Supporting Statement A

Staff Sergeant Parker Gordon Fox Suicide Prevention Grant Program [SSG Fox SPGP -- AR16]

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.

On October 17, 2020, the Commander John Scott Hannon Veterans Mental Health Care Improvement Act of 2019, Public Law (P. L.) 116-171 (the Act), codified as a note to section 1720F of title 38, United States Code (U.S.C.), was enacted in law. Section 201 of the Act mandated VA establish the Staff Sergeant Parker Gordon Fox Suicide Prevention Grant Program (SSG Fox SPGP) to reduce Veteran suicide through the provision of community-based grants to certain eligible entities to provide or coordinate the provision of suicide prevention services to eligible individuals and their families.

In order to award grants under this program, and assess services and compliance with grants provided, VA will require submission of Applications for grants and Renewals of grants, Eligibility Screening Tools, Suicide Risk Screening Tools, Participant Satisfaction Surveys, Intake Form and Program Exit Checklist (which each utilize the same five standardized assessment tools required for baseline mental health screening, as listed below) and Compliance Reports.

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.

<u>Eligibility Screening Tool</u>: This data collection instrument will be collected by grantee staff to determine eligibility for the grant program, prior to enrollment. The instrument will include suicide risk factors

<u>Suicide Risk Screening:</u> Columbia Suicide Severity Rating Scale (C-SSRS) will be administered by grantees to assess suicide risk.

<u>Application:</u> This information is needed to award SSG Fox SPGP grants to eligible entities. The application requirements are consistent with section 201(f) of the Act and are designed to ensure that VA can fully evaluate the ability of applicants to achieve the goals of the grant program.

To apply for a suicide prevention services grant, an applicant must submit to VA a complete suicide prevention services grant application package, as described in the Notice of Funding Opportunity (NOFO). VA will publish a NOFO in the Federal Register and Grants.gov identifying such items as the location for obtaining suicide prevention services grant application packages; the date, time, and place for submitting completed suicide prevention services grant applications; the estimated amount and type of funding available, such as the amount of funds

available for initial and renewal suicide prevention services grants; the length of term for supportive services grant payments; and other information necessary for the suicide prevention services grant application process as determined. Per the direction of P.L. 116-171, complete suicide prevention services grant application package will include the following:

- (1) Documentation evidencing the experience of the applicant and any identified community partners in providing or coordinating the provision of suicide prevention services to eligible individuals and their families.
- (2) A description of the suicide prevention services proposed to be provided by the eligible entity and the identified need for those services.
- (3) A detailed plan describing how the eligible entity proposes to coordinate or deliver suicide prevention services to eligible individuals.
- (4) A description of the population of eligible individuals and their families proposed to be provided suicide prevention services.
- (5) An estimate of the number of eligible individuals at risk of suicide and their families proposed to be provided suicide prevention services, including the percentage of those eligible individuals who are not currently receiving care furnished by VA.
- (6) Evidence of measurable outcomes related to reductions in suicide risk and mood-related symptoms utilizing validated instruments by the eligible entity (and the proposed partners of the entity, if any) in providing suicide prevention services to individuals at risk of suicide, particularly to eligible individuals and their families.
- (7) A description of the managerial and technological capacity of the eligible entity.
- (8) Clearly defined objectives for the provision of suicide prevention services.
- (9) A description and physical address of the primary location of the eligible entity.
- (10) A description of the geographic area the eligible entity plans to serve during the grant award period for which the application applies.
- (11) If the eligible entity is a State or local government or an Indian tribe, the amount of grant funds proposed to be made available to community partners, if any, through agreements.
- (12) A description of how the eligible entity will assess the effectiveness of the provision of grants under this section.
- (13) An agreement to use the measures and metrics provided by VA for the purposes of measuring the effectiveness of the programming to be provided in improving mental health status, wellbeing, and reducing suicide risk and suicide deaths of eligible individuals and their families.
- (14) An agreement to comply with and implement the requirements of this part throughout the term of the suicide prevention services grant.
- (15) Any additional information as deemed appropriate by VA.

Renewal Application: This data collection instrument has been developed for grantees to renew grants previously awarded. The renewal application will allow VA to fully evaluate the ability of applicants to achieve the goals of the SSG Fox SPGP and proposed 38 CFR Part 78. This information will be used by VA to determine whether to award renewal funds to existing grantees.

<u>Participant Satisfaction Survey:</u> This data collection instrument has been developed to capture consumer feedback about services and to evaluate the SSG Fox SPGP. This information will be used by VA to determine the satisfaction of Veterans participating in the grant programfunded services and the effectiveness of those services provided under the SSG Fox SPGP.

Intake Form: This data collection instrument will be used by grantee staff to collect demographic and military service. This information will be used by the VA to identify trends of the Veteran population the grantees are servicing. In addition, the intake form will include the following assessments (described below): (1) Social Economic Status (SES); Patient Health Questionnaire (PHQ-9); Short Warwick-Edinburgh Mental Wellbeing Scale (SWEMWS); General Self-Efficacy Scale (GSE) and Interpersonal Support Evaluation List (ISEL-12).

<u>Program Exit Checklist</u>: This data collection instrument will be used by grantee staff at the completion of the program to track the following assessments upon program exit (described below): 1) Social Economic Status (SES); Patient Health Questionnaire (PHQ-9); Short Warwick-Edinburgh Mental Wellbeing Scale (SWEMWS); General Self-Efficacy Scale (GSE) and Interpersonal Support Evaluation List (ISEL-12).

These assessments are all brief, simple, publicly available and well-validated. These instruments will be used by the VA to determine whether there was a reduction of mood-related symptoms and overall improved well-being functioning of the participant at both Intake and Program Exit:

<u>Socio-Economic Status (SES)</u>: This instrument will be used by the VA to determine whether there was change financial stress, annual income, level of education and employment status over the enrollment period in program, the assessment will be administered at the beginning of the program enrollment and at exit.

<u>Patient Health Questionnaire (PHQ-9)</u>: This instrument will be used by the VA to determine whether there was change mood related symptoms over the enrollment period in program, the assessment will be administered at the beginning of the program enrollment and at exit.

<u>Short Warwick Edinburgh Mental Wellbeing Scale (SWEMWS)</u>: This instrument will be used by the VA to determine whether there was overall well-being of participant over the enrollment period in program, the assessment will be administered at the beginning of the program enrollment and at exit.

<u>Generalized Self-Efficacy Scale</u>: This instrument will be used by the VA to determine whether there was change in Self Efficacy over the enrollment period in program, the assessment will be administered at the beginning of the program enrollment and at exit.

<u>Interpersonal Support Evaluation List (ISEL-12)</u>: This instrument will be used by the VA to determine whether there was change in social supports over the enrollment period in

program, the assessment will be administered at the beginning of the program enrollment and at exit.

Compliance Reports: This information collection will be required to ensure grantees are complying with all program requirements set forth in proposed 38 CFR Part 78 and their grant agreements. These reports would allow VA to assess the provision of services under this grant program. These reports are Program & Budget Changes, Annual Performance Reports, Other Performance and Implementation Reports, Other Financial Reports, and Annual Financial Expenditure Reports, and Corrective Action Plans which are submitted at close-out of annual award.

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 Initial Application and subsequent Renewal Application, and Compliance Reports will require the use of Adobe Acrobat, Microsoft Word, or a comparable word processing program, and Microsoft Excel. The Initial Application and subsequent Renewal Application and Compliance Reports will be made available in an electronic format on VA's website. The electronic format requires the use of the internet to access the forms and the use of Microsoft Excel to submit applicant budget. The Participant Survey will be made available electronically to each participant by the grantee. The basis for adopting this means of collection is necessary for the proper performance of application collection and evaluation functions. It avoids unnecessary duplication and reduces burden on small entities. Electronic submission also reduces costs associated with sending and handling mail. Compliance Reports will be submitted electronically via the program grants management system. A website interface will also be used to complete the Eligibility Screening Tool, Suicide Risk Screening, Intake Form, Exit Program Checklist, and Standardized Assessments. The use of technology reduces the burden of paperwork for the grantees and program participants.

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.

Information contained within these forms is expected to be original and not a duplication of any other information.

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

Every effort has been made to minimize the burden to small entities by keeping questions simple and to a minimum on the initial application. The length of the proposed application has been deemed necessary to ensure that VA awards grants only to the most qualified eligible

entities and follows P.L. 161-171. This is also applicable to the Renewal Application. The use of

electronic collection techniques will reduce the burden because it will avoid duplicating materials. Electronic submission also reduces costs associated with sending and handling mail.

The Participant Satisfaction Survey will be used to survey individuals, so no small businesses or other small entities are impacted by the information collection. Every effort is being made with the Compliance Reports to minimize the burden to small businesses by keeping questions simple and to a minimum. The length of the proposed reports has been deemed necessary to ensure that grantees are conforming to program requirements. Program & Budget Changes and Corrective Action Plans will be submitted by grantees when necessary. Not all will be required to submit these; however, in instances in which modification of grant is necessary because of proposed significant changes to the grant program, or if actual suicide prevention services grant expenditures vary from the amount disbursed or activities vary from the grantee's program description, these changes would be required.

The use of electronic collection techniques will reduce burden because it will be consistent and compatible with current reporting and recordkeeping practices. It makes appropriate use of information technology. The eligibility screening tools will be used to assess all referrals to the program. The tool will be administered in an electronic format, reducing the burden paper documents, and expediting eligibility determination. The Intake Form, Program Exit Checklist, and standardized assessments will be administered in an electronic format, using Behavioral Touch Link.

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.

Collection of the initial Applications and/or the Renewal Application must be conducted as part of the annual NOFO in order to distribute available SSG Fox SPGP grant funds or to renew grant agreements, provided funds are available. These application forms may need to be updated in the future to reflect changes made to the Final Rule or NOFO.

VA would not be able to conduct annual program evaluation or formal assessment of the grant program if the Participant Satisfaction Survey, Compliance Reports and other reports for the grant program collection were not conducted or were conducted less frequently.

Program & Budget Changes reports are necessary for VA to approve and ensure that such changes are consistent with proposed 38 CFR part 78 and the goals and intent of the Staff Sergeant Parker Gordon Fox Suicide Prevention Grant Program. Corrective Action Plans will be required should the VA become aware of performance issues that needed to be resolved. These collections are not required of every grantee and in only limited instances.

The Eligibility Screening and Suicide Risk assessment tools are necessary to ensure that the VA resources are directed at the intended population in an efficient, equitable method.

The Intake Form, with assessments. is necessary to collected demographic data, military service, VA income not captured in SES, and other data elements to ensure that correct services are offered to participants.

The Program Exit Checklist, with assessments, is necessary to determine whether there was a reduction of mood-related symptoms, an overall improved well-being functioning of the participant, and mitigation of any financial and social support stressors.

<u>Socio-Economic Status (SES)</u>: This instrument is necessary to ensure the correct services are offered to the participants. The data collected will be used by the VA to determine a baseline of the participant in relation financial stress, annual income, level of education and employment status and an exit assessment to review any progress made. In addition, this will assist with the evaluation of the effectiveness of the services.

<u>Patient Health Questionnaire (PHQ-9)</u>: This instrument is necessary to ensure the correct services are offered to the participants. The data collected will be used by the VA to determine a baseline of the participant in relation to mood related symptoms and an exit assessment to review any progress made. In addition, this will assist with the evaluation of the effectiveness of the services.

<u>Short Warwick Edinburgh Mental Wellbeing Scale (SWEMWS)</u>: This instrument is necessary to ensure the correct services are offered to the participants. The data collected will be used by the VA to determine a baseline of the participant in relation to overall wellbeing and an exit assessment to review any progress made. In addition, this will assist with the evaluation of the effectiveness of the services.

<u>Generalized Self-Efficacy Scale</u>: This instrument is necessary to ensure the correct services are offered to the participants. The data collected will be used by the VA to determine a baseline of the participant in relation to self-efficacy and an exit assessment to review any progress made. In addition, this will assist with the evaluation of the effectiveness of the services provided.

Interpersonal Support Evaluation List (ISEL-12): This instrument is necessary to ensure the correct services are offered to the participants. The data collected will be used by the VA to determine a baseline of the participant in relation to social supports and an exit assessment to review any progress made. In addition, this will assist with the evaluation of the effectiveness of the services

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 contained in the Interim Final Rule published in the Federal Register on March 10, 2022 (Volume 87, Number 47, Page 13806). 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.

Consultation with other VA Grants programs (VHA Homeless Program Office Supportive Services for Veterans and Families (SSVF) and Grant Per (GPD)) was completed during the development phase of the program. As the statutory authority section 201 of P.L. 116-171 required VA to consult with certain organizations regarding the grant program, VA sought feedback from the public through a request for information published in the Federal Register (FR) on April 1, 2021 (86 FR 17268). Additionally, VA held two listening sessions on May 25, 2021 and May 26, 2021 to solicit further feedback relating to that request (86 FR 25938). The topics for these consultations included distribution and selection of grants, administration of the grant program, training and technical assistance, referrals for care, risk of suicide, and suicide prevention services. Additional public comment will be sought through the 60- and 30-day comment periods after publication of interim final rule and identified in the Federal Register notice.

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

No payment or gift will 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.

Information in this data collection will become part of a system of records that complies with the Privacy Act of 1974. This system is identified as "Veteran, Patient, Employee and Volunteer Research and Development Project Records-VA (34VA12)" 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 is data used in the normal course of service provision. Information is provided voluntarily by the participants. The VA will not be presenting information outside what is expected and provided for individuals with presentation of suicide risk

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:

Information	No. of Respondents	x No. of Responses	x No. of Minutes	÷ by 60 =	Burden Hours
Eligibility Screening	90	67	30		3,015
Suicide Risk Screening (CSSRS)	90	67	15		1,508
Initial Application	250	1	2100		8,750
Renewal Application	90	1	600		900
Participant Satisfaction Survey	5000	1	15		1,250
Intake Form & Assessments	90	67	30		3,015
Program Exit Assessments	90	67	30		3,015
Compliance – Program Change Request	90	2	15		45
Compliance - Annual Performance Report	90	1	45		68
Compliance - Other Performance Report	90	2	30		90
Compliance - Quarterly Financial Report	90	2	30		90
Compliance - Annual Financial Report	90	1	45		68
Compliance - Corrective Action Plan	25	1	30		13
Totals		30,205			21,827 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.

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.

The total cost to all respondents for completing these collections of information is \$611,374.27

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. In accordance with the latest available BLS Occupational Wage Code Median Hourly (May 2021), the mean hourly wage is \$28.01 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm

Thus, a total of 21,827 hours X 28.01 equals \$611,374.27 for all information collections.

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).

There are no associated costs with third parties. The survey will be completed by participants and should pose no time or cost expense on grantees. There will be no cost burden to record keepers, as the survey will be collected online and data (not identifiable as survey is anonymous) will be kept by VA.

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.

Information	No. of Submissions	GS Staff	Mins	Rate/hr	Cost
Eligibility Screening	6000	GS-13, Step 4	1	41.71	4,171
Suicide Risk Screening	6000	GS-13, Step 4	1	41.71	4,171
Initial Application	250	GS-13, Step 4	240	41.71	41,710
Renewal Application	90	GS-13, Step 4	180	41.71	11,261
Participant Satisfaction Survey	5000	GS-13, Step 4	1	41.71	3,475
Intake Form & Assessments	5000	GS-13, Step 4	1	41.71	3,475
Program Exit Checklist &	5000	GS-13, Step 4	1	41.71	3,475
Assessments					
Compliance - Program &	180	GS-13, Step 4	60	41.71	7,507
Budget Changes					
Compliance - Annual	90	GS-13, Step 4	60	41.71	3,754
Performance Report					
Compliance - Other	180	GS-13, Step 4	60	41.71	7,507
Performance Report					

Compliance - Other Financial	180	GS-13, Step 4	60	41.71	7,507
Report		-			
Compliance - Annual Financial	90	GS-13, Step 4	60	41.71	3,753.
Expenditure Report					
Compliance - Corrective Action	25	GS-13, Step 4	30	41.71	521.37
Plan					
Totals	28,175	NA	755	NA	98,812.37

The total annual cost estimate for Federal Government is \$98,812.37

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.

These are new collections, 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.

Eligibility Screening Tools: VA will publish aggregate data in its annual reports.

Suicide Risk Screening: VA will publish aggregate data in its annual reports.

<u>Application</u>: VA does not intend to publish this data, except to notify the selected applicants of their grant award and announce to the public the list of grant awards. This form will be published along with the NOFO. Once the NOFO has been published, applicants will have 30 to 45 days to submit a completed application package. Once the application period is over, the information will be reviewed during an approximately 6-month VA evaluation period, after which SSG Fox SPGP grants will be awarded.

The following data collections will be subsequently submitted for OMB approval, following the initial SSG Fox SPGP implementation. Upon completion, each collection will be assigned a VA Form number and submitted for PRA approval under the anticipated OMB clearance number for the SSG Fox SPGP:

Renewal Application: VA does not intend to publish this data, except to notify the selected applicants of their grant renewal and announce to the public the list of grant awards. This form will be published along with a NOFO. Once the NOFO has been published, applicants will have approximately 30 to 45 days to submit a completed renewal application package. Once the application period is over, the information will be reviewed during an approximately 6-month VA evaluation period, after which SSG Fox SPGP grants will be renewed.

<u>Participant Satisfaction Survey:</u> VA will publish this data in its annual reports. Grantees will be required to provide surveys to participants within 30 days of such participant's pending exit from the grantee's program. These collections will be ongoing throughout the duration of the program.

<u>Compliance Reports:</u> VA does not intend to publish this data. Collections will occur on an annual and ad hoc basis upon execution of the grant agreements, in addition to Program Changes, Corrective Action Plans and Financial Expenditure Reports, as needed.

<u>Intake Form and Program Exit Checklist</u>: VA will publish this de-identified data in aggregate form within annual reports. These collections will be ongoing throughout the duration of the program.

<u>Socio-Economic Status (SES)</u>: VA will publish this de-identified data in aggregate form within annual reports. These collections will be ongoing throughout the duration of the program.

<u>Patient Health Questionnaire (PHQ-9)</u>: VA will publish this de-identified data in aggregate form within annual reports. These collections will be ongoing throughout the duration of the program.

<u>Short Warwick Edinburgh Mental Wellbeing Scale (SWEMWS)</u>: VA will publish this deidentified data in aggregate form within annual reports. These collections will be ongoing throughout the duration of the program.

<u>Generalized Self-Efficacy Scale</u>: VA will publish this de-identified data in aggregate form within annual reports. These collections will be ongoing throughout the duration of the program.

<u>Interpersonal Support Evaluation List (ISEL-12)</u>: VA will publish this de-identified data in aggregate form within annual reports. These collections will be ongoing throughout the duration of the program.

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 all 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.