

SUPPORTING STATEMENT A

Readjustment Counseling Service Scholarship Program (RCSSP)
[AR31]

VA Forms 10-264, 10-264A, 10-264D-K, 10-264M

OMB Control Number: 2900-0899

A. JUSTIFICATION

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

This information collection is necessary due to the mandates of section 502 of Public Law 115-171, the Commander John Scott Hannon Veterans Mental Health Care Improvement Act of 2019, which amended Chapter 76 of title 38 United States Code (U.S.C.) by establishing new sections 7698 through 7699B and creating a new scholarship program known as the Readjustment Counseling Service Scholarship Program (RCSSP). This legislation authorizes the Department of Veterans Affairs (VA) Readjustment Counseling Service (RCS) to provide scholarship awards to individual Veterans enrolled in accredited academic programs leading to an appointment in one of the selected health professional occupations (psychology, social work, marriage and family therapy, or mental health counseling). The RCSSP would serve as an incentive to eligible individuals to further their own career development through completing a graduate degree in one of these four professions. Implementation of the RCSSP would also provide increased access to care for eligible individuals by filling existing vacancies in Vet Centers located in sparsely populated areas distant from other Vet Centers. It is expected that many of these scholarship recipients will continue with VA employment after completion of their service obligation. 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.

The information required determines the eligibility or suitability of an applicant desiring to receive an award under the provisions section 502 of Public Law 115-171, the Commander John Scott Hannon Veterans Mental Health Care Improvement Act of 2019. The information is needed to apply for the new scholarship program known as the Readjustment Counseling Service Scholarship Program (RCSSP). The RCSSP would provide educational assistance to individuals who pursue a graduate degree in psychology, social work, marriage and family therapy, or mental health counseling that would meet the education requirements for appointment as a health care professional in one of those fields in VA Vet Centers.

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.

VA will allow applicants to submit and update application packages online and via facsimile. This method allows VA to receive, validate submission, and electronically transmit applications to technical reviewers before forwarding to selecting officials for approval. VA is diligently working on a fully automated electronic cloud-based application management system to expedite processing and reduce burden.

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 RCSSP authorized by Public Law 115-171 is a new authority with no previous history of duplicative collections. In addition, each student respondent would be a new case whose collective information would have to be reviewed for suitability for award of scholarship.

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

Because these are applications for individual benefits, 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 appropriate expenditure of federal funds used covering the scholarship casts, nor to the counseling needs of Vet Center clients to be served by the successful graduates of the RCSSP.

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 as part of the proposed rule in the Federal Register on November 5, 2021 (Volume 86, Number 212, Pages 61094-61100).

The notice of Proposed Information Collection Activity was published in the final rule in the Federal Register on November 22, 2022 (Volume 87, Number 224, Pages 71254-71258).

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 included within the proposed and final rules.

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.

Information on these forms will become part of a system of records that complies with the Privacy Act of 1974 and VA confidentiality statutes 38 USC § 5701 and 38 USC § 7332. Respondents are informed that the information collected will be included as a part of the system of records identified as 54VA16, Health Administration Center Civilian Health and Medical Program Records-VA, as set forth in the Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html> and disclosures made in accordance with the statute.

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:

Total annual Burden Hours = 158 hours.
Total annual Responses = 55.

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

Application

VA Form	No. of Respondents	No. of Responses	Equals	x No. of Minutes	Divided by 60 =	Number of Burden Hours
Application 10-264G	50	1	50	60 = 3000		50
Academic Verification 10-264	50	1	50	60 = 3000		50
Evaluation and Recommendation 10-264E	50	1	50	50 = 2500		41.67
Addendum to Application 10-264A	50	1	50	10 = 500		8.33
Total Application Burden Hours*						150 hours

*Approximately 50 applicants annually will complete all four forms to apply to the program.

Scholarship Award to Selected Participants (from 50 Applicants)

VA Forms	No. of Respondents	No. of Responses	Equals	x No. of Minutes	Divided by 60 =	Number of Burden Hours
Scholarship Agreement 10-264F	5	1	5	15 = 75		1.25
Mobility Agreement 10-264M	5	1	5	10 = 50		0.83
Scholarship Offer Response 10-264K	5	1	5	10 = 50		0.83
Notice of Change/Annual Academic Status 10-264I	5	1	5	20 = 100		1.67
Notice of Approaching Graduation 10-264H	5	1	5	10 = 50		0.83
Education Notice Completion 10-264D	5	1	5	20 = 100		1.67
Request for Deferment 10-264J	5	1	5	10 = 50		0.83
Total Award Burden Hours				95 min = 1.6 hours		7.91 = ~8.0 hrs
Total Application + Award Burden Hours						150 + 8 = 158 hrs

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 respondent population for the identified VA Forms is composed of student applicants who are requesting scholarships in psychology, social work, mental health counseling and/or marriage and family counseling. Note: 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, VHA used general wage data from the Bureau of Labor Statistics (BLS) 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 hourly wage is \$27.07 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.

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 \$4,277.06 (158 burden hours x \$27.07 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.

Note: The Regulatory Impact Analysis for this scholarship program purposely excluded any FTE for the addition of new staff to address operating costs. Therefore, existing VA staff members will be responsible for processing the applications and administering the RCSSP.

The estimated annual cost to the Federal Government of VA Forms series 10-264 -- 10-264M is \$960.00.

Processing 50 Applicants x \$32.02/hour (GS-12) x 1500 min. = \$800.00.

- Processing 5 Awards x \$32.02/hour (GS-12) x 300 min. = \$160.00 = TOTAL \$960.00

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

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.

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 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.