

**SUPPORTING STATEMENT FOR
VA FORM 28-1900
(2900-0009)**

Justification

1. VA Form 28-1900, Disabled Veteran's application for Vocational Rehabilitation, is used by service-connected disabled veterans and servicepersons awaiting discharge for disability to apply for vocational rehabilitation benefits available under chapter 31 of title 38 United States Code. It is the initial source of information to evaluate an applicant's claim for these benefits. Under 38 U.S.C. 501(a)(1) and 5101(a) and 38 CFR 21.30, VA requires a veteran submit the information to properly determine the veterans eligibility for and entitlement to these benefits.
2. The adjudication activity in the Veterans Service Center in a VA regional office evaluates the information on the form for completeness. An adjudicator then verifies the information against VA file data to determine if the claimant meets basic entitlement criteria. If so, the adjudicator creates a master record for the applicant. The adjudicator then forwards a summarized copy of the master record with the VA Form 28-1900 to the Vocational Rehabilitation and Employment (VR&E) Division. In some regional offices, this initial entitlement screening is done in the VR&E Division. Then the VR&E Division establishes a Counseling/Evaluation/Rehabilitation folder for the applicant and schedules him or her for an evaluation appointment with a counseling psychologist (CP) or a Vocational Rehabilitation Counselor (VRC). The CP or VRC uses the information on the application as a starting point to plan the initial evaluation sessions.
3. The VA has implemented an electronic version of the VA Form 28-1900 which is available in VONAPP, allowing veterans to apply over Internet. The elements in this electronic application are the same as on the printed form.
4. Reviews of this form have eliminated collection of information otherwise readily available to application processors. There is no known Department or Agency that maintains the necessary information; neither is it available from other sources within VA.
5. Collection of this information does not impact small business or other small 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 notice was published in the *Federal Register* on February 15, 2008 (Volume 73, Number 32), pages 8933-8934. There were no comments received.
9. Neither payment nor gifts are made to applicants under this information collection.
10. Clients are assured of confidentiality of their responses under Compensation, pension, education and Rehabilitation Records—VA(58VA21/22), contained in the Privacy Act Issuances, 1993 Compilation.
11. This form does not collect sensitive information.
12. Estimate of Annual Information collection burden
 - a. Number of estimated applicants: 67,844
 - b. Frequency of response 1
 - c. Burden hours 16,961
 - d. The estimated 15 minutes for completion time is based on long field experience observing applicants completing the form.
 - e. The total estimated cost to applicants is \$254,415, based on 16,961 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. \$355,841 Estimated Adjudication Division cost for FY 2000 (67,844 applications X 15 minutes X \$20.98 (average GS 9/4 hour wage rate of adjudicator in field station))
 - b. \$171,978 Estimated Vocational Rehabilitation and Counseling Division cost for FY 1996 (67,844 applications X 5 Minutes X \$30.42 (average GS 12/4 hourly wage rate of CP or VRC in field station))
 - c. \$1,356 Estimated printing cost
 - d. \$529,175 Total estimated cost to Federal Government
15. There is no change to the burden hours.
16. VA does not tabulate nor does it intend to publish this information collection.

17. VA Form 28-1900, 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. The form is submitted to OMB every 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 on VA Form 28-1900.

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