

**SUPPORTING STATEMENT FOR VA FORM 28-1905
2900-0014**

A. Justification

1. The Department of Veterans Affairs (VA) is required to define the enrollment conditions and to certify pursuit and attendance for any chapter 31, rehabilitation or chapter 35, special restorative or specialized vocational training program. The information the facility provides to VA on the VA Form 28-1905, Authorization and Certification of Entrance or Reentrance into Rehabilitation and Certification of Status, ensures that individuals do not receive benefits for periods when they did not actually participate in the planned program. Facilities also affirm they will request payment only for properly established charges. The authority to collect this information is in 38 U.S.C. 501(a) and 3680(g), 38 CFR 21.294, and 48 CFR 871.201-2.

2. The VA case manager supervising the veteran's or other eligible person's program completes sections A and B of VA form 28-1905 to identify the program participant and to communicate the scope of the planned program to facilities providing the education, training, or other rehabilitation services. The form:

- Affirms that the facility's charges will accord with an existing contract or agreement
- Serves as the only contractual document for facilities without a formal contract or agreement
- Reminds all service providers of their reporting obligations

Under the terms on the form, the facility is entitled to submit vouchers for program participants to VA for payment of tuition, fees, books, and supplies.

A facility official then completes section C and returns the form to VA to certify that the veteran actually began the planned program of courses. Once VA receives the information, the case manager uses it to establish the correct beginning and ending dates and the correct rates for subsistence allowance payments under 38 U.S.C. 3108 and 38 CFR 21.320-322 and 21.332.

3. VA cannot use information technology to reduce this collection of information because VA must collect the information on each program participant directly from service providers. The VA database is antiquated and hinders technological advances. Moreover, VA would have to negotiate a separate Memorandum of agreement with each school or other service provider wanting to provide this data by an electronic data interface system.

4. VA systems of records were researched. VA is not aware of any other information collection that would provide the necessary information. The collected information contains a claim for a specific benefit for a designated period of training, education or other rehabilitation services and is unrelated to other data base 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. If VA did not collect this information or collected it less frequently, the potential for abuse of the chapter 31 and chapter 35 programs by participants would increase greatly because participants could be paid benefits for prolonged periods of nonattendance.
7. The collection of this information is consistent with 5 CFR 1320.6.
8. The Department notice was published in the Federal Register on June 30, 2011, pages 38460-38461. There were no comments received in response to this notice.
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 information collected for any other purposes than to provide the case manager with sufficient information to justify the payment of program benefits. The information collected may not be released outside VA without the claimant's written consent or unless the release is needed for purposes expressly specified by law, including the routine uses of information found in *Compensation, Pension, Education and Vocational Rehabilitation and Employment Records –VA (58VA21/22/28)*, which are contained in 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: 90,000
 - b. Frequency of response 1
 - c. Burden hours 7,500
 - d. The estimated 5 minutes for completion time is based on long field experience with respondents completing the form.
 - e. The total estimated cost to respondents is \$112,500, based on 7,500 hours X \$15.00 per hour.

13. The form imposes no recordkeeping burden on respondents. Facilities will complete and submit 90,000 forms in any year.

14. Estimated Annual Cost to the Federal Government

- a. Cost for review (90,000 forms X
5 minutes X \$32.92 hourly rate for
average GS 11/4 case manager) \$1,481,400
- b. Printing cost \$4,000
- c. Total Cost \$1,485,400

15. There is no change in burden.

16. VA neither tabulates nor makes the information collected available for publication.

17. VA Form 28-1905, 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 3 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 28-1905.

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

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.