation email	All Veterans with email addresses	+3 days after invitation letter mailed	Web
Postcard reminder	All Veterans	+1 week after invitation email	Mail
Email reminder	Non-respondent Veterans with email addresses	+3 days after postcard reminder	Web
Paper survey	All non-respondent Veterans	+2 weeks after email reminder	Mail
Interactive Voice Response call	All non-respondent Veterans	+1 week after paper survey	Phone

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 information to be gathered from the Veteran and caregiver participants in the Program of Comprehensive Assistance for Family Caregivers through this satisfaction survey effort as a whole is unique and needed information is not available from any other sources.

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

Since the audiences for the surveys are individual Veteran and caregivers PCAFC participants, 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 Veteran population is becoming increasingly diverse with wide ranging needs, Public Law 111 – 163, Caregivers and Veterans Omnibus Health Services Act of 2010 authorized VA to implement the Program of Comprehensive Assistance for Family Caregivers which provides a wide range of services and supports to those who qualify. This is a relatively new program that provides new VA benefits and services directly to qualified post 9/11 Veterans and their designated caregivers. Participant feedback is important for the VA to capture for input into potential program improvements and inform policy and budgetary decision making.

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 that require the collection of information to be conducted in a manner that is inconsistent with the guidelines in 5 CFR 1320.6

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 June 18, 2018 (Volume 83, Number 28350, Page 28350). We received one comment 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.

Various individuals have been consulted over time in the planning and development of the Veteran and caregiver satisfaction surveys for the Program of Comprehensive Assistance for Family Caregivers regarding the availability of data, frequency of collection, clarity of instructions, internal VA record keeping, disclosure, or reporting format, and on the data elements. This includes individuals both inside and outside of the agency.

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

No payment or gift is to be 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

An assurance is made in writing that answers provided are strictly confidential and that VA will protect the Veteran and caregiver participant identity to the extent allowed under the law. Furthermore, respondents are assured that their answers will in no way affect their VA benefits and that no information provided will be released to the general public in a way that can be traced back to the individual respondent.

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 such as those related to sexual behavior and attitudes, religious beliefs or other matters that are commonly considered private or of a sensitive nature asked in the Veteran or caregiver satisfaction survey for the Program of Comprehensive Assistance for Family Caregivers.

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-XXXXX	No. of respondents targeted	x Estimated No. of responses	x No. of minutes	÷ by 60 =	Number of Hours
Veteran Application/Survey	27,000	1 = 8,100	15 = 121,500		2,025

The number of Veteran respondents is 8,100 (estimated at conservatively high response rate of 30% from a universe of 27,000)

Frequency of response is one time per Veteran

Estimated completion time for the Veteran survey is 15 minutes

Total Veteran respondent burden is estimated at **2,025 hours**

VA Form 10-XXXXX	No. of respondents targeted	x Estimated No. of responses	x No. of minutes	÷ by 60 =	Number of Hours
Caregiver Application/Survey	28,000	1 = 8,400	15 = 126,000		2,100

The number of caregiver respondents is 8,400 (estimated at conservatively high response rate of 30% from a universe of 28,000)

Frequency of response is one time per caregiver

Estimated completion time for the caregiver survey is 15 minutes

Total caregiver respondent burden is estimated at **2,100 hours**

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.

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.

VHA uses general wage data to estimate the respondents' costs associated with completing the information collection. In accordance with the Bureau of Labor Statistics (BLS) May 2018 Occupational Wage Code Median Hourly, the mean hourly wage is \$24.98 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: https://www.bls.gov/oes/2018/may/oes_nat.htm.

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. VHA estimates the total annualized cost to respondents to be \$103,042.50 (4,125 burden hours x \$24.98 per hour).

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 recordkeeping burden beyond that which is considered usual and customary.

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 estimated cost to the Federal Government is \$661,541 -- which is representative of the small business contractor cost which includes survey development, print and web administration, mailing activities, data processing, analysis, project management and development of a final report.

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

This is a new one-time collection, and all burden hours are considered a program increase.

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.

The primary purpose of this data collection is not for publication. The aggregated information will be disseminated nationally primarily in VA reports, but the aggregate results may be published. Data will also be used for VA internal policy and program development and related analyses.

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 will include the expiration date on the surveys.

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.