

SUPPORTING STATEMENT A

Program of Comprehensive Assistance for Family Caregivers (PCAFC)

VA Form 10-10CG

AR96

OMB Control Number: 2900-0768

Summary of Changes from Previously Approved Collection:

- The average annual number of responses and burden hours have increased based upon:
 - anticipated increase in caregiver applications and
 - addition of collections for certain types of discharges and requests for reassessments for continued PCAFC eligibility.
- VA received ___ comment(s) on the AR96 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.

Public Law (P.L.) 111-163, Caregivers and Veterans Omnibus Health Services Act of 2010 amended title 38 United States Code Chapter 17 by adding a new section, 1720G, "Assistance and Support Services for Caregivers." Section 1720G required the Department of Veterans Affairs (VA) to develop a Program of Comprehensive Assistance for Family Caregivers (PCAFC) and Support Services. Under the law, Primary Family Caregivers may be eligible to receive a stipend, access to health care coverage, mental health counseling, comprehensive caregiver education and training, and expanded respite services. Family Caregivers also may be eligible for travel benefits when they accompany the Veteran for care or attending training.

In order to administer these benefits to caregivers, it is necessary that VA receive information about the nature of benefit being sought and the persons who will be serving as caregivers and receiving benefits. This information is collected with VA Form 10-10CG. The AR96 regulation, in proposed 38 CFR 71.25(a), would require veterans, servicemembers and caregivers to submit a new joint application to participate in PCAFC and receive benefits. VA is proposing changes to PCAFC eligibility requirements. These changes are expected to result in an influx of new applications in the initial year of implementation, including from applicants who have previously applied and been denied. The number of applications submitted to VA is expected to fall back to more typical numbers after the initial influx.

In addition, requests for certain types of discharges will now be included in this information collection. Veterans or their Family Caregivers may request discharge from PCAFC. Such requests may be submitted in writing or verbally, to include the date such discharge should take effect. If such request for discharge is due to cases of domestic violence (DV) or intimate partner violence (IPV) by the Veteran against the Family Caregiver, the provision of a protective order, police report, or documentation by a treating provider of disclosure of DV or IPV may be provided to support the provision of extended benefits to the Family Caregiver upon the discharge.

AR96(P) also sets forth a process for eligible Veterans and Primary Family Caregivers to request reassessment for continued eligibility. While a written request is not required, if a written request is received, such written request may support an earlier effective date for any increased benefits for which the Family Caregiver may be eligible based on the reassessment.

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.

VA Form 10-10CG is used to apply for the PCAFC. The information collected is used to determine if a Veteran or active duty service member undergoing medical discharge qualifies for Caregiver Support Services and whether the individuals designated to serve as a Primary or Secondary Family Caregivers meet VA's criteria to serve in these roles.

The form is completed by the Veteran, active duty service member undergoing medical discharge, caregiver, or persons having power of attorney or legal guardianship as described in 38 C.F.R. § 17.32, Informed Consent and Advance Health Care Planning; and the Primary and/or Secondary Family Caregiver applicants. The form can be mailed, completed online, or hand carried to the VA. Individuals completing the form will certify that the information is correct and true to the best of their knowledge and belief.

Either Veterans or caregivers may request discharge from PCAFC, and such requests may be made verbally or in writing. The request should include the date of discharge and additional information regarding DV/IPV, if applicable. Requests for reassessment should be submitted in writing to PCAFC.

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 online application for the Program of Comprehensive Assistance for Family Caregivers is a fillable and fileable form with instructions and can be accessed at <http://www.va.gov/vaforms/medical/pdf/10-10CG.pdf>. If the online application fails to go through, the form is populated with the applicant information and ready for printing. The printed form can then be mailed, faxed or dropped off to VA.

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.

VA Form 10-10EZ, Application for Health Benefits and VA Form 10-10EZR, Health Benefits Renewal Form, under OMB Approval number 2900-0091, is used as VA's information collection for Veterans. The process for determining eligibility for the Program of Comprehensive Assistance for Family Caregivers and support services is initially based upon Veteran's eligibility. To avoid duplication of information collection, VA Form 10-10EZ or 10-10EZR will be submitted along with the 10-10CG form to determine Veterans' and Caregivers' eligibility. VA has cross-walked the 10-10CG form with the existing 10-10EZ and the 10-10EZR and reduced the amount of information requested on the 10-10CG, thereby removing duplicative data collection.

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

This collection of information will not have any impact on small businesses or other small 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.

VA's failure to collect this information would mean:

- a. Veterans and their Primary and Secondary Family Caregivers would not be allowed to apply for this benefit as authorized by Public Law (P.L.) 111-163, Caregivers and Veterans Omnibus Health Services Act of 2010, specifically, title 1, section 101 through 104.
- b. The failure to apply for and receive these benefits would result in: i) negatively affecting financial resources for the Caregiver; ii) reducing the quality of life and care for the Veteran; and iii) potentially limiting the health care options for Caregivers.

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 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 XXX XX, 20XX at XX FR XXXXX. 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.

Outside consultation is conducted with the public through publication of the PRA sections of the AR96 proposed and final rules in the Federal Register.

VA receives feedback through the course of assisting Veterans and Caregivers in completing the form and applying for PCAFC. In addition, outside consultation is conducted with the public through the rulemaking 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.

Assurances of privacy are contained in 38 U.S.C. 5701 and 7332. Respondents are informed that the information collected will become part of the Consolidated Health Record which complies with the Privacy Act of 1974. This is part of the system of records identified as 24VA19 “Patient Medical Record – VA,” “Enrollment and Eligibility Records —VA” (147VA16), and “Health Administration Center Civilian Health and Medical Program Records—VA” (54VA17) as set forth in the 2003 Compilation of Privacy act Issuances via online GPO access at <http://www.gpoaccess.gov/>.

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.

The only potentially sensitive information requested on the form is respondent’s birth sex, date of birth, and social security number. We do not believe this information would have an adverse effect on any individual’s mental or physical health if revealed to the individual. Potentially sensitive information may be collected where discharge is requested due to DV/IPV.

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

Total Annual Number of Responses:	145,181
Total Annual Time Burden:	35,451 hours

The number of responses and burden hours are broken down below:

a. The average annual number of applications, discharge requests, reassessment requests, and annual minutes and hourly time burden is estimated as follows:

Respondents	No. of respondents (annual)	x No. of responses	x No. of minutes per response	÷ by 60 minutes	Number of Burden Hours
PCAFC Application VA Form 10-10CG	140,671	1	15 min		35,168
Requests for Reassessment	2,800	1	3 min		140
Requests for Discharge	1,710	1	5 min		143
Total	145,181				~35,451 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 is composed of individuals who are applying for PCAFC. 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, 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.

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 \$1,115,997.48 (35,451 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 annual cost to the Federal Government is estimated at **\$1,769,004.90**. (35,451 hours x \$49.90 per hour, based on the Atlanta 2024 hourly rate table for a grade 12, step 5 employee).

This estimate is based on a total of 35,451 hours for administrative review by Caregiver Support Program staff. The time estimate is based on an average processing time of:

- 15 minutes for VA Form 10-10CG,
- 3 minutes for requests for reassessment, and
- 5 minutes for requests for discharge.

Information Collection	Processing Time	Total no. of Responses	Total Hours	Total Cost (\$49.90 per hour x total hours)
PCAFC Application	15 min.	140,671	35,168	\$1,754,883.2
Requests for Discharge	5 min.	1,710	143	\$7,135.70
Requests for Reassessment	3 min.	2,800	140	\$6,986
TOTAL		145,381	35,451	\$1,769,004.90

Note: The per hour rate of a GS 12/5 is based on the Atlanta 2024 salary rate table.

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

The AR96 regulation, in proposed 38 CFR 71.25(a), would require veterans, servicemembers and caregivers to submit a new joint application to participate in PCAFC and receive benefits. VA is proposing changes to PCAFC eligibility requirements. These changes are expected to result in an influx of new applications in the initial year of implementation, including from applicants who have previously applied and been denied. The number of applications submitted to VA is expected to fall back to more typical numbers after the initial influx.

In addition, requests for certain types of discharges will now be included in this information collection. Veterans or their Family Caregivers may request discharge from PCAFC. Such requests may be submitted in writing or verbally, to include the date such discharge should take effect. If such request for discharge is due to cases of domestic violence (DV) or intimate partner violence (IPV) by the Veteran against the Family Caregiver, the provision of a protective order, police report, or documentation by a treating provider of disclosure of DV or IPV may be provided to support the provision of extended benefits to the Family Caregiver upon the discharge..

AR96(P) also sets forth a process for eligible Veterans and Primary Family Caregivers to request reassessment for continued eligibility. While a written request is not required, if a written request is received, such written request may support an earlier effective date for any increased benefits for which the Family Caregiver may be eligible based on the reassessment.

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.

There are no plans to publish the results of the information collected.

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 display the expiration date on VA Form 10-10CG.

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.