

# Creating Options for Veterans Expedited Recovery (COVER) Commission Veterans Focus Groups: Mental Health Services Preferences and Utilization Data Collection

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.

The COVER Commission, established as required by the Comprehensive Addiction and Recovery Act of 2016 (CARA), Section 931 (Public Law 114-198), is charged to meet the duties outlined within the legislation. The legislation, Section 931(b)(2), specifically states that the COVER Commission is to conduct a patient-centered survey within each of the Veterans Integrated Service Networks. (See Support Document – Public Law 114-198, Section 931(b)(2))

### 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 COVER Commission was established under the Comprehensive Addiction and Recovery Act of 2016 (CARA). The Commission's purpose is to examine the evidence-based therapy treatment model used by the Secretary of Veterans Affairs for treating mental health conditions of Veterans and the potential benefits of incorporating complementary and integrative health treatments available in non-Department facilities. There are 5 identified duties that the Commission is tasked to evaluate and provide recommendations to the President of the United States, House and Senate Veterans Affairs Committees, and the Secretary of VA eighteen months after the establish of the Commission, which will be December 2019. **The Commission is requesting approval from the Office of Management and Budget (OMB) for a focus group protocol to meet the charges outlined under Duty 2 in the legislation** (bolded in table below). The instrument will collect qualitative information from Veterans seeking and utilizing mental health services through VA and non-VA facilities **that is not available anywhere else.**

### 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.

This collection of information will use technology only for the virtual Focus Groups. The survey will be conducted during in-person or virtual Focus Group sessions held in each VISN, with 8-10 participants in each session selected from Veterans who volunteer to participate. The main purpose of the Focus Group discussions is to hear from Veterans about the kinds of outpatient, inpatient, residential, complementary and integrative health (CIH) treatments of mental health concerns (e.g., PTSD, depression, substance use disorder including opioid use, or any other mental health issues) they are receiving or have received in the past at VA or non-VA facilities. The participants will also be asked to discuss their experiences and preferences regarding mental health treatment options, challenges related to seeking mental healthcare, and any suggestions for improvement of services. Participants will be asked to manually fill out a demographics survey and hand it back to the Focus Group leader. Each Focus Group session will last approximately 2 hours.

### 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.

Search of existing survey data sources failed to identify data collected across each VISN from Veterans representing all eras of military service that address the mental health services and experiences of Veterans seeking care for mental health conditions both in the VA and in the private sector.

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

As this survey is focused on the experiences of Veterans seeking care for mental health conditions, 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 would not be responsive to the legislative requirement to survey Veterans in every VISN regarding their experiences seeking care for mental health conditions.

**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 60-day notice for the Proposed Information Collection Activity was published in the Federal Register on March 6, 2019 (84 FR 8153). We received no comments in response to this notice.

The 30-day notice was published on May 8, 2019 (84 FR 20205). To date, we have not received 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.**

*If filed in the medical record:* Not applicable

*If filed in research records:* Not applicable

If filed in CHAMPA VA records: Not applicable

Data collected will be aggregated. Veterans are informed verbally and in writing that no information will be attributable to the individuals participating in the Focus Groups.

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-XXXXX	No. of respondents	x No. of responses	x No. of minutes	÷ by 60 =	Number of Hours
Application/Survey	200	1 = 200	120 = 24000		400

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 (one 2-hour focus group session per participant).

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](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 individual hour burden cost to respondents to be \$49.96  
(2 burden hours x \$24.98 per hour)

The total hour burden cost to all respondents to be \$9,992.00  
(400 burden hours x \$24.98 per hour)

Note that there are no actual costs paid for respondents – participation is voluntary.

**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 total cost to the Federal Government is \$113,600

Data Source: <http://www.fedsdatacenter.com/gs-pay-calculator/>

- a. Contractor Costs: \$6600 x 16 focus group sessions = \$105,600

Contractor Tasks	Estimated Hours Per Focus Group	Estimated Cost Per Focus Group
Tailoring of protocol for each site (flyer, background information for veterans, Recruiters, etc.)	4	Normal labor cost
Participant recruitment activities (including screening of the potential participants)	6-14	\$1600
Conducting focus group discussions (moderator and note taker hours)	5	\$600
Transcription of recordings/notes clean up – Sigma	6-8	\$500
Summary report development	16-20	\$2,400
Travel costs for moderator (note taker costs covered in overall site visit costs) *Includes hotel, flights, MIE, ground transportation. Price dependent on location/travel distance	N/A	\$1,500*
<b>Total Contract Costs Per Focus Group</b>		<b>\$6,600</b>

- b. VA Support Team oversight: 80 hrs x \$100 (GS15-5 hourly salary) = \$8,000

**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 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.**

Focus Groups will be scheduled at various locations to ensure that Veterans are surveyed with each VISN. This data collection process will begin within 3-4 weeks from the date OMB approval to proceed is obtained and will continue for approximately 5-6 months until Veterans in each VISN are surveyed.

Results will then be aggregated and summarized within 3-4 weeks after the final Focus Group has been completed. The summary report of findings will be provided to the COVER Commissioners, who will review and discuss the findings and determine if any specific recommendations will be made in the final report as a result of the survey results. The results of the Focus Group survey will not be a standalone publication; however, the findings will be summarized as one component of the COVER Commission's final report that will be submitted to the POTUS, SECVA, and Veterans Affairs Committees with the House and Senate in December 2019. This report will be uploaded to the Federal Registry at the termination of the commission in December 2019 or January 2020.

**17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

No preference.

**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.