

**EMERGENCY SUPPORTING STATEMENT FOR REQUEST FOR OMB  
APPROVAL  
UNDER THE PAPERWORK REDUCTION ACT OF 1995  
SUPPORTING STATEMENT**

**APPLICATION FOR PRIORITY OF SERVICE: Veterans Retraining  
Assistance Program**

**A. Justification**

*A.1. Circumstances that make the collection of information necessary.*

The information collection is requested to support the implementation of the Veterans Retraining Assistance Program (VRAP), authorized in Section 211 of the VOW to Hire Heroes Act of 2011 (PL 112-56). This benefit directs the Department of Veterans Affairs (VA) in cooperation with the Department of Labor (DOL) to pay for up to 12 months of a training program in a high demand occupation for unemployed eligible veterans between the ages of 35 and 60 as determined by DOL and VA. The program is to serve up to 45,000 veterans in fiscal year 2012, beginning July 1, 2012, and up to 54,000 veterans from October 1, 2012, through March 31, 2014.

DOL is required under the law to be the initial point of intake and conduct preliminary eligibility determinations, per the criteria noted below, prior to linking the applicants to the VA Application for VA Educational Benefits form (OMB Control Number 2900-0154):

- Applicant is at least 35 years old and not older than 60, at time of application;
- Applicant is unemployed, as of application date;
- Applicant was not and is not enrolled in any Federal or State job training program at any time during the previous 180-day period as of the application date, and;
- Application must be submitted no later than October 1, 2013.

On the integrated application, once an applicant is determined eligible by DOL, the applicant will be linked into the VA's Veterans On-Line Application (VONAPP), OMB Control No. 2900-0154, VA Form 22-1990, to finish the application and for VA to determine further eligibility (for example, verifying veteran status). If the applicant is determined ineligible, he/she will be notified and provided information on appeal rights.

Once an applicant is found eligible, she/he will be issued training resources through the VA. When the veteran completes or terminates training, the VA will notify the DOL, so that we may contact the veteran within 30 days after the

completion or termination of training. At this point in the process, DOL's key role will be to provide *employment placement* services to the veteran.

This process requires the collection of individual applicant data to be stored with VA. For DOL to conduct its eligibility determination required by the statute, the DOL will collect the following information on the "front page" of the VA application for VRAP::

- Last Name
- First Name
- Middle Initial
- Date of Birth
- Employment Status
- Participation in a Federal or State training program within the previous 180 days
- Date of Application

This information needs to be collected so that DOL can fulfill its statutory requirements to determine initial eligibility of the veteran and to allow state and/or local areas to contact the veteran to offer employment services within 30 days after she/he has completed or terminated training.

- VA and DOL are required by the law to report the total number of veterans who participated, the associates degrees or certificates awarded, and the employment status of the veterans.

By collecting this information and storing it with VA, DOL will fulfill its eligibility determination as well as provide a means for contacting the veteran, once he/she has completed or terminated training, to offer employment services. This data will serve the primary purposes of: 1) determining the total number of applicants, 2) providing the ability to hand-off and receive the individual data in a way that allows for verifying who went through and completed the training, 3) providing the individual's information to allow One-Stop staff to provide employment services to those who completed or terminated the training, and 4) reporting the employment status of the individuals who participated in the program. The eligibility determination for employment status, date of last employment, and enrollment in a Federal or state job training program will be determined through self-attestation. Applicants will confirm through an affidavit that their attestations are true, and made aware of any penalties they may be subject to for knowingly falsifying their application.

**Justification for Seeking Emergency Approval:** ETA seeks emergency clearance from OMB for approval of the individual applicant data collection because the VRAP program has a required start date of July 1, 2012. The application system must be in place well before the program start date in order to provide program outreach to veterans and technical assistance to DOL grantees.

The VRAP was signed into law on November 21, 2011 and required an extensively negotiated Memorandum of Agreement (MOA) between VA and DOL in order to implement the program. The MOA will not be signed by both parties until the end of February, 2012. ETA seeks emergency clearance by March 20, 2012, so that the full electronic application system can be tested and in place in time to begin accepting applications in May for training to commence on or after July 1, 2012. This requires an expedited process for building a system and collecting individual data with the capacity to serve up to 45,000 veterans between July 1, 2012 and September 30, 2012. Failure to be able to collect individual data would jeopardize the ability for applicants to complete an application, which will collect eligibility information required under the statute. Inability to collect individual applicant information will also jeopardize the ability of DOL to offer employment services required under the law.

*A.2. How, by whom, and for what purpose the information is to be used.*

To meet its statutory responsibilities for VRAP under the VOW to Hire Heroes Act of 2011, the Department requests approval to collect information pertaining to applicants for the VRAP benefit. The Department will use the information collected to determine program eligibility, link eligible applications to VA, offer employment services upon completion or termination of training, and report the employment status of program participants required by the law.

To streamline the application process for the applicant, DOL and VA are working to create a seamless system. This system leverages VA's existing application system and merges DOL's new data collection into one process. The applicant will fill out the application in one sitting and online.

*A.3. Extent to which collection is automated, reasons for automation, and considerations for reducing impact on burden.*

Information technology is being used to reduce the burden. Applicants will be able to apply online for the program, and can still go to a DOL funded One-Stop Career Center for additional services or online resources to apply for the program. This system allows DOL to avoid collecting information that is not necessary to determine eligibility as required of DOL by the statute, and thus reduces the burden on the applicant.

*A.4. Efforts to identify duplication – why similar information already available cannot be used for purpose described in A.2.*

The individual data being sought is for a new program requiring a new system of reporting. The funding for the training benefit is funded by VA, and requires DOL to be the initial entry point for the application.

*A.5. Efforts to minimize burden on small businesses.*

The information collection involves only individuals (veteran applicants). There is no impact or burden on small businesses.

*A.6. Consequences to Federal program if collection not done or done less frequently and any technical or legal obstacles to reducing the burden.*

Under the VOW to Hire Heroes Act of 2011 (PL 112-56), DOL is required to determine initial eligibility for the VRAP. If this information is not collected, DOL will be unable to determine the four elements of eligibility required under the law. The information will be collected as applicants apply, and only once. This solution reduces the technical or legal obstacles to reducing the burden.

*A.7. Special circumstances for conducting information collection.*

There are no special circumstances that would require the information to be collected or kept in any manner other than those normally required under the Paperwork Reduction Act.

*A.8. Summary of public comments.*

An emergency review notice will be published in the Federal Register to allow the public to comment on this submission. In addition, the public will have an opportunity to comment again when this information request is resubmitted under regular procedures.

*A.9. Explanation of decision to provide any payment or gift to respondents.*

DOL does not provide any payment or gift to respondents.

*A.10. Assurance of confidentiality provided to respondents.*

ETA is responsible for protecting the confidentiality of any data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy and Freedom of Information Acts. Privacy Act information will be made available through the VA Web site.

*A.11. Justification for any sensitive questions.*

DOL will collect no sensitive information.

*A.12. Estimated hourly burden.*

DOL estimates the burden for answering DOL's eligibility questions to be 5 minutes per applicant, with 100,000 applicants annually for a total annual burden estimate of 8,300 hours. The program is designed to serve a maximum of 99,000 veterans over a less than two year period. DOL anticipates a maximum of 200,000 applicants for the two year program.

DOL estimates the maximum annual "opportunity cost" burden for applicants for responding to these eligibility questions at the current unemployment rate of \$7.25 to be (5 minutes = .083 hours x \$7.25 = \$.60 x 100,000 applicants = \$60,000) \$60,000.

*A.13. Estimated cost burden to respondents.*

There is no additional cost to respondents other than that reported in #12 above.

*A.14. Estimated cost burden to the Federal government*

The estimated cost to the Federal government is largely based on the addition of four new information fields that VA will collect online at the time of the veteran's application (OMB 2900-0154, VA Form 22-1990, Application for Education Benefits) and then shared with DOL as veterans complete or terminate from training; those costs, which are anticipated to be minimal, consist mainly of adding the questions to the existing electronic information collection, VA Form 22-1990. Any costs then determined will be submitted to OMB/OIRA in a non-substantive change request.

*A.15. Reasons for any program changes reported in Items 13 or 14 of the OMB Form 83-1.*

This is a new information collection request.

*A.16. Method for publishing results.*

VA and DOL are required to report to Congress 1) the number of participants in the VRAP program, 2) the degrees/certificates/credentials awarded, and the employment status of the participants under the statute.

*A.17. If seeking approval not to display the expiration date for OMB approval, explain why display would be inappropriate.*

The Veterans Affairs Department will display the expiration date for OMB approval.

*A.18. Explanation of each exception in the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions" on OMB Form 83-1.*

The Department is not seeking any exception to the certification requirements.

**B. Collection of Information Employing Statistical Methods**

This information collection request employs no statistical methods.