

## Supporting Statement for VA Form 28-1903

### Justification

1. The Department of Veterans Affairs VA Form 28-1903, Contract For Training and Employment (Chapter 31, Title 38 U.S. Code) is necessary to facilitate the development of local contracting relationships between the VR&E Divisions at the Regional Offices and local vendors/facilities who can provide services to veterans under 38 U.S.C. chapter 31. This form standardizes these local contracts and ensures that they are consistent with Federal Procurement Regulations. VA needs this information collection in order to authorize training courses through these facilities.
2. Both the Department of Veterans Affairs staff from the Vocational Rehabilitation and Employment Division and an official at the facility providing training/rehabilitation services completes the VA Form 28-1903. Two witnesses must also sign the form. Due to an administrative oversight, the form is being used without an OMB number. This form needs to be used in order to facilitate formal contracting relationships with local vendors/facilities who can provide services to veterans.
3. VA cannot use information technology to reduce this collection of information because VA must collect the information directly from each facility/vendor containing original signatures of those 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 contract is only used for training facility/vendors who have not been previously approved to provide these services to veterans. 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. This oversight ensures compliance with the Federal Procurement Regulations. The information collection is collected 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 November 28, 2011, page 73020. There were no comments in response to this notice.
9. Gifts are not made to respondents under this information collection. However, payment for services is made as provided by the contract.

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 veterans 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 (58VA21/28)*, 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: 1200
- b. Frequency of response: 1
- c. Burden hours: 1200

d. It is estimated that it will take 60 minutes to review and complete this form

e. The total estimated cost to respondents is \$18,000 based on 1200 hours X \$15.00 per hour

13. The form imposes recordkeeping burden on respondents. Facilities must adhere to the parameters contained in the contract. However, the contract should be completed and submitted one time.

14. Estimated Annual Cost to the Federal Government

- a. Cost for review (1200 forms X 30 minutes X \$38.27 hourly rate for average GS 12/3 case manager) \$22,962
- b. Printing cost \$360
- c. Total Cost \$23,322

15. There is no change in burden.

16. VA neither tabulates nor makes the information collected available for publication. This is a new information collection.

17. VA Form 28-1903, the collection instrument, is the initial contract for the provision of services, is vital to obtaining 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 29-1903.

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.