

**SUPPORTING STATEMENT FOR VA FORM 28-1905h  
(2900-0034)**

**Justification**

1. The VA Form 28-1905h, Trainee Request for Leave-Chapter 31, Title 38 U.S.C., provides for leaves of absence from the Vocational Rehabilitation and Employment Program. VA must collect this information to ensure program participants are not abusing leaves of absence. The authority to collect the information necessary to manage the leave of absence accounting system is in 38 U.S.C. 501(a) and 3110.
2. VA Form 28-1905h serves as the only document for requesting leave and for providing the information necessary to determine whether to approve the leave request. A trainer or authorized school official must verify on the form the effect the absence will have on the veteran's progress in the program. The case manager (normally a vocational rehabilitation counselor) supervising the veteran's training program approves or denies the leave request. Upon approval, the veteran can receive subsistence allowance and other program services during the leave period as if he or she were continuing to attend training under CFR 21.270. Disapproval of the request may result in loss of subsistence allowance for the leave period. Failure to collect the information would create the potential for substantial abuse through receipt of benefits for unauthorized absences.
3. This form is available on the Internet in a fillable format.
4. There is no other information collection or available system of records that could provide this information to timely serve the applicants. The collected information contains a claim for a specific, time-constrained benefit and is related to other data base holdings.
5. The collection of this information does not have a significant economic impact on a substantial number of small business or other small entities.
6. If VA did not collect this information or collected it less frequently, there is a potential for abuse of the leave accounting system and erroneous payments of subsistence allowance.
7. The collection of this information is consistent with 5CFR 1320.6.
8. The Department notice was published in the Federal Register on October 28, 2008 on page 64015. Respondents have had a continuing opportunity to comment on the form, but no comments have been received.
9. No gift is made to respondents.

10. Confidentiality of responses is assured under *Compensation, Pension, Education and Rehabilitation Records-VA (58VA21/22)* in the Privacy Act Issuances 1999 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 | 30,000          |
| b. Frequency of response           | 1 (On occasion) |
| c. Burden hours                    | 7,500           |
| d. Annualized cost to respondents  | \$112,500       |

Long experience with the form shows that an applicant needs 15 minutes to complete the form. Consequently, the respondent burden is on the public is 30,000 responses times 15 minutes per response, or 7,500 hours.

13. The form imposes no record keeping burden on respondents.

14. Estimated cost to the Federal Government:

|   |          |
|---|----------|
| a. Cost of review (By GS 12/3 at \$31.06/Hour X minutes/form X 30,000 forms | \$77,650 |
| b. Printing, development, and and procurement cost                          | \$1000   |
| c. Total Cost   | \$78,650 |

15. There is no change from previously reported burden hours.

16. The results of this information collection will be neither tabulated nor published.

17. VA Form 28-1905h, 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 28-1905h.

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

B. Collection of Information Employing Statistical Methods.

1. The information collection does not employ statistical methods.