

Supporting Statement for VA Form 28-1905c (2900-0176)
Monthly Record Of Training And Wages

A. Justification

1. For many chapter 31 rehabilitation program participants, the Department of Veterans Affairs (VA) must establish the type of instruction and which facility will provide it. The participant's program and attendance must be verified. VA Form 28-1905c, Monthly Record of Training and Wages, is provided to on-the-job training establishments and to trainers in certain special programs to maintain records of training progress. These types of on-the-job training programs most often do not have the approval of either the Department of Labor or a joint apprenticeship council. Also, these facilities do not usually have an extensive history of providing on-the-job training. However, VA does approve all training programs for chapter 31 participants. These facilities may also use this form to keep training records for participants training under 38 United States Code chapter 35. The authority to collect this information is in 38 United States Code 3104, 3111 and 3677.
2. On-the-job trainers use this form to maintain accurate records on participant's progress. Trainers in special programs also use this form. These special programs include training in the home and other individual instruction programs. These facilities often do not have an organized system of records sufficient for proper VA monitoring of a participants' progress. This information would otherwise be collected through personal interview, which would be more time consuming.
3. VA is implementing an electronic version of the VA Form 28-1905c allowing facilities to download and use this form from the Internet. This form has already been made available in Jet Forms for general use. The elements in this electronic application are the same as on the printed form. However, because this form requires both the signature of the trainer and the participant, it cannot be sent into the case manager electronically until a secure form of signature can be utilized with the VA.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency that maintains the necessary information, nor is it available from other sources within our Department. This form collects information that is vital for a veteran's progress toward their rehabilitation goals and for recording their monthly wages. Trainers submit the completed form on regular intervals to VA for review by the veteran's case manager. The review by the case manager ensures that the training provided corresponds to the veteran's individualized rehabilitation plan and that the veteran is making adequate progress in obtaining the skills needed as part of their vocational goal.
5. The collection of this information does not significantly impact small businesses or entities.

6. Less frequent collection of this information is not possible, as it involves documentation for each participant in a specialized type of training.
7. There are no special circumstances involved in this information collection that require collection in a manner inconsistent with 5 CFR 1320.6 guidelines except:
 - a. This is a monthly report primarily for on-the-job training participants. Most on-the-job training positions require a participant to train a minimum of three months. Therefore, the form must be completed and sent into the case manager on a monthly basis. Information from this form is used to track specific aspects of any training required by the vocational plan of services, which identifies the criteria for the training of the participant to become employed.
8. The Department form was published in the Federal Register on August 22, 2006, Volume 71 Number 162. There were no comments received.
9. Neither payments nor gifts are made to applicants under this collection of information.
10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22, "Compensation, Pension, Education and Rehabilitation Records – VA" as set forth in Privacy Act Issuances, 2001 compilation.
11. There are no questions of a sensitive nature.
12. Estimate of Information Collection Burden
 - a. Number of respondents is estimated at 4,800 per year.
 - b. Frequency of response is three times for most participants.
(14,400)
 - c. Annual Burden is 3,600 hours.
 - d. The estimated 15 minutes for completion time is based on long field experience observing trainers completing the form.
 - e. The total estimated cost to respondents is \$ 64,800.00 based on 3,600 hours X \$18.00 per hour.
13. Estimated of Annual Information Record-keeping Burden

These numbers differ from previous reports due to those numbers being artificially low. These numbers have been adjusted after the completion of the VA Vocational Rehabilitation and Employment Task Force Report was completed in late 2004. This task force report required the implementation of a new 5-track strategy for employment, targeting the area of rapid employment. The rapid employment strategy highlights short term on-the-job training for veterans coming home from war.

 - a. Number of estimated respondents at 4,800 per year.

- b. Frequency of response is three times for most participants.(14,400)
- c. Annual Burden is 3,600 hours.
- d. The estimated record-keeping burden of 15 minutes is based on long field experience with respondents maintaining the form.
- e. The total estimated cost of record-keeping is \$64,800.00, based on 3,600 hours times \$18.00 per hour.

14. Estimated Cost to the Federal Government

- a. \$ 38,400.00 estimated Vocational Rehabilitation and Employment Division cost for FY 2006 (4, 800 respondents X 15 minutes X \$32.00 (average GS 12/4 hourly wage rate)
- b. This form will now be available on both VA Intranet and the Internet and therefore further printing of the paper copies is not needed and thus eliminating any estimated printing cost.
- c. \$ 38,400.00 total cost to Federal Government.

15. There is a change in the reporting burden hours. There was a miscalculation on the previous report. It is corrected in this submission (see numbers 7 & 13).

16. VA does not tabulate nor does it intend to publish this information collection.

17. VA Form 28-1905c, the collection instrument, is the sole source for the collection of information vital to the training process. This form may be reproduced or stocked by the respondents and veterans service organizations. This form is submitted to OMB every three (3) years. As, such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the participants receiving assistance. By not displaying the expiration date, VA seeks to reduce its costs for collecting, processing and using the information. For these reasons, VA continues to seek exemption from displaying the expiration date on VA Form 28-1905c.

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

B. Collection of Information Employing Statistical Methods

1. The Veterans Benefits Administration does not collect information employing statistical methods.