

Supporting Statement for:
Veteran and Spouse Transitional Assistance Grant Program (RIN 2900-AR68)
(OMB #: 2900-NEW)

JUSTIFICATION:

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

As part of P.L. 116-315, *the Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*, Congress established a grant program within the Department of Veterans Affairs (VA) to work with eligible, non-Federal organizations to provide transitional services to members of the Armed Forces who are separated, retired or discharged from the Armed Forces, and spouses of such members (i.e., VSTAGP participants). VA, through its Veterans Benefits Administration (VBA), proposes to execute this requirement as the Veteran and Spouse Transitional Assistance Grant Program (VSTAGP).

The proposed rule (RIN 2900-AR68, *Veteran and Spouse Transitional Assistance Grant Program*) will establish a regulation that will address: the purpose, the intended usage of grant funds, the general process for awarding a grant, the criteria for evaluating grant applications, priorities related to the award of a grant and other general requirements and guidance for administering and overseeing the VSTAGP.

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), establishes the record retention and access to records requirements fulfilled by this collection.

The VSTAGP recordkeeping collection will require a new control number to be assigned.

- 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.**

As the VSTAGP is a proposed program, no information has yet been collected. Once the final rule has been published and funding allocated, VSTAGP will collect information from grantees such as documents, papers, or other records which are pertinent to the Federal award, to make audits, examinations, excerpts, and transcripts. This also includes timely and reasonable access to grantee personnel for interviews and discussions related to such documents.

- 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**

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adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The collection of information would involve an electronic IT platform or collected in person while conducting site visits, as needed. Grantees would submit responses by uploading documents into the IT platform. The IT platform would act as the official record management system and provides a standard process for all grantees to submit information. The IT platform will also allow the VA and grantees to manage grants. **The IT platform has not been built yet.**

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 collected will specifically be related to VSTAGP grantees and participants. VA will access these documents to monitor grantees through desk audits and site visits. VA will use existing sources such as SAM.gov and the Federal Audit Clearinghouse to access grantee information and audits submitted by grantees who are required to submit single audit reports in accordance with 2 CFR 200, however, not all grantees will meet the single audit threshold. To properly monitor all grantees, VA will need access to grantee records not captured by existing sources and access to personnel to conduct interviews and discussions.

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 impact 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.

Due to Congress authorizing VA to establish a grants program and issue grants to eligible organizations providing transitioning services to members of the Armed Forces who are separated, retired or discharged and their spouses, VSTAGP is requiring grantees to collect and report information regarding the services provided. In addition, grantees are required to retain and provide access to the information in accordance with 2 CFR 200.

If the collection is not conducted, VA would not be able to ensure adequate oversight of the VSTAGP or report on the effectiveness of the program to Congress.

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

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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 is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publications 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 for public comment for 30 day comment on July 5, 2023, in 88 FR 42891, pages 42891-42900.

- 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.

- 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.**

The Privacy Act of 1974 balances the privacy rights of individuals with the necessity of the government's access to their information. The intent is to allow for the highest level of information accessibility while protecting individuals against unwarranted invasions of their privacy stemming from federal agencies' collection, maintenance, use and disclosure of personal information about them.

VA records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Veteran Readiness and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

Grants.gov will maintain only transmission records pertaining to the files. Grants.gov will not maintain application materials and data.

- 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**

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persons from whom the information is requested, and any steps to be taken to obtain their consent.

This report contains no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

- a. Total estimated number of respondents: 10 per year.
(10 respondents X 1 response)
- b. Frequency of response: Once.
- c. Annual burden hours: 1 hour.
- d. The estimated completion time for each form is 1 hour.
- e. The respondent population is composed of VSTAGP grantees who are required to provide VA, other Federal offices, and pass-through entities the right to access any documents, papers, or other records, including the ability to interview and discuss documents related to the program in accordance with 2 CFR 200. 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.

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. VBA estimates the total cost to all respondents to be \$280.10 (10 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).

This submission does not involve any recordkeeping costs.

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.

Estimated Costs to the Federal Government:

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Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
13	3	1	1.00	\$41.51	41.51	10	\$ 415.10
Overhead at 100% Salary							\$ 415.10
Processing / Analyzing Costs							\$ 830.20
Total Cost to Government							\$ 830.20

Overhead costs are 100% of salary and are the same as the wage listed above and the amounts are included in the total.

Note: The hourly wage information above is based on the hourly 2022 General Schedule (Base) Pay ([SALARY TABLE 2022-GS \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salaries-tables/)). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

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

N/A. As the VSTAGP is a proposed program, no information has yet been collected.

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.

The information collected is not for publication or tabulation use.

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

This report is not requesting 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.

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

B. Collection of Information Employing Statistical Methods

No statistical methods are used in this data collection.