

SUPPORTING STATEMENT A

**Telehealth Grant Program (THGP)**

**[AS20]**

OMB Control Number 2900-XXXX (NEW)

**Summary:**

- This is a new collection associated with AS20, and all burden hours are an increase.
- This collection consists of new VA Forms and surveys.
- \_\_\_ comments were received on the PRA section of the Proposed Rule.

**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 17, 2020, the Commander John Scott Hannon Veterans Mental Health Care Improvement Act of 2019, Public Law (P. L.) 116-171 (the Act), codified as a note to section 1720F of title 38, United States Code (U.S.C.), was enacted into law. Section 701 of the Act mandated that VA establish the Telehealth Grant Program for the expansion of telehealth capabilities and the provision of telehealth services to Veterans. This grant program will be established through the AS20 Telehealth Grant Program (THGP) regulation.

In order to award grants under this program, and assess compliance with grants provided, VA will require submission of Applications for grants and Renewals of grants, Grantee and Veteran Surveys, and Compliance Reports, including Performance, Financials, Budget/Plan Changes, and Corrective Action Plans (CAPs).

**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.**

Application: This information is needed to award telehealth grants to eligible entities. The application requirements are consistent with section 701 of the Act and are designed to ensure that VA can fully evaluate the ability of applicants to achieve the goals of the grant program.

To apply for a telehealth grant, an applicant must submit to VA a complete telehealth grant application package, as described in the Notice of Funding Opportunity (NOFO). VA will publish a NOFO in the Federal Register and Grants.gov identifying such items as the location for obtaining telehealth grant application packages; the date, time, and place for submitting completed telehealth grant applications; the estimated amount and type of funding available; the length of term for telehealth grant payments; and other information necessary for the telehealth grant application process as determined.

Renewal Application: This data collection instrument has been developed for grantees to renew grants previously awarded. The renewal application will allow VA to fully evaluate the ability of applicants to achieve the goals of the telehealth grants and proposed 38 CFR Part 84. This information will be used by VA to determine whether to award renewal funds to existing grantees.

Veteran Satisfaction Survey: This data collection instrument has been developed to capture Veteran feedback to evaluate the Telehealth Grant Program. This information will be used by VA to assess the experience of Veterans receiving services through the grant-funded Telehealth Access Point.

Grantee Satisfaction Survey: This data collection instrument has been developed to capture grantee feedback to provide more effective customer service and identify areas of improvement.

Compliance Reports: This information collection will be required to ensure grantees are complying with all program requirements set forth in proposed 38 CFR Part 80 and their grant agreements. These reports would allow VA to assess the provision of Telehealth Access Point under this grant program. These reports are Program & Budget Changes, Annual Performance Reports, Other Performance Reports, Other Financial Reports, and Annual Financial Expenditure Reports, and Corrective Action Plans which are submitted at close-out of annual award.

**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.**

The Initial Application and subsequent Renewal Application, Compliance Reports and Grant Agreements will require the use of Adobe Acrobat, Microsoft Word and Microsoft Excel (or comparable programs). A link to the initial application and renewal application will be made available on VA's website. The electronic format requires the use of the internet to access the forms and the use of Microsoft Excel to submit applicant budget. The Veteran and Grantee Surveys will be made available electronically to each participant by VA. Compliance Reports will be submitted electronically via the program grants management system. The use of technology reduces the burden of paperwork for the grantees and Veterans.

**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.**

This is a new VA program, and information contained within these forms is expected to be original and not a duplication of any other information previously received by VA.

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

Every effort has been made to minimize the burden to small entities by keeping questions simple and to a minimum on the initial application. The length of the proposed application has been deemed necessary to ensure that VA awards grants only to the most qualified eligible entities and follows the Act. This is also applicable to the Renewal Application. The use of electronic collection techniques will reduce the burden because it will avoid duplicating materials. Electronic submission also reduces costs associated with sending and handling mail.

The Veteran Satisfaction Survey will be used to survey individuals, so no small businesses or other small entities are impacted by the information collection. Every effort is being made with the Compliance Reports to minimize the burden to small businesses by keeping questions simple and to a minimum. The length of the proposed reports has been deemed necessary to ensure that grantees are conforming to program requirements. Program & Budget Changes and Corrective Action Plans will be submitted by grantees when necessary. Not all will be required to submit these; however, in instances in which modification of grant is necessary because of proposed significant changes to the grant program, or if actual telehealth grant expenditures vary from the amount disbursed or activities vary from the grantee's program description, these changes would be required.

The use of electronic collection techniques will reduce burden because it will be consistent and compatible with current reporting and recordkeeping practices. It makes appropriate use of information technology.

**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.**

Collection of the initial Applications and/or the Renewal Application must be conducted as part of the annual pre-award funding competition in order to distribute available telehealth grant funds or to renew grant agreements, provided funds are available.

VA would not be able to conduct annual program evaluation or formal assessment of the grant program if the Compliance Reports and other reports for the grant program collection were not conducted or were conducted less frequently.

Program & Budget Changes reports are necessary for VA to approve and ensure that such changes are consistent with proposed 38 CFR part 84 and the goals and intent of the Telehealth Grant Program. Corrective Action Plans will be required should the VA become aware of performance issues that needed to be resolved. These collections are not required of every grantee and in only limited instances.

**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 that we are currently aware of for this program. However, there is a possibility that the Telehealth Grant Program would receive inquiries from Congress that would require more frequent collections of information. At this time, we are not aware of any such inquiries from Congress.

**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 PRA section of the proposed rule constitutes the requisite 60-day notice of Proposed Information Collection Activity and was published in the Federal Register on November 13, 2024 at 89 FR 89519. VA received \_\_\_ comments in response to this notice.

The PRA section of the final rule constitutes the requisite 30-day notice of Agency Information Collection Activity Under OMB review and was published in the Federal Register on XXX XX, 20XX at XX FR XXXXX.

**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.**

VA has not consulted with any person or entity outside of VA. However, consultation with other VA Grants programs (Staff Sergeant Parker Gordon Fox Suicide Prevention Grant Program (SSG Fox SPGP), VHA Homeless Program Office Supportive Services for Veterans and Families (SSVF) and Grant Per Diem (GPD) was completed during the development phase of the program. Public comment will be sought through the 60-day and 30-day comment periods after publication of proposed rule and final rule, as identified in the 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.**

Grantees will not keep any medical records on the Veterans. These records are maintained exclusively by VA. VA, or other entities under a Memorandum of Understanding with VA, will provide services at the Telehealth Access Points through a secure internet application. The grantees will not have access to the Veteran’s medical or personal information.

Information in this data collection will become part of a system of records that complies with the Privacy Act of 1974. This system is identified as "Veteran, Patient, Employee and Volunteer Research and Development Project Records-VA (34VA12)" as set forth in the Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html>

**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:**

Total Annual Number of Responses: **1090**  
 Total Annual Time Burden: **2,418 hours**

VA Form	No. of Respondents	x No. of Responses	x No. of Minutes per	÷ by 60	Number of Burden
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				<b>Response</b>	<b>=</b>	<b>Hours</b>
Initial Application	65	1	(65)	1,500		1,625
Renewal Application	50	1	(50)	600		500
Veteran Satisfaction Survey	500	1	(500)	5		42
Grantee Satisfaction Survey	50	1	(50)	20		17
Compliance - Annual Performance Report	50	1	(50)	45		38
Compliance - Other Performance Report	50	2	(100)	30		50
Compliance - Annual Financial Report	50	1	(50)	45		38
Compliance - Quarterly Financial Report	50	4	(200)	30		100
Compliance - Program & Budget Changes	10	2	(20)	15		5
Compliance - Corrective Action Plan	5	1	(5)	30		3
<b>Totals</b>	880	<b>1090</b>				<b>2,418 hrs</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 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 \$31.48 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).

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. VA estimates the total cost to all respondents to be \$76,118.64 (2,418 burden hours x \$31.48 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 is \$50,400.

Information	No. of Submissions	GS Staff	Mins	Rate/hr	Cost
Initial Application	65	GS-13, Step 5	180	70	13,650
Renewal Application	50	GS-13, Step 5	120	70	7,000
Veteran Satisfaction Survey	500	GS-13, Step 5	1	70	583
Grantee Satisfaction Survey	50	GS-13, Step 5	5	70	292
Compliance - Program & Budget Changes	10	GS-13, Step 5	60	70	700
Compliance - Annual Performance Report	50	GS-13, Step 5	60	70	3,500
Compliance - Other Performance Report	50	GS-13, Step 5	60	70	3,500
Compliance - Other Financial Report	50X2	GS-13, Step 5	60	70	7,000
Compliance - Annual Financial Expenditure Report	50X4	GS-13, Step 5	60	70	14,000
Compliance - Corrective Action Plan	5	GS-13, Step 5	30	70	175
Totals	1080	NA	636	NA	50,400

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

These are new collections, 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.**

Application: VA does not intend to publish this data, except to notify the selected applicants of their grant award and announce to the public the list of grant awards. This form will be published along with the NOFO. Applicants must submit a complete application package within the timeframe specified in the NOFO. Once the application period is over, the information will be reviewed during an approximately 6-month VA evaluation period, after which telehealth grants will be awarded.

Renewal Application: VA does not intend to publish this data, except to notify the selected applicants of their grant renewal and announce to the public the list of grant awards. Grantees that intend to extend their grant award should submit a renewal consideration request within the 4<sup>th</sup> quarter of their current grant period.

Veteran Satisfaction Survey: VA does not intend to publish this data, which will be used to provide more effective service for Veterans and identify areas of improvement.

Grantee Satisfaction Survey: VA does not intend to publish this data, which will be used to provide more effective grantee customer service and identify areas of improvement.

Compliance Reports: VA does not intend to publish this data. Collections will occur on an annual and ad hoc basis upon execution of the grant agreements, in addition to Program Changes, Corrective Action Plans and Financial Expenditure Reports, as needed.

**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.