

SUPPORTING STATEMENT A

Veteran Financial and Credit Counseling Services Survey

(VA Form 10-377)

OMB Control Number: 2900-0935

Summary of Changes from Previous Approval:

- The Survey has been updated to comply with EO 14168.
- This is a non-substantive change request; there are no changes to the numbers of respondents or burden hours.

A. JUSTIFICATION

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

The Joseph Maxwell Cleland and Robert Joseph Dole Memorial Veterans Benefits and Health Care Improvement (Cleland-Dole) Act of 2022 (P.L. 117-328), Section 313: Study on Financial and Credit Counseling, requires the U.S. Department of Veterans Affairs (VA) to conduct a study on financial and credit counseling by querying financial and credit counselors, homeless programs providers, and subject matters experts regarding the use of financial and credit counseling services. The intent of this survey is to identify financial and credit counseling needs of Veterans experiencing homelessness or at risk of experiencing homelessness, the financial and credit counseling services offered to these Veterans, the specific barriers that these Veterans have in accessing these financial and credit counseling services, and the effects of financial and credit counseling services on such outcomes as employment, housing status, income, and credit score. This information may inform VA about how to enhance financial and credit counseling services that are offered to Veterans experiencing homelessness or at risk of experiencing homelessness.

Members of the Association of Military Banks of America (AMBA), Association for Financial Counseling and Planning Education (AFCPE), Prudential's Pathways, and homeless programs were involved in the creation of this survey to ensure that the questions are formulated to answer the congressionally mandated questions and that financial and credit counselors, homeless programs providers, and subject matters experts regarding the use of financial and credit counseling services will be able to answer the questions in about 20 minutes.

The survey asks about respondents' age, sex, race, and ethnicity because these factors have the potential to influence the respondents' perception of the needs and barriers of Veterans experiencing homelessness or at risk of experiencing homelessness.

The results of this survey, which will not include personally identifiable information about the individual respondents, will be shared with Congress via a congressionally mandated report. It is due to VA clearance by January 15, 2025, and due to Congress by June 27, 2025.

The Veteran Financial and Credit Counseling Services (VFCCS) Survey (VA Form 10-377) has been updated pursuant to Executive Order 14168: *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*. There are no longer gender options, and the “Gender” field in Question 13 has been changed to “Sex” with only “Female or Male” as choices.

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 Cleland-Dole Act of 2022, Section 313: Study on Financial and Credit Counseling mandates the respondent types, which include financial and credit counselors, homeless programs providers, and subject matters experts regarding the use of financial and credit counseling services.

VA policy makers, program managers and process improvement investigators will utilize the information gained by this survey to assess the financial and credit counseling needs of Veterans experiencing homelessness or at risk of experiencing homelessness and the effects of financial and credit counseling services on such outcomes as employment, housing status, income and credit score as compared to the current financial and credit counseling services offered to these Veterans and any barriers these Veterans may experience in accessing these financial and credit counseling services.

This analysis will inform VA policy makers, program managers and process improvement investigators about gaps in existing financial and credit counseling services for Veterans experiencing homelessness or at risk of experiencing homelessness and will direct VA policy makers, program managers and process improvement investigators on how to improve financial and credit counseling services offered to Veterans experiencing homelessness or at risk of experiencing homelessness.

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.

VA will send emails to potential respondents informing them about the opportunity to take the online assessment for the survey.

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.

Neither this study, nor a similar study, has been conducted in the past; therefore, similar information is not available.

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 businesses by keeping questions simple and to an absolute minimum. Furthermore, the assessment is voluntary in nature.

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 would not be responsive to the needs of the vulnerable Veteran population that VA is charged to serve (i.e., Veterans experiencing homelessness and at risk of experiencing homelessness) and to the legal requirement to obtain the information requested in study. Specifically, VA would be in violation of not addressing Cleland-Dole Act of 2022, Section 313: Study on Financial and Credit Counseling which mandates that the VA conduct a study on financial and credit counseling as it relates to Veterans experiencing homelessness and at risk of experiencing homelessness by querying financial and credit counselors, homeless programs providers, and subject matters experts regarding the use of financial and credit counseling services.

As this survey has never been conducted previously, the question of administering the assessment less frequently does not apply.

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 July 25, 2023 (Vol. 88, No. 141, pages 47948-47949). No comments were received 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 10, 2023 (Vol. 88, No. 194, page 70001). No comments were received in response to this notice.

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.

Information on these forms 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:

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Financial and credit counselors	1000	20 minutes	333 hrs
Homeless programs providers	500	20 minutes	167 hrs
Subject matters experts	200	20 minutes	67 hrs
Totals	1700		~ 567 hours

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 only one assessment instrument, which will be used for several categories of respondents -- 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 \$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. VA estimates the total cost to all respondents to be \$15,881.67 (567 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 estimated annual cost to the Federal Government to create the assessment instrument, administer it, analyze the responses, and draft a report about the findings is based on the salaries and benefits associated with the VA employees who are involved in this process, as depicted in the below table.

GS Position	Salary Plus Benefits per Hour	Number of Hours to Create and Administer the Assessment	Cost
GS15	\$184	120	\$22,022
GS15	\$104	120	\$12,480
GS12	\$47	80	\$ 3,760
Total Cost			\$38,262

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

This is a new collection, 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.

The findings of this study will be published in a report to Congress. Analysis will consist mainly of frequency tabulations of study response selections. However, more complex analysis may be performed, such as multivariate analysis, depending on how much time will be available to perform the analysis. The final Congressionally Mandated Report (CMR) for the Cleland-Dole Act of 2022, Section 313, which will include the results of this study, is due to Congress on June 27, 2025; however, the CMR must begin the VA clearance process by January 15, 2025. Following OMB PRA clearance approval, the anticipated start date for administration of the study (i.e., data collection) will be late 2023/early 2024. End of data collection will occur approximately 12 weeks from the start of data collection.

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 the study instrument.

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.