

**SUPPORTING STATEMENT, OMB Control No. 1205-0491  
APPLICATION FOR PRIORITY OF SERVICE: Veterans Retraining  
Assistance Program, Extension Request**

**A. Justification**

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

This information collection supports 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 will 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 is 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 is 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 notifies 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 determine eligibility as required by the statute, DOL collects 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 is 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 fulfills 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 serves 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 is determined through self-attestation. Applicants confirm through an affidavit that their attestations are true, and are made aware of any penalties they may be subject to for knowingly falsifying their application.

*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 collects information pertaining to applicants for the VRAP benefit. The Department uses 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.

*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 are 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.

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 fills out the application in one sitting and online.

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

The funding for the training benefit is funded by VA, and requires DOL to be the initial entry point for the application. As mentioned in item 3, this system leverages VA's existing application system and merges DOL's new data collection into one process. The applicant fills out the application in one sitting and online.

*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 is collected as applicants apply, and only once.

*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.*

As required by 5 CFR 1320.8(d), a notice for sixty days' public comment on this information collection was published in the *Federal Register* on May 24, 2012 (Vol. 77, p. 31042). One comment was received. The comment was in three sections, and ETA responded to each; please see the table below:

<b>Comment</b>	<b>Agency Response</b>
This information is in line with the performance of the State Workforce Agency. The information has practical utility to the State Workforce Agency. If the Veteran is registered with the State Workforce Agency, this information has already been captured.	This comment is in agreement with DOL's approach to collect applicant information.
If the veteran is seen by the State Workforce Agency prior to completing the VONAPP, this information is easily obtained, because this information should already be in agency records. However, if the veteran self enters the information from home etc and self attests that the information is correct, but has never been to a State Workforce Agency, confirmation of this information could be very difficult and create a burden on the State Agency.	DOL is verifying the veteran's eligibility through self-attestation. There is no state or local burden for verifying applicant eligibility.
Collection of the information from the veteran is already done using information technology through VONAPP. Any additional information collection from the State Workforce Agency concerning verifying the veteran's information could be made through using something like a centralized website, accessible only by the workforce agencies. This would speed processing.	DOL is developing a centralized secure File Transfer Protocol (sFTP) site for the State Workforce Agencies to access the participant data to perform outreach. This information collection is solely for the purpose of verifying applicant eligibility, of which there is no state or local burden.

*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 keeping the data private and maintains the data in accordance with all applicable Federal laws. The Veterans Administration provides Privacy Act information through the VA Web site.

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

DOL collects 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 8,333 hours. 100,000 responses x 5 minutes/60 minutes per hour. 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 60,414.  $8,333 \times \$7.25$ .

*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*

DOL incurred no cost burden for this information collection. The VA modified their Veterans Online Application (VONAPP) to ask for the eligibility fields required by DOL in the application (OMB 2900-0154, VA Form 22-1990, Application for Benefits). This consisted of adding the 4 eligibility questions to their existing application.

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

There are no changes.

*A.16. Method for publishing results.*

VA and DOL are required to report to Congress by July 1, 2014 on 1) the number of participants in the VRAP program, 2) the degrees/certificates/credentials awarded, and 3) the employment status of the participants under the statute. DOL will report on the employment status of VRAP participants using the Labor

Exchange Reporting System (LERS), which is used to report on individuals registered into the Wagner-Peyser program.

*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.