

COLLECTIONS OF INFORMATION PROCEDURES

1. REASON FOR ISSUE: To establish procedures for implementing the Paperwork Reduction Act (PRA) of 1995 (Public Law 104-13 (May 22, 1995)); and to revise the Department of Veterans Affairs (VA) procedures formerly contained in VA Manual MP-1, Part II, Chapter 4, Forms Management.

2. SUMMARY OF CONTENTS/MAJOR CHANGES: The PRA of 1995 changed Federal agencies' procedures in several significant ways, and placed more explicit responsibilities on agencies in developing proposed collections of information and submitting them for Office of Management and Budget (OMB) review and approval.

a. The PRA requires agencies to seek public comment concerning proposed collections of information through a 60-day notice to the public before submission for clearance by OMB.

b. The Act requires VA to certify to OMB that the proposed collection reduces, to the extent practicable and appropriate, the burden on respondents for small business, local government, and other small entities, and for each recordkeeping requirement provide the length of time persons are required to maintain the records specified.

c. The Act redefines "collection of information" explicitly to include third-party and public disclosures.

d. The Act establishes annual goals for agencies burden reduction.

3. RESPONSIBLE OFFICE: Information Management Service (045A4), Office of the Assistant Secretary for Information and Technology.

4. RELATED DIRECTIVE: VA Directive 6310, Forms, Collections of Information, and Reports Management.

5. RESCISSION: This handbook rescinds MP-1, Part II, Chapter 4, Forms Management, dated October 7, 1991.

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

/s/
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Assistant Secretary for
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COLLECTIONS OF INFORMATION PROCEDURES

1. PURPOSE. This handbook provides guidance and outlines procedures for the management of collections of information activities. Instructions for developing a collection of information are included, as is the process for requesting Office of Management and Budget (OMB) review. It also supplements the policies and responsibilities prescribed in VA Directive 6310, Forms, Collections of Information, and Reports Management. Together, the handbook and the directive provide the necessary information to maintain an effective program.

2. GENERAL. Within VA, the Chief Information Officer has primary responsibility for implementing and overseeing compliance with the Paperwork Reduction Act (PRA) of 1995. In order to avoid possible disruptions of ongoing VA programs, the sponsoring organizational element must strengthen its internal measures for developing new collections of information. The Director, Information Management Service has program authority for:

a. Certifying that the collection of information is needed; is not unnecessarily duplicative; reduces, to the extent feasible, the burden on respondents; is written in clear and understandable terms; is to be implemented in ways consistent with existing reporting and recordkeeping practices of the respondent; and indicates for each recordkeeping requirement the length of time the information is to be retained.

b. Designating a VA Clearance Officer who will:

(1) Evaluate proposed information collection requests prior to submission to OMB for review;

(2) Ensure that the public or other affected parties have the opportunity to comment on the proposed information collection; and

(3) Serve as the liaison between VA and OMB on all matters relating to collections of information issues.

3. ITEMS GENERALLY CONSIDERED NOT TO BE INFORMATION. OMB regulations implementing PRA (5 CFR 1320.3(h)) define 10 categories of inquiry which generally are not deemed to constitute "information." These inquiries are considered "routine" and not burdensome to the respondent. Response to these requests rarely requires examination of records, and usually does not require much consideration to provide the correct answer. The 10 categories are:

a. Affidavits, oaths, affirmations, certifications, receipts, changes of address, consents, or acknowledgments; provided that they entail no burden other than that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument. (**Note:** A VA requirement for a certification in order to monitor or enforce compliance with regulatory standards would likely involve a covered collection of "information." Such a certification would generally entail burden in addition to that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument (see 5 CFR 1320.3(h)(1)).

- b. Samples of products or of any other physical objects.
- c. Facts or opinions obtained through direct observation by an employee or agent of VA or through non-standardized oral communication in connection with such direct observations.
- d. Facts or opinions submitted in response to general solicitations of comments from the public, published in the *Federal Register* or other publications, regardless of the form or format thereof, provided that no person is required to supply specific information pertaining to the commenter, other than that necessary for self-identification, as a condition of VA's full consideration of the comment.
- e. Facts or opinions obtained initially or in follow-on requests, from individuals (including individuals in control groups) under treatment or clinical examination in connection with research on or prophylaxis to prevent a clinical disorder, direct treatment of that disorder, or the interpretation of biological analyses of body fluids, tissues, or other specimens, or the identification or classification of such specimens.
- f. A request for facts or opinions addressed to a single person.
- g. Examinations designed to test the aptitude, abilities, or knowledge of the persons tested and the collection of information for identification or classification in connection with such examinations.
- h. Facts or opinions obtained or solicited at or in connection with public hearings or meetings.
- i. Facts or opinions obtained or solicited through non-standardized follow-up questions designed to clarify responses to approved collections of information.
- j. Like items so designated by OMB.

4. COLLECTIONS OF INFORMATION NOT SUBJECT TO PRA

- a. OMB review is not required whenever a VA organization wishes to obtain or solicit information from nine or fewer members of the general public, or State, local or tribal governments by means of identical questions. However, PRA requires such collections to include a statement indicating that the request is not subject to the requirements of PRA.
- b. OMB review is also not required for collections of information when:
 - (1) Conducting a Federal criminal investigation or prosecution;
 - (2) Disposing a particular criminal matter;

(3) Conducting a civil action to which the United States or any official or agency thereof is a party; or

(4) Conducting an administrative action or investigation involving an agency against specific individuals or entities.

5. COLLECTIONS OF INFORMATION SUBJECT TO PRA

a. Except for the types of collections discussed in paragraphs 3 and 4, OMB review and approval are required whenever a VA organization wishes to obtain or solicit information from 10 or more "persons" by means of identical questions. Approval is required, whether such collection of information is mandatory, voluntary, or required to obtain a benefit. This includes a requirement or request for persons to obtain, maintain, retain, report, or publicly disclose information. OMB approval must be requested in advance of the collection.

b. A collection of information includes the use of reports, applications, schedules, questionnaires, surveys, reporting or recordkeeping requirements, and other similar methods. Other methods of collecting information may include contracts, agreements, policy statements, plans, rules or regulations, planning requirements, circulars, directives, instructions, bulletins, requests for proposal or other procurement requirements, interview guides, disclosure requirements, labeling requirements, telegraphic or telephonic requests, and standard questionnaires used to monitor compliance with VA requirements.

c. A VA requirement to obtain or compile information for the purpose of disclosing such information to the public through posting, notification, labeling, or similar disclosure requirements, constitutes a collection of information. The same requirements to obtain or compile information would be a collection of information if the information were provided directly to VA. The public disclosure of information originally supplied by the Federal Government to the recipient (for the purpose of disclosure to the public) is now included in this definition.

d. Questions posed to agencies, instrumentalities, or employees of the United States are deemed collections of information if the results are to be used for general statistical purposes.

6. LENGTH OF OMB APPROVAL

a. OMB approval for new collections, revisions, extensions, reinstatements, and existing collections of information in use without a currently valid OMB control number may not exceed three years.

b. Emergency and/or expedited OMB approval may be granted for a period not to exceed six months.

7. CLEARANCE PROCESS

a. **Collections of Information Not Contained in Proposed or Current Rules.** The following outlines clearance procedures for collections of information not contained in proposed or current rules, such as questionnaires, application forms, and interview scripts:

(1) The Director, Information Management Service cannot certify a collection of information, not contained in a proposed or current rule, to OMB for review, until the sponsoring organization provides a 60-day advance notice in the *Federal Register*. In some instances, it may be necessary for the sponsoring organization to consult with the members of the public and affected agencies. In this notice, the sponsor is to solicit comments concerning:

- (a) The need for the information;
- (b) Its practical utility;
- (c) The accuracy of the burden estimates; and

(d) Ways to minimize burden, including the use of automated collection techniques or other forms of information technology.

(2) At the end of the 60-day period for seeking the advance public comment, the sponsor may send the information clearance package to the Director, Information Management Service for certification to OMB. Upon receipt, the Director, Information Management Service will notify the public, through a second *Federal Register* notice, that the collection of information was submitted for OMB review. The 30-day simultaneous notice is to:

- (a) State that OMB approval is being sought;
- (b) Direct requests for information, including copies of the proposed collection and supporting documentation, to Information Management Service;
- (c) Request that comments be submitted to OMB within 30 days of the notice's publication; and
- (d) Direct comments to the Office of Information and Regulatory Affairs of OMB, Attention: VA Desk Officer.

b. **Collections of Information in Proposed Rule.** The information clearance package for a collection contained in a proposed rule is to be submitted to OMB on or before the day on which the Notice of Proposed Rule Making (NPRM) is published in the *Federal Register*. The information clearance package is to include a copy of the proposed regulation and preamble.

(1) A proposed regulation containing a collection of information is to include in the preamble of the NPRM a notification that OMB review has been requested, and is to direct comments to the OMB Desk Officer. Publication of this information in the NPRM serves as the required public notice. If VA resubmits the collection of information to OMB at the final rulemaking stage, and has complied with the requirements of the PRA at the proposed stage, a second *Federal Register* notice is not required.

(2) The notice in the preamble to the NPRM is to include **both** the information required in the "60-day advanced *Federal Register* notice" and **also** in the "30-day simultaneous *Federal Register* notice." The notice is to direct comments to the Office of Information and Regulatory Affairs, OMB, Attn: Desk Officer for the Department of Veterans Affairs, and indicate that comments will be most useful if received by OMB within 30 days of publication.

(3) The sponsor is to inform respondents of the information as contained in paragraph 10.

c. **Collections of Information in Current Rules.** The clearance process for collections of information in current rules is very similar to the process for forms.

(1) Before the Director, Information Management Service can certify a collection of information contained in a current rule to OMB for review and approval, the sponsoring organization needs to provide 60-day advance notice in the *Federal Register* (see paragraph 7a(1)).

(2) At the end of the 60-day period for seeking the advance public comment, the sponsor may send the information clearance package to the Director, Information Management Service for certification to OMB. Upon receipt, the Director, Information Management Service will notify the public, through a second *Federal Register* notice that the collection of information was submitted for OMB review. The 30-day simultaneous notice contains the same information as described in paragraph 7a(2).

8. PLANNING THE SUBMISSION

a. When developing new collections or determining whether to continue existing ones, the sponsoring VA organization will:

- (1) Evaluate the need for each aspect of the collection of information;
- (2) Estimate the respondent burden associated with the collection of information; and,
- (3) If appropriate, test the collection of information through a pilot program.

b. In addition to the time VA organizations need to carry out their internal review and the public comment process, VA organizations should allow enough time for OMB to make its review and decision. OMB should be allowed an additional 30 days for public comment after it receives a VA submission and before it makes a decision.

c. For public comment and routine OMB review and approval, for both new and ongoing collections of information, the sponsoring VA organization needs to plan ahead by at least 120 days.

9. INFORMING THE RESPONDENTS

a. The sponsoring VA organization will inform respondents of the following:

- (1) Reasons the information is being collected;
- (2) Way information is to be used;
- (3) Estimated burden;
- (4) Whether responses are voluntary, required to obtain a benefit, or mandatory; and

(5) That VA may not conduct or sponsor a collection of information unless it displays a valid OMB control number. The respondent is not required to respond to a collection of information unless it displays a valid control number.

b. Depending on the nature of the collection of information, this information can be provided in the collection instrument, its instructions, the preamble of the regulation containing the collection of information, and/or an appropriate notice in the *Federal Register*.

(1) In the case of forms, questionnaires, instructions, and other written collections of information sent or made available to potential respondents (except in an electronic format), the information can be either on the instrument, as part of the instructions for such collection, or in a cover letter that accompanies the collection of information. Informing the respondents of the items required in paragraph 9a can be accomplished in a respondent burden statement. The statement may vary with each collection of information instrument.

(2) In the case of forms, questionnaires, instructions, and other written collections of information sent or made available to potential respondents in an electronic format, the information can be either in the instructions, near the title of the electronic collection instrument, or, for on-line applications, on the first screen viewed by the respondent.

(3) In the case of collections of information published in regulations, guidelines, and other issuances in the *Federal Register*, the information can be published in the *Federal Register* (for example, in the case of a collection of information in a regulation, by publishing such information in the preamble or the regulatory text to the final rule, or in a technical amendment to the final rule, or in a separate notice announcing OMB approval of the collection of information).

10. CERTIFICATION OF NON-DELINQUENCY BY APPLICANTS FOR FEDERAL ASSISTANCE (OMB CIRCULAR A-129)

a. VA application instruments or other collections of information that substantiate the awarding of financial assistance (including grants and contracts) must contain a certification that the applicant is not delinquent on loans or other accounts to the Federal Government. A notice of the penalties for falsification of this information must be included with the certification.

b. The following language can be used for a delinquency notice:

Are you presently delinquent or in default on any debt to the Federal Government (e.g., U.S. Guaranteed Student Loan, GI Bill Education Benefits, home or manufactured home mortgage or improvement loan, Small Business Administration Loan, Public Health Service loan, bond, loan guarantee)? [] YES [] NO. If “Yes,” give details, including date, name and address of lender, case or file numbers, and reasons for action.

11. PERSONAL IDENTIFIERS

a. When the collection of information requests a personal identifier (such as name, address, Social Security Number, or other personal information) that will be used as the key to retrieving information about that individual in a file, the collection and maintenance of that information is subject to the provisions of the Privacy Act of 1974. The collection of information will be developed in accordance with VA Handbook 6300.4, Procedures for Processing Requests for Records Subject to the Privacy Act. Other VA confidentiality statutes may also apply.

b. If the information is to be filed by such a personal identifier, and there is no established Privacy Act system of records covering the personal information being collected, a system of records must be established and a copy of the *Federal Register* notice announcing the proposed system of records must be attached to the Supporting Statement. These limitations concerning the use of a personal identifier as defined above must also be considered when VA imposes a recordkeeping requirement on a person to maintain such individual-specific records or a reporting requirement imposed to provide such information to another person or to VA.

12. PRIVACY ACT CERTIFICATION STATEMENT

a. When appropriate, the Supporting Statement must contain a certification that the information will be collected, maintained, and safeguarded in accordance with the provisions of the Privacy Act of 1974. Describe to the respondent any assurance of confidentiality and the basis for the assurance in statute, regulation, or agency policy. Cite the name, number of any Privacy Act System of Records notice(s) covering the information being collected.

b. Amendments to the Privacy Act System of Records notice(s) must be identified.

13. EMERGENCY OR EXPEDITED REQUEST

a. The Director, Information Management Service, may request OMB to authorize emergency or expedited processing of submissions of collections of information. Any such request to the Director shall be accompanied by a written determination that:

(1) The collection of information is:

(a) Needed prior to the expiration of time periods established for normal OMB review; and

(b) Essential to the mission of the agency.

(2) The sponsoring organization cannot reasonably comply with the normal clearance procedures because:

(a) Public harm is reasonably likely to result if normal clearance procedures are followed;

(b) An unanticipated event has occurred; or

(c) The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court ordered deadline to be missed.

b. The sponsoring organization shall:

(1) State the time period within which OMB should approve or disapprove the collection of information; and

(2) Submit information indicating that it has taken all practicable steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information.

c. The Director, Information Management Service, shall set forth in a *Federal Register* notice a statement that expedited or emergency OMB review is being requested, and the time period within which OMB should approve or disapprove the collection of information.

14. REQUESTING OMB REVIEW UNDER THE PRA

a. At least six months prior to the implementation of a new collection of information or the expiration of an existing one, the VA component sponsoring the collection will provide the VA Clearance Officer a “near” final copy of the OMB 83-I, Paperwork Reduction Act Submission, Supporting Statement, and a copy of the information collection instrument.

b. The information contained in the “near” final documentation will be used to develop the 60-day advance *Federal Register* notice.

c. At the end of the 60-day period for seeking the advance public comment, the finalized OMB 83-I, Supporting Statement, and all necessary documentation should be prepared as outlined in Appendix A, Supporting Statement for Paperwork Reduction Act Submissions.

d. Appendix B, Instructions for Completing OMB 83-I, should be used to complete this form. Attach to the OMB 83-I a copy of the information collection instrument, schedule or questionnaire, instruction, or other documents for which approval is requested, and a copy of the 60-day *Federal Register* notice, together with a copy of the appropriate section of each statute, regulation, or other document that establishes a recordkeeping, reporting, or disclosure requirement, that authorizes the collection of information.

e. An OMB 83-I and Supporting Statement will be prepared for collections of information contained in proposed or current rules. If the rule is in the “proposed” phase, attach a copy of the published *Federal Register* NPRM. For current rules, attach a copy of the printed version.

f. The original OMB 83-I and four copies of the Supporting Statement and other documents will be submitted to the VA Clearance Officer.

g. Upon receipt of the above PRA submission by the VA Clearance Officer, a 30-day *Federal Register* notice will be prepared advising the public that the collection of information has been submitted to OMB for review and approval.

h. The VA Clearance Officer will:

(1) Obtain the necessary certification from the Director, Information Management Service and submit the information collection to OMB for review; and

(2) Notify the sponsoring VA organization of OMB's decision, and furnish a copy of the action notice.

15. CUSTOMER SATISFACTION SURVEYS

a. Executive Order 12862, Setting Customer Service Standards, requires Federal agencies to conduct a series of qualitative and quantitative surveys to determine the kind of services its customers need, as well as customer levels of satisfaction with existing services. The surveys and focus groups will solicit voluntary opinions. They will not be used to collect information required to obtain or maintain eligibility for a VA program or benefit.

b. Customer satisfaction surveys and focus groups are tools for learning about agency services from the customer's prospective and should be well-defined, low-burden data collections. Traditional program evaluation addresses the objective outcomes of a program, while customer surveys and focus groups emphasize customer perceptions, preferences, and related opinions about an agency's performance.

c. Customer satisfaction information can become a valuable resource for identifying ways to improve the delivery of VA services. It is critical that they be designed for maximum efficiency and usefulness. This will help assure that surveys are consistent with the PRA, and the terms of clearance defined by OMB.

d. The public docket file at OMB must be updated prior to the survey's actual use and VA's Desk Officer at OMB has agreed to perform a quick turnaround for each submission. That time has been projected to be from one day for the simplest survey and up to two weeks for those that are more complex. It is important that all surveys and focus group scripts used under a generic clearance process are submitted to the Director, Information Management Service, prior to distribution. Each submission should include:

(1) A point-of-contact who can best answer questions regarding the content of the submission, and a proposed distribution date.

(2) A brief summary of objectives, specific burden estimates, and a final or near-final version of the survey instrument (focus group script, test questions, etc.).

16. INFORMATION COLLECTION BUDGET

a. VA program offices should evaluate their information collection activities on an ongoing basis. These evaluations should determine where respondent burden can be decreased (collecting the information less frequently, consolidating report instruments, or eliminating the collection in its entirety).

b. Each VA organizational element will develop and submit to the Director, Information Management Service, in such form, at such time, and in accordance with such procedures as OMB may prescribe, an annual comprehensive budget for all collections of information activities.

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

1. GENERAL INSTRUCTIONS. A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the *Federal Register*, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in paragraph 2a. If an item is not applicable, provide a brief explanation. When Item 17 of OMB 83-I is checked “Yes,” paragraph 2b of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

2. SPECIFIC INSTRUCTIONS**a. Justification**

(1) Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

(2) Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the sponsor has made of the information received from the current collection.

(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.

(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 paragraph 2a(2) above.

(5) If the collection of information impacts small businesses or other small entities (Item 5 of OMB 83-I), describe any methods used to minimize burden.

(6) Describe the consequence to Federal programs 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.

(7) Explain any special circumstances that would cause an information collection to be conducted in a manner:

- (a) Requiring respondents to report information to the sponsor more often than quarterly;
 - (b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - (c) Requiring respondents to submit more than an original and two copies of any document;
 - (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - (e) 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;
 - (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - (g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - (h) Requiring respondents to submit proprietary trade secrets, or other confidential information unless the sponsor can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.
- (8) 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 response to these comments. Specifically address comments received on cost and hour burden. Also:
- (a) Describe efforts to consult with persons outside VA to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.
 - (b) Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.
- (9) Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

(10) Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or VA policy.

(11) Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the sponsor considers the questions necessary, the 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.

(12) Provide estimates of the hour burden of the collection of information. The statement should:

(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

(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 of OMB 83-I.

(c) Provide estimates of annual cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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.

(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).

(a) The cost estimate should be split into two components:

1. A total capital and start-up cost component (annualized over its expected useful life); and
2. A total operation and maintenance and purchase of services component.

(b) The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as

purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

(c) If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

(d) Generally, estimates should not include purchases of equipment or services, or portions thereof, made:

1. Prior to October 1, 1995;
2. To achieve regulatory compliance with requirements not associated with the information collection;
3. For reasons other than to provide information or keep records for the government; or
4. As part of customary and usual business or private practices.

(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, operational 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.

(15) Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB 83-I.

(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.

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

(18) Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

b. **Collections of Information Employing Statistical Methods.** The sponsor should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the OMB 83-I is checked “Yes,” the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

(1) Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

(2) Describe the procedures for the collection of information including:

(a) Statistical methodology for stratification and sample selection;

(b) Estimation procedure;

(c) Degree of accuracy needed for the purpose described in the justification;

(d) Unusual problems requiring specialized sampling procedures; and

(e) Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

(3) Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

(4) Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

(5) Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of VA unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

INSTRUCTIONS FOR COMPLETING OMB 83-I

(NOTE: Answer all questions and have the Director, Information Management Service or designee sign the form. These instructions should be used in conjunction with 5 CFR 1320, which provides information on coverage, definitions, and other matters of procedure and interpretation under the Paperwork Reduction Act of 1995.)

1. AGENCY/SUBAGENCY ORIGINATING REQUEST. Department of Veterans Affairs, Information Management Service (045A4), Washington, DC 20420.

2. OMB CONTROL NUMBER

a. If the information collection in this request has previously received or now has an OMB control or comment number, enter the number.

b. Check “None” if the information collection in this request has not previously received an OMB control number. Enter the four-digit VA code 2900.

3. TYPE OF INFORMATION COLLECTION (CHECK ONE)

a. Check “*New Collection*” when the collection has not previously been used or sponsored.

b. Check “*Revision*” when the collection is currently approved by OMB, and the request includes a material change to the collection instrument, instructions, its frequency of collection, or the use to which the information is to be put.

c. Check “*Extension*” when the collection is currently approved by OMB, and the sponsor wishes only to extend the approval past the current expiration date without making any material change in the collection instrument, instructions, frequency of collection, or the use to which the information is to be put.

d. Check “*Reinstatement without change*” when the collection previously had OMB approval, but the approval has expired or was withdrawn before this submission was made, and there is **no change** to the collection.

e. Check “*Reinstatement with change*” when the collection previously had OMB approval, but the approval has expired or was withdrawn before this submission was made, and **there is** change to the collection.

f. Check “*Existing collection in use without OMB control number*” when the collection is currently in use but does not have a currently valid OMB control number. **NOTE: You must provide an explanation in paragraph 2 of the supporting statement as to why the collection is in use without an OMB number.**

4. TYPE OF REVIEW REQUESTED (CHECK ONE)

- a. Check **“Regular”** when the collection is submitted under 5 CFR 1320.10, 1320.11, or 1320.12 with a standard 60-day review schedule.
- b. Check **“Emergency”** when the agency is submitting the request under 5 CFR 1320.13 for emergency processing and provides the required supporting material. Provide the date by which the sponsor requests approval. **NOTE: You must submit an OMB Form 83-e explaining the reason(s) for emergency processing.**
- c. Check **“Delegated”** when the agency is submitting the collection under the conditions OMB has granted the agency delegated authority.

5. SMALL ENTITIES. Indicate whether this information collection will have a significant impact on a substantial number of small entities. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

6. REQUESTED EXPIRATION DATE

- a. Check **“Three years”** if the sponsor requests a three-year approval for the difference.
- b. Check **“Other”** if the sponsor requests approval for less than three years. Specify the month and year of the requested expiration date.

7. TITLE. Provide the official title of the information collection. If an official title does not exist, provide a description that will distinguish this collection from others.

8. AGENCY FORM NUMBER(S) (IF APPLICABLE). Provide any form number the agency has assigned to this collection of information. Separate each form number with a comma.

9. KEYWORDS. Select and list at least two keywords (descriptors) from the *“Federal Register Thesaurus of Indexing Terms”* that describe the subject area(s) of the information collection. Other terms may be used but should be listed after those selected from the thesaurus. Separate keywords with commas. Keywords should not exceed two lines of text.

10. ABSTRACT. Provide a statement, limited to five lines of text, covering the agency's need for the information, uses to which it will be put and a brief description of the respondents.

11. AFFECTED PUBLIC. Mark “P” for primary public and “X” for all categories that apply. Mark “Federal Government” only when the collection requires using statistical methods.

12. OBLIGATION TO RESPOND. Mark all categories that apply, denoting the primary obligation with a “P” and all others that apply with “X.”

a. Mark “*Voluntary*” when the response is entirely discretionary and has no direct effect on any benefit or privilege for the respondent

b. Mark “*Required to Obtain or Retain Benefits*” when the response is elective, but is required to obtain or retain a benefit.

c. Mark “*Mandatory*” when the respondent must reply or face civil or criminal sanctions.

13. ANNUAL REPORTING AND RECORDKEEPING HOUR BURDEN

a. Enter the number of respondents and/or record-keepers. If a respondent is also a record-keeper, report the respondent only once.

b. Enter the number of responses provided annually. For recordkeeping as compared to reporting activity, the number of responses equals the number of record-keepers.

(1) Enter the estimated percentage of responses that will be submitted/collected electronically using magnetic media (i.e., diskette), electronic mail, or electronic data interaction.

(2) Facsimile is not considered an electronic submission.

c. Enter the total annual recordkeeping and reporting hour burden.

d. Enter the burden hours currently approved by OMB for this collection of information. Enter zero (0) for any new submission or for any collection whose OMB approval has expired.

e. Enter the difference by subtracting line d from line c. Record a negative number (d larger than c) within parentheses.

f. Explain the difference. The difference in line e must be accounted for in lines f(1) and f(2).

(1) “*Program change*” is the result of deliberate Federal Government action. All new collections and any subsequent revision of existing collections (e.g., the addition or deletion of questions) are recorded as program changes.

(2) “*Adjustment*” is a change that is not the result of a deliberate Federal Government action. Changes resulting from new estimates or actions not controllable by the Federal Government are recorded as adjustments.

14. ANNUAL REPORTING AND RECORDKEEPING COST BURDEN (IN THOUSANDS OF DOLLARS). The costs identified in this item must exclude the cost of hour burden identified in Item 13.

a. Enter total dollar amount of annualized cost for all respondents of any associated capital or start-up costs.

b. Enter recurring annual dollar amount of cost for all respondents associated with operating or maintaining systems or purchasing services.

c. Enter total (14a + 14b) annual reporting and recordkeeping cost burden.

d. Enter any cost burden currently approved by OMB for this collection of information. Enter zero (0) if this is the first submission after October 1, 1995.

e. Enter the difference by subtracting line d from line c. Record a negative number (d larger than c) within parentheses.

f. Explain the difference. The difference in line e must be accounted for in lines (1) and (2).

(1) ***“Program change”*** is the result of deliberate Federal Government action. All new collections and any subsequent revisions or changes resulting in cost changes are recorded as program changes.

(2) ***“Adjustment”*** is a change that is not the result of a deliberate Federal Government action. Changes resulting from new estimations or actions not controllable by the Federal Government are recorded as adjustments.

15. PURPOSE OF INFORMATION COLLECTION. Mark all categories that apply, denoting the primary purpose with a “P” and all others that apply with “X.”

a. Mark ***“Application for benefits”*** when the purpose is to participate in, receive, or qualify for a grant, financial assistance, etc., from a Federal agency or program.

b. Mark ***“Program evaluation”*** when the purpose is a formal assessment, through objective measures and systematic analysis, of the manner and extent to which Federal programs achieve their objectives or produce other significant effects.

c. Mark ***“General purpose statistics”*** when the data is collected chiefly for use by the public or for general government use, without primary reference to the policy or program operations of the agency collecting the data.

d. Mark ***“Audit”*** when the purpose is to verify the accuracy of accounts and records.

e. Mark ***“Program planning or management”*** when the purpose relates to progress reporting and grants management, procurement and quality control or other administrative information that does not fit into any other category.

f. Mark ***“Research”*** when the purpose is to further the course of research, rather than for a specific program purpose.

g. Mark ***“Regulatory or compliance”*** when the purpose is to measure compliance with laws or regulations.

16. FREQUENCY OF RECORDKEEPING OR REPORTING

a. Check ***“Recordkeeping”*** if the collection of information explicitly includes a recordkeeping requirement

b. Check ***“Third party disclosure”*** if a collection of information includes third-party disclosure requirements as defined by 5 CFR 1320.3 (c).

c. Check ***“Reporting”*** for information collections that involve reporting and check the frequency of reporting that is requested or required of a respondent. If the reporting is on *“an event basis,”* check *“On occasion.”*

17. STATISTICAL METHODS. Check *“Yes”* if the information collection uses statistical methods such as sampling or imputation. Generally, check *“No”* for applications and audits (unless a random auditing scheme is used). Check *“Yes”* for statistical collections, most research collections, and scientific program evaluations. For other types of data collection, the use of sampling, imputation, or other statistical estimation techniques should dictate the response for this item. Ensure that supporting documentation is provided in accordance with Section B of the Supporting Statement.

18. AGENCY CONTACT. Provide the name and telephone number of the agency person best able to answer questions regarding the content of this submission.

19. CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSION. The Director, Information Management Service or designee signing this statement certifies that the collection of information encompassed by the request complies with 5 CFR 1320.9. Provisions of this certification that the agency cannot comply with should be identified and fully explained in Item 18 of the attached Supporting Statement. NOTE: The Office that *“develops”* and *“uses”* the information to be collected is the office that *“conducts or sponsors”* the collection of information (see 5 CFR 1320.3(d)).