Supporting Statement for
Vocational Rehabilitation and Employment (VR&E)
Longitudinal Study Survey (OMB Control No. 2900-0786)

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 10, 2008, Congress passed the Veterans' Benefits Improvement Act (Public Law 110-389) to improve, enhance compensation and pension, housing, labor and education, and insurance benefits for Veterans. Section 334 of this law was amended by adding a 20-year longitudinal study requirement of Veterans who participated in the Vocational Rehabilitation and Employment (VR&E) program during fiscal years 2010, 2012, and 2014. This law also requires that the VA report to Congress annually on the long-term employment outcomes of Veterans.

In order to comply with the requirements of the law, the VA conducts a study that includes a 20-year longitudinal survey of a random sample of VR&E participants who began the program in FY2010, FY2012, and FY2014. VR&E program participants eventually leave the program (through successful rehabilitation or voluntary/involuntary withdrawal from the program) and the VA would have no other source of information on long-term outcomes, other than to contact them directly to find out about employment and other outcomes, as far as 20 years after program enrollment.

The law also specifies that the VA report annually to Congress (by July 1) on sixteen specific data elements. While administrative data maintained within the VBA can be analyzed to report one some of the fifteen elements, for some of the data elements, no data sources currently exist within VBA administrative files that collect the required information. To collect the data needed to fulfill these annual reporting requirements, the VA conducts an annual survey of a statistically valid random sample of three cohorts of VR&E participants (i.e., Chapter 31 participants who began a plan of services in FY2010, FY2012, and FY2014). The first survey collection began in FY 2012.

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 primary goal of the VR&E Longitudinal Study is to determine the longitudinal outcomes associated with community adjustment resulting from the VR&E program. The specific outcomes of interest in the mandate are (1) employment, (2) income, (3) home ownership, and (4) use of (need for) other program benefits, measured by receipt of Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI), unemployment benefits, or other public program benefits. As one's employment circumstances often changes over time, repeated measures of employment and community adjustment over time are typically more meaningful, providing a more accurate picture of the individual's employment situation. In addition to these outcomes, the contributing factors of interest include the number of program participants, average number of months served on active duty, disability ratings, types of benefits received, number of Veterans enrolled in education or training programs, and the average number of visits to VA and non-VA medical facilities each year.

The study employs two sources of data to measure the outcomes and contributing factors of interest: (1) administrative data currently residing within VBA administrative files and (2) self-reported survey data to be collected. Using data from these sources allows for more comprehensive analyses that provides better understanding of the long-term employment outcomes of VR&E participants.

VBA administrative datasets have the advantage of including data elements that are available on an entire study cohort population (e.g., all VR&E participants who began a plan of services in FY2010, FY2012, or FY2014) for a given fiscal year. Similarly, inclusion of SSA administrative data will provide an objective data source for all cohort members receiving SSA benefits. However, the primary source of data that will be used to assess long-term outcomes of VR&E participants is the self-report survey data that will be collected annually.

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.**

   Survey data is collected from all cohort groups using a combination of web, mail, and telephone administration. While the primary focus of the survey data collection approach will be to collect the data as a web survey, a paper-pencil mail mode is offered to those Veterans who do not complete the web survey, and computer-assisted telephone interviews (CATI) are conducted with those Veterans who do not complete the web or mail survey, or indicate they would prefer to complete the survey over the telephone.

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 measures for the study have been carefully reviewed to eliminate redundancy and duplication. There is currently no in-depth data available on VR&E program participants, from the program itself or from other VBA programs, which would provide sufficient detail on the long-term outcomes of VR&E participants, especially for the specific outcome measures outlined in the law.

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

   The collection of information does not involve small businesses or entities.

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.**

   Congress mandated this study to get a better understanding of the VR&E program, its benefits, and the areas that need improvement. Congress also required that the study include three cohorts of participants who began a plan of services in fiscal years 2010, 2012, and 2014; and that the VA report to them annually on specific outcomes and contributing factors of interest.

   If the collection is not conducted, the VA will be unable to meet the requirements of the Public Law. If the collection is conducted less frequently than once a year, it will be difficult to provide a yearly report to Congress that assesses changes in outcomes over time, and the effect the program has had on the lives of participants.

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.**

   The proposed data collection is consistent with 5CFR 1320.6 and therefore involves no special circumstances. Respondents will only need to provide a response once a year and will only need to submit answers to the survey and does not require any additional copies of any document. Respondents will not need to retain any records of their survey questions or anything else as part of this study. All information provided will be private to the extent of the law and will only be gathered for the purpose of completing the yearly report to Congress on the long-term outcomes of VR&E participants.

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 Department notice was published in the Federal Register on July 24, 2020, Volume 85, No. 143, page 44597 . No comments were received in response to this notice.

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

No payment or gifts will be given 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.

Respondents will be provided with a letter explaining the basis of this study, its importance, and their participation. The letter will also explain that participation in the study is voluntary, and that participant responses will be kept private to the extent of the law. The letter will state that the data collected will be used for research and statistical purposes, and any data reported will be in aggregate form only. More specifically, the letter will include the following assurance of confidentiality:

> The information that you supply is protected by law (the Privacy Act of 1974, 5 U.S.C. 522a and section 5701 of Title 38 of the United States Code) and any data collected will not impact any current or future benefits you may apply for.

Data security and confidentiality of electronic information will be ensured through proven standardized security configurations and methods that include state-of-the art certificate services and other infrastructure features.

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:

Based on previous experience with survey instruments with similar content, we estimate that it will take approximately 20 minutes for respondents to complete the annual surveys. Since the study covers a 20-year period, there are a total of 20 administrations across the full study period. The survey will be completed with 3,500 participants per cohort, for a total of 7,000 participants, for the first year of data collection which will include the initial survey for Veterans who began a plan of services in FY2010 (i.e., Cohort I) and FY2012 (i.e., Cohort II). Those same Veterans will be contacted again to complete the annual follow-up survey. The annual burden hours are 2,333.

a. Number of Respondents: 8,084
b. Frequency of Response: Annually
c. Annual Burden Hours: 2,695 hours
d. Estimated Completion Time: 20 Minutes
e. The respondent population for the annual survey is composed of Veterans who participated

in the Vocational Rehabilitation and Employment (VR&E) program during fiscal years 2010, 2012, and 2014. Survey response is completely voluntary. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is $25.72, making the total cost to the respondents an estimated $69,315.40. (2695 burden hours X $25.72 per hour). The wage information was taken from This information was taken from the following website: (http://www.bls.gov/oes/current/oes_nat.htm#00-0000, May 2019).

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. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is $23.86, making the total cost to the respondents an estimated $55,665.38. (2333 burden hours X $23.86 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There is no annual cost burden to respondents (beyond those shown in item 12 above) or recordkeepers resulting from the collection of information.

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 cost of data collection efforts associated with the burden described in item 12 has been included in the cost associated with a Firm-Fixed Price contract that was recently awarded to Economic Systems. There is no other cost for this study. The total cost of the contract for a base year + 4 option years is $2,792,285.30 (average of $558k annually). The last year of the current contract will begin in September 2020.

15. Explain the reason for any burden hour changes since the last submission.

Burden hours have increased as the number of respondents have increased.

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.

A report of findings are provided to Congress on a yearly basis. The report is made available online once Congress has reviewed and approved the report. Since the report is published online, there are no costs associated.

Data is gathered every year and per the Congressional mandate is submitted to Congress on July 1st for the duration of the study. Congress will provide an update if any changes to this schedule are needed. The table below presents a schedule that was used to conduct data collection for the FY 2019 Annual Report to Congress.

Item	Estimated Date
Data Collection	10/22/2019 – 01/14/2020
Data cleaning, processing, and analysis	01/21/2020 – 02/21/2020
Delivery of draft report to VA	03/13/2020
Submission to Congress	07/01/2020

This report includes information on study design, sampling methodology, participant characteristics, and their responses to survey questions to measure key outcomes of interest. Some of the data is supplemented by the VBA administrative datasets. To the extent possible, we will produce bivariate and multivariate analysis to explore the relationship between participant characteristics and key outcome variables. In the area of exploratory analysis, we will implement full range of techniques needed for descriptive examination. We will examine frequency distributions and relationships between variables using a variety of numeric, tabular, and graphic techniques (i.e., univariate frequencies, cross tabulations, etc.).

We will conduct univariate analysis of survey responses to identify variables that contain excessive amounts of missing data or have highly skewed distributions. Data elements that exhibit such characteristics are flagged and may be candidates for either imputation to provide values for some that are missing or transformations to modify skewed distributions. We will follow the distributional review with a bivariate examination of pairs of data elements. Depending upon the level of measurement and the research questions, Economic Systems might conduct correlation analyses (for two continuous variables), chi-square analyses (for two nominal variables, or analysis of variance (for the combination of continuous and nominal variables).

Beyond initial summaries of data elements, to the extent possible, we will implement other statistical approaches such as ANOVA and ANCOVA, regression modeling such as logistic and multinomial logistic regression, survival analysis, and factor analysis.

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

The VA is 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.

This submission does not contain any exceptions to the certification statement.

B. <u>Collection of Information Employing Statistical Methods</u>

As noted in item 16 above, To the extent possible, we will produce bivariate and multivariate analysis to explore the relationship between participant characteristics and key outcome variables. In the area of exploratory analysis, we will implement full range of techniques needed for descriptive examination. We will examine frequency distributions and relationships between variables using a variety of numeric, tabular, and graphic techniques (i.e., univariate frequencies, cross tabulations, etc.).

We will conduct univariate analysis of survey responses to identify variables that contain excessive amounts of missing data or have highly skewed distributions. Data elements that exhibit such characteristics are flagged and may be candidates for either imputation to provide values for some that are missing or transformations to modify skewed distributions. We will follow the distributional review with a bivariate examination of pairs of data elements. Depending upon the level of measurement and the research questions, Economic Systems might conduct correlation analyses (for two continuous variables), chi-square analyses (for two nominal variables, or analysis of variance (for the combination of continuous and nominal variables).

Beyond initial summaries of data elements, to the extent possible, we will implement other statistical approaches such as ANOVA and ANCOVA, regression modeling such as logistic and multinomial logistic regression, survival analysis, and factor analysis.