

Supporting Statement for VA Form 28-8832(2900-0265)
Application for Counseling

A. Justification

1. VA Form 28-8832, Application for Counseling, collects information that the Vocational Rehabilitation and Employment (VR&E) Division needs to quickly assess the applicant's probable entitlement to counseling, to call up further records if necessary, and to contact the applicant to schedule a counseling appointment. Under 38 United States Code 501(a), the Secretary shall obtain information sufficient to establish the right to benefits.
2. A veteran or dependent may use this form as a convenience to apply for counseling services. Without the form, the application could be delayed, particularly in instances where incomplete data is submitted. The form was revised to collect information on both veterans and dependents eligible for Educational benefits under either Chapter 36 or 35.
3. VA implemented an electronic version of the VA Form 28-8832 allowing veterans to apply over the Internet. The elements in this electronic application are the same as on the printed form.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department. The collected information contains a claim for a specific benefit and is unrelated to other data base holdings.
5. The collection of this information does not impact small businesses or entities.
6. Less frequent collection of this information is not possible, as it involves application for a specific benefit.
7. There are no special circumstances involved in this information collection that require collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department form was published in the Federal Register on April 25, 2007 Volume 72, Number 79, page 20580-20581. 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 5100 per year.
 - b. Frequency of response is one time for most claimants.
 - c. Annual Burden is 2550 hours
 - d. The estimated 30 minutes for completion time is based on long field experience observing applicants completing the form.
 - e. The total estimated cost to applicants is \$ 38,250.00 based on 2550 hours X \$15.00 per hour.
13. This information collection imposes no recordkeeping burden on the public.
14. Estimated Cost to the Federal Government
 - a. \$ 45,900.00 estimated Vocational Rehabilitation and Employment Division cost for FY 2006 (5100 applications X 30 minutes X \$18.00 (average GS 7/4 hourly wage rate)
 - b. \$ 175.00 estimated printing cost.
 - c. \$ 46,075.00 total cost to Federal Government.
15. There is an increase in the burden hours due to the ongoing war in Iraq and the subsequent influx of claimants needing this benefit
16. VA does not tabulate nor does it intend to publish this information collection.
17. VA Form 28-8832, the collection instrument, is the sole source for the collection of information vital to the application process. This form may be reproduced or stocked by the respondents and veterans service organizations. This form does not display an expiration date, for to do so would result in unnecessary waste of existing stocks of this form. 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 benefit being sought. 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 28-8832.
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.