

SUPPORTING STATEMENT A

State Veterans Homes Construction & Acquisition Grant Program (SVHCGP)

VA Forms 10-0388-1 through -13 (series)

OMB Control Number 2900-0661

Summary of Changes from Previously Approved Collection:

- There are no changes in the estimated number of responses or burden hours
- No comments were received on the 60-day FRN

A. JUSTIFICATION

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

38 U.S. Code Sections 8133(a) and 8135(a) authorize and appropriate expenditure of funds for State Home Domiciliary, Nursing Home, and Hospital Care. These portions of the USC require among other things that the State applicant provide the Department of Veterans Affairs (VA) with an application.

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.

Only state governments and recognized federal tribes (their governments) will submit this information to complete an application for the State Veterans Homes Construction Grant Program (SVHCGP); private groups or citizens are not eligible. States electronically download the required package of forms. These forms are then completed and the applications submitted to the VA by mail with the original signatures. The signed forms provide state certification of compliance with VA grant requirements. VA will use this information, along with other documents submitted by the states, to determine the feasibility of the projects for VA participation, determine eligibility for a grant award and ranking on the annual fiscal year priority list that is signed by the Secretary of the Department of Veterans Affairs.

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.

These forms will be accessed and downloaded at the One-VA Forms Site (<http://www4.va.gov/vaforms/>), and <http://www.grants.gov> and VA's program office website. All forms will be signed and submitted electronically. VA will not accept paper copies of the forms because after the COVID-19 pandemic it is safer for staff to remain at home and forms can be

accesses and sent electronically which results in much faster review and processing by VA staff. These signed forms will provide State certification of compliance with VA grant requirements. VA will use this information, along with other documents submitted by the States to determine the feasibility of the project for VA participation and to rank the projects in establishing the annual fiscal year priority list. The priority list is the mechanism the VA uses to commit to State Home construction projects during the various fiscal years. This innovation has lessened the burden on the applicants and also on the Federal government and has improved consistency of the submissions.

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 provided by the various States to the program requirements is unique for each application and there is no duplication.

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

As these are submitted by State Governments or the governments of Federally recognized tribes, no small businesses or other small entities are impacted by this 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.

This information is collected only when a state government or federally recognized tribe wishes to apply to for a State Home Construction Grant. If this information was collected less frequently, VA would be unable to perform its statutory obligation to administer the program.

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 of Proposed Information Collection Activity was published in the Federal Register on February 28, 2023 (Vol. 88, No. 39, page 12721). VA received no comments in response to this notice.

The 30-day notice of Agency Information Collection Activity Under OMB review was published in the Federal Register on October 31, 2023 (Vol. 88, No. 209, pages 74565-74566).

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.

Not Applicable. Information requested is not patient specific.

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:

Annual Number of Responses	=	50
Annual Time Burden	=	1200 hours

We project 50 new applications annually, submitted by various states. The application package requires approximately 24 hours to provide the requested information and complete all of the forms.

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.

This request covers 12 forms:

10-0388-1: 6 hours

Documents and Information Required for State Home Construction and Acquisition Grants-Initial Application

10-0388-2: 1 hour

Certification of Compliance with Provisions of Davis-Bacon Act, (40 U.S.C. Sections 276a to 276a-7)

10-0388-3: 2 hours

State Home Construction Grant Program – Space Program Analysis – Nursing Home & Domiciliary

10-0388-4: 2 hours

State Home Construction Grant Program – Space Program Analysis – Adult Day Health Care

10-0388-5: 6 hours

Additional Documents and Information Required for State Home Construction and Acquisition Grants Application

10-0388-6: 1 hour

Certification of State Matching Funds to Qualify for Group 1 on the Priority List

10-0388-7: 1 hour

Certification Regarding Debarment, Suspension, and other Responsibility Matters – Primary Covered Transactions

10-0388-8: 1 hour

Certification Regarding Drug-Free Workplace Requirements for Grantees Other Than Individuals

10-0388-9: 1 hour

Certification Regarding Lobbying

10-0388-10: 1 hour

Certification of Compliance with Federal Requirements-State Home Construction Grant

10-0388-12: 1 hour

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion – Lower Tier Covered Transactions

10-0388-13: 1 hour

Documents and Information Required for State Home Construction and Acquisition Grants – Post Grant Requirements

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 VA Forms required for the application is composed of individuals who are requesting federal grant assistance to construct or renovate nursing homes or domiciliary facilities and are state or tribal government members, appointees, contractors or employees. 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 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 \$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.

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. VHA estimates the total cost to all respondents to be \$33,612 (1,200 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 cost to the Federal government is included in the overall management of the State Veterans Homes Construction Grant Program, which has a dedicated staff for program operations.

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

VA does not project any changes since our last 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.

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.