

Supporting Statement for VA Form 28-1905M  
(2900-0061)

**Justification**

1. The department of Veterans Affairs provides VA Form 28-1905m, Request for Supplies, to facilities offering rehabilitation services to veterans under 38 U.S.C. Chapter 31. This form simplifies these facilities' requests for authorization and certification of the need for supplies for rehabilitation program participants. Under 38 U.S.C. 501(a), VA has the authority to collect this information. This information collection supports the proper provision of supplies to Chapter 31 participants under 38 U.S.C. 3104(a)(7). VA needs this information collection to ascertain that the veteran needs the requested supplies, that the supplies are reasonable for the veteran's program, and that the veteran does not already own the supplies. Under 38 CFR 21.212, VA must strictly oversee the provision of supplies to rehabilitation program participants.
2. An official at the facility providing rehabilitation services completes the VA Form 28-1905m. This official certifies that the veteran needs the supplies on the form for his or her program and that the veteran is not requesting them merely because the veteran would like to have them. The veteran then attests on the form that he or she does not already have the supplies in a serviceable condition. Upon receipt of the completed form by VA, the veteran's case manager – who is familiar with the facility – reviews the form and authorizes VA payment for the supplies.
3. VA cannot use information technology to reduce this collection of information because VA must collect the information directly from each facility and rehabilitation program participant working together and then working with the veteran's case manager to authorize the proper supplies. The present method of collecting the needed information is the most efficient and causes the least burden to the public.
4. VA systems of records were researched. No other information collection of available system of records could provide this information to timely serve the rehabilitation program participant. The collected information contains a claim for payment of a specific benefit and is unrelated to other database holdings.
5. The collection of this information will not have a significant economic impact on a substantial number of small businesses or other small entities.
6. This oversight prevents abuse of VA payments for program supplies. If this information were not collected, a great potential would exist for abuse of VA payments for program supplies. The information cannot be collected less frequently because the requests for supplies are unique occurrences that need timely approval to avoid interference with the veteran's progress in his or her rehabilitation program.

7. The collection of this information is consistent with 5CFR 1320.6
8. The Department notice was published in the Federal Register on August 27, 2008, Volume 73, Number 167, Page 50672-50673. There were no comments received.
9. Neither payments nor gifts are made to respondents under this information collection.
10. The veteran or other eligible person is assured of confidentiality (38 U.S.C. 5701). VA may not use the collected information for any other purposes than to provide VR&E staff members with sufficient information to determine entitlement to payment for the listed supplies. VA cannot release the information the form collects outside VA without the claimant's written consent or unless the release is necessary for purposes that the law expressly allows, including the routing uses of information in *Compensation, pension, Education and Rehabilitation Records-VA (58VA21/22)*, in the Privacy Act Issuances, 1993 Compilation.
11. None of the questions on this form collect information of a sensitive nature.

12. Estimate of Annual Information Collection Burden

- a. Number of estimated respondents: 12,000
- b. Frequency of response: 1
- c. Burden hours: 12,000
- d. The estimated 60 minute for completion time is based on long field experience with respondents completing the form
- e. The total estimated cost to respondents is \$180,000, based on 12,000 hours X \$15.00 per hour

13. The form imposes no recordkeeping burden on respondents. Facilities will complete and submit 12,000 forms in any year.

14. Estimated Annual Cost to the Federal Government

- |   |           |
|---|-----------|
| a. Cost for review (12,000 forms X 30 minutes X \$31.06 hourly rate for average GS 12/3 case manager) | \$372,720 |
| b. Printing Cost  | 360.00    |
| c. Total Cost   | \$373.080 |

15. The respondent burden has not changed.
16. VA neither tabulates nor makes the information collected available for publication.

17. VA Form 28-1905m, the collection instrument, is the sole source for the collection of information vital to the training process. 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 three years. 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 29-1905m.

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

B. Statistical Methods

This data collection does not employ statistical methods.