

Supporting Statement For
VA Form 28-1902w, Rehabilitation Needs Inventory
(2900-0092)

Justification

1. The VA Form 28-1902w is used by VA Vocational Rehabilitation Counselors (VRC) as a guide to the initial evaluation process. It also has limited use for counseling under other VA education benefit programs. The general authority to collect information to accomplish eligibility review and counseling is contained in 38 U.S.C. 501(a). The information is necessary to accomplish the mandate in 38 U.S.C. 3104(a) to provide educational, vocational, psychological, employment, and personal adjustment counseling that are part of the chapter 31 program.
2. The Rehabilitation Needs Inventory is to be mailed to the service-connected disabled veteran after the VA receives an application for vocational rehabilitation benefits. A cover letter provides contact information for an individual Vocational Rehabilitation Counselor who is assigned to case manager the Veteran's program and can provide assistance in completing the form. In the past, the information that would be gathered by using VA Form 28-1902 (which has been discontinued) was collected during multiple appointments with a counselor who followed an interview guide. Use of the VA Form 28-1902w will eliminate the need for multiple meetings with a VA counselor who can use the form to collect the information before or during the first interview. The Rehabilitation Needs Inventory takes approximately 45 minutes to complete.
3. The VA Form 28-1902w can be completed electronically and is available on the official VA website.
4. The information is not contained in any other VA records. The form requests personal information about a beneficiary's circumstances that will guide in the selection of the most appropriate training or other program objective.
5. The information collection does not involve small businesses or other small entities.
6. Veterans and other beneficiaries enter the information on the form to assist in an individualized counseling session or series of sessions. The information is unique to each client and must be collected for the first session or the counselor would not have enough information to properly evaluate and then to guide the client in selecting a program. The information is collected only once.
7. There are no special circumstances involved in this information collection.
8. The department notice was published in the Federal Register on February 10, 2010, page 6793. There were no comments in response to this notice.

9. VA does not provide payment or gifts to respondents.
10. Veterans and other beneficiaries are assured of confidentiality of their responses under Compensation, Pension, Education and Rehabilitation Records – VA (58VA21/22/28), contained in the current Privacy Act Issuance.
11. The form does not request sensitive information.
12. Estimate of Annual Information Collection Burden.
 - a. Number of estimated respondents: 60,000
 - b. Frequency of response: 1
 - c. Burden hours: 45,000
 - d. The estimated completion time of 45 minutes is based on field experience with respondents completing the form.
 - e. The total estimated cost to respondents is \$675,000, based on 45,000 hours x \$15.00.
13. This submission does not involve any recordkeeping costs.
14. Estimated Cost to the Federal Government
 - a. \$306,100 Estimated Vocational Rehabilitation and Employment Division cost for FY 2010 (60,000 cases x 10 minutes x \$30.61 (average counselor hourly wage).
 - b. \$3,000 Estimated printing cost of \$50.00 per thousand x 60,000
 - c. \$309,100 Total Estimated Cost to Federal Government
15. There is no change in burden.
16. VA does not tabulate nor does it intend to publish this information collection.
17. The collection instrument, VA Form 28-1902w, is the sole source for the collection of information vital to a counselor giving full consideration the veteran's vocational rehabilitation needs. This form does not display an expiration date and, if required to do so, would result in unnecessary waste of existing stocks of this form. This form is submitted to OMB every 3 years. As such, a date requirement would also result in delaying Department action on a claim for benefits or in a claimant receiving incomplete assistance. VA also seeks to reduce its cost for collecting, processing, and using the information by not displaying the expiration date. For these reasons, VA continues to seek exemption from displaying the expiration date on VA Form 28-1902w.
18. This submission does not contain any exceptions to the certification statement.

B. Statistical Methods

The data collect does not employ statistical methods.