

**SUPPORTING STATEMENT FOR
VA FORM 28-1917
(2900-0368)**

Justification

1. Under 38 U.S.C. 3108(C) (1) and 38 CFR 21.296, the Department of Veterans Affairs (VA) collects wage data monthly from employers providing on-the-job or apprenticeship training to chapter 31 veterans.
2. Establishments training veterans on-the-job or in apprenticeship programs use VA Form 28-1917, Monthly Statement of Wages Paid to Trainee (Chapter 31, Title 38 U.S.C.), to report each veteran's wages during the preceding month. VA Form 28-1917 is used specifically by training facilities that the Department of Labor or another approving agency has certified. These facilities have long-established and well-documented histories of providing on-the-job training. The veteran's case manager reviews the VA Form 28-1917 and uses the information to do the following:
 - (A) Determine whether the veteran is receiving the appropriate wage increase
 - (B) Ensure the veteran is receiving the correct rate of subsistence allowance
3. VA does not use improved information technology to reduce this collection of information because VA must collect the information on each program participant directly from the training provider.
4. There is no other information collection that would provide the necessary information. The collected information reports on a designated period of training and is unrelated to other database holdings. Before receiving the completed VA Form 28-1917, the veteran's case manager does not have verified information regarding the veteran's wages.
5. The collection of this information will not have a significant economic impact on a substantial number of small businesses or other small entities. The form collects only the minimum information necessary for program oversight and subsistence allowance award adjustment. In general, VA Form 28-1917 is used by larger, well-established enterprises with long-standing on-the-job apprenticeship programs.
6. VA does not have the authority to collect this information less frequently. The law requires monthly collection of the data (38 U.S.C. 3108 (C) (1)). In addition, lesser frequency of data collected would mean that VA could not ensure that veterans in on-the-job chapter 31 programs were making adequate wage progress toward their rehabilitation goals. This information collection justifies the payment of a specific benefit for a defined period. A less frequent verification of the veteran's wage rate could result in an overpayment that VA might have to waive based on the veteran's circumstances. Collection of a large indebtedness could jeopardize some veterans' program completion. An employer may use Item 7, "Remarks", on the form to identify a veteran's training problems. Disabled veterans, and particularly seriously disabled veterans, incur frequent

problems participating in training programs. By promptly bringing these problems to the case manager's attention, the form ensures that the case manager can timely intervene to assist the veteran. Without this information collection, the potential for abuse in these programs would increase.

7. There are no special circumstances that impose any exceptional burdens on respondents.

8. The Department notice was published in the *Federal Register* on September 28, 2011, page 60134. There were no comments in response to this notice.

9. Neither payment nor gifts are made to applicants under this information collection.

10. Clients are assured of confidentiality of their responses under Compensation, Pension, Education and Rehabilitation Records—VA(58VA21/22/28), contained in the Privacy Act Issuances, 1993 Compilation.

11. This form does not collect sensitive information.

12. Estimate of Annual Information collection burden

a. Number of estimated applicants: 300

b. Frequency of response monthly

c. Burden hours 1,800

d. The estimated 30 minutes for completion time is based on long field experience observing respondents completing the form.

e. The total estimated cost to respondents is \$27,000, based on 1,800 hours X \$15.00 per hour.

13. This information collection imposes no recordkeeping burden on the public.

14. Estimated Cost to the Federal Government is \$34,563 based on submission of 3,600 forms each year. Three-quarters of these (2,700) require only a review of 10 minutes by a case manager with an average grade of GS 12/3 (38.27 per hour) resulting in a cost of \$17,221.50. The remaining one-quarter (900) require 20 minutes of review and 10 minutes to prepare an award to adjust the benefit payment. The case manager's work for this latter activity costs \$17,221.50. Printing costs are estimated to be \$120.

15. There is no change in burden from the previous request for approval.

16. VA does not tabulate or intend to publish this information collection.

17. VA Form 28-1917, the collection instrument, is the sole source for the collection of information vital to the application process. This form may be reproduced or stocked by the respondents and veterans service organizations. 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. As such, this date requirement

would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. 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 on VA Form 28-1917.

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

B. Employing Statistical Methods

This data collection does not employ statistical methods.