

## Supporting Statement - A for Paperwork Reduction Act (PRA)

### GI BILL COMPARISON TOOL RATINGS SURVEY

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.**

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers' needs, the Department of Veterans Affairs (hereafter "VA") seeks to obtain OMB approval of this Survey to collect qualitative feedback on our service delivery for Veterans Benefits Administration (VBA). By qualitative feedback, we mean information that provides useful insights on perceptions and opinions, but not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Administration of the Department of Veterans Affairs to garner customer and stakeholder feedback in an efficient and timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs, particularly, the GI Bill Comparison Tool Ratings. This feedback will provide insights into customer or stakeholder perceptions, experiences, and expectations; provide an early warning of issues with service; or focus attention on areas where communication, training, or changes in operations might improve delivery of services. This collection of information will allow for ongoing, collaborative, and actionable communications between the Agency and its customers and stakeholders. They will also allow feedback to contribute directly to the improvement of program management.

The Veterans Administration (VA) Education Service Office is asking Veterans and other eligible beneficiaries to complete this survey to provide compliments, recommendations, or concerns regarding their experience accessing and utilizing GI benefits at their academic institution, as well as their overall experience at their academic institution. The collection of this information will allow VA to better understand the Veterans' and beneficiaries' overall experience related to the VA benefits and services academic institutions provide them.

This survey will focus on Post-9/11 GI Bill Veterans receiving benefits under chapter 33 and chapter 35 for dependent spouses, surviving spouses, or children of a Veteran.

The VA will measure how recent graduates feel about the institution they attended, and the education they received. This includes quality of classes, in person versus online learning, GI Bill support, or the supportiveness of School Certifying Officials (SCOs), degree of support for the Veteran community at the institution, and the student's overall experience, in order to help improve the education benefits and services VA provides.

The goal of service level measurements is two-fold:

- 1) To collect educational experience data to monitor the relative success of academic programs and institutions with regard to customer experience.
- 2) To help field office staff, and the national office to identify the needs of the specific population they serve, as well as identify areas for improvement for academic institutions.

**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 VA will send this brief survey to Veterans and eligible beneficiaries who recently graduated from college. The sampled customers will be contacted through an invitation email. A link will be enclosed so the survey may be completed using an online interface, with customized customer information. The survey itself consists of a handful of questions revolving around a human-centered design, focusing on such elements as trust, emotion, effective, and ease with the services and educational care they received.

The information provided will be used by VA to measure how recent graduates who used the GI Bill feel about the institution they attended, and the education they received. This includes quality of classes, in person versus online learning, GI Bill support (or supportiveness of school certifying officials), degree of support for the Veteran community at the institution, and overall experience.

**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 ICR survey collection will be sent via email.

**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.**

No similar data is gathered or maintained by VA or is available from other sources known to VA.

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

The information collection involves Veterans and their eligible beneficiaries. The information may be collected directly from individuals via, email. The information may also be submitted voluntarily. There is no impact on academic institutions, or small businesses or entities for 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.**

Without this type of feedback from the Survey, VA will not have timely information to adjust its services to meet customer needs.

**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 special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

**8a. 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.**

In accordance with 5 CFR 1320.8(d), a 60-day notice of Proposed Information Collection activity was published in the Federal Register on June 13, 2022, Volume 87 Number 113, Page 35851.

**8b. 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.**

VA worked with federal contractors who consulted with prospective respondents to gather information regarding the various data elements such as delivery, frequency, clarity of instructions, survey question content, etc. This is a new collection, so there are no known circumstances which may preclude recurring consultation every three years.

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

No payments or gifts to respondents will be made under this collection of information. Generally, VA will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

**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.**

Our assurance of privacy is covered by 38 U.S.C 5701, and our System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), which are contained in the Privacy Act Issuances, 2012 Compilation.

If a confidentiality pledge is deemed useful and feasible, VA will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If VA includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

**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:**

**The number of respondents, frequency of responses, annual hour burden, and explanation for each is reported as follows:**

The survey instrument will be used to collect information from respondents. The total estimated number of respondents is 1,416, which consists of, and accounts for, the survey being conducted twice annually, July and February.

The Annual Burden Hours requested is 118 hours total, as shown in the chart below:

**a. Burden Hours:**  $(204 \times 5\text{min} / 60) = 17$  hours, and  $(1212 \times 5\text{min} / 60) = 101$  hours

**Burden Time:** 5 minutes

**Frequency:** Twice Annually

<b>ESTIMATED ANNUAL REPORTING BURDEN HOURS</b>				
<b>Category of Respondent</b>	<b>No. of Respondents per month</b>	<b>No. of Respondents Per year</b>	<b>Participation Time</b>	<b>Total Burden Hours</b>
GI Bill Comparison Tool Ratings (CH33)	101	1,212	5 minutes	101 hours
GI Bill Comparison Tool Ratings (CH35)	17	204	5 minutes	17 hours
<b>Totals</b>	<b>118</b>	<b>1,416</b>	<b>5 minutes</b>	<b>118 hours</b>

**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.**

VA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, VA uses general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$1,120.40. Assuming a forty (40) hour work week, 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](https://www.bls.gov/oes/current/oes_nat.htm) (May 2021).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$3,305.18 (118 burden hours x \$28.01 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 annual cost to the Federal Government to conduct this data collection is \$13,924.00 [1,416 responses X 118 burden hours X 5 minutes / 60].

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

There is no change in burden. This GI Bill Comparison Tool Ratings Survey is a new information collection submission.

**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.**

Feedback collected under this regular 3-year ICR submission provides useful information, but does not yield data that can be generalized to the overall population. Findings will be used for general service improvement, but are not for publication, tabulation, or other public release.

Although the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., Congressional inquiry, Freedom of Information Act requests). VA will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public", and will include specific discussion of the limitation of the qualitative results.

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

We are not seeking approval to omit the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.**

These activities comply with the requirements in 5 CFR 1320.9 – and there are no exceptions.