

## Supporting Statement for VA Form 28-1904

### Justification

1. VA Form 28-1904, Agreement To Train On The Job Disabled Veterans (Chapter 31, Title 38 United States Code) serves as a written agreement between an On The Job Training (OJT) establishment and the Department of Veterans Affairs. This agreement outlines that the OJT establishment will provide competent instruction, close supervision, maintain progress reports while the Department of Veterans Affairs will furnish tools, supplies and equipment and provide supervision to the disabled veteran. This agreement is necessary to ensure that the responsibilities of both parties are specified and communicated clearly. VA needs this information collection in order to assure that veteran's in these types of programs are receiving appropriate training and VA can authorize payment of tools, supplies and subsistence allowance as appropriate.
2. Both the Department of Veterans Affairs staff from the Vocational Rehabilitation and Employment (VR&E) Division and an official from the OJT establishment complete the VA Form 28-1904. The OJT program is a significant benefit to eligible veterans and the form needs to be used to ensure quality of an OJT placement and ensure that training establishments take responsibility.
3. VA cannot use information technology to reduce this collection of information because VA must collect the information containing original signatures directly from each OJT establishment providing services to veterans. The present method of collecting the needed information is the most efficient and causes the least burden to the public.
4. This agreement is used for each individual veteran participating in a training program at an OJT Establishment. This information is not available from any other source.
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. The information collection is obtained when each new veteran participating in an OJT program with each new training facility/vendor and cannot be collected less frequently.
7. The collection of this information is consistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on January 21, 2009, pages 3672-3673. There were no comments in response to this notice.
9. Gifts are not made to respondents under this information collection. Payment for services is made under guidance of 38 U.S.C. § 3116.

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 authorize a veteran's participation in a program with a training facility/vendor. 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 routine 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: 600
  - b. Frequency of response: 1
  - c. Burden hours: 150
  - d. It is estimated that it will take 15 minutes to review and complete this form
  - e. The total estimated cost to respondents is \$2,250 based on 150 hours X \$15.00 per hour
13. The form imposes light recordkeeping burden on respondents. Facilities should only complete and submit this form 1 time. However, in keeping with the agreement contained in this form, records of training must be kept and submitted to VR&E.
14. Estimated Annual Cost to the Federal Government
- a. Cost for review (600 forms X 30 minutes X \$31.06 hourly rate for average GS 12/3 case manager) \$9,318
  - b. Printing cost \$360
  - c. Total Cost \$9,678
15. There is no change in burden.
16. VA neither tabulates nor makes the information collected available for publication.

17. VA Form 28-1904, the collection instrument, is the sole source for the collection of information vital to the training process. 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 seeks exemption from displaying the expiration date on VA Form 29-1904.

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

B. Collection of Information Employing Statistical Methods

The collect of information does not employ statistical methods.