

Supporting Statement for Request for
Transportation Expense Reimbursement (38 CFR 21.8370)
OMB control number 2900-0580
(Not associated to a VA Form)

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

This information collection is authorized under Title 38 U.S.C., Chapter 18 (as amended by Section 401, Public Law 106-419, November 1, 2000), which provides vocational training benefits for children of Vietnam Veterans born with spina bifida and certain birth defects. 38 CFR 21.8370 authorizes VA to pay for transportation services necessary for an eligible child to pursue a vocational training program. Please note that the information may be collected by completing the form in a website.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

The travel beneficiary must specifically request VA assistance with transportation expenses. The beneficiary must provide supportive documentation or receipts of actual expenses incurred for the travel to receive payment. This prevents VA from making erroneous payment or authorizing fraudulently travel claims.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

There is no set format for this request for benefits. The application must provide certain information to perfect the claim. We are unaware of any way that information technology can reduce the small burden imposed by this collection of information.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Similar information is not available from other sources. VA does not currently possess and is not aware of an alternative source for the required information.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The collection of information does not involve small businesses or entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

The information is unique to each child and must be collected. There is no special reporting format. The information collection is accomplished on a one-time basis per individual applicant for the initial request and monthly to obtain travel reimbursement.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission

to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notice was initially published in the Federal Register on August 29, 2014, Volume 79, Number 168, page 51654. There were no comments received. An additional Department notice was published in the Federal Register on November 17, 2014, Volume 79, Number 221, page 68510. There were no comments received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts will be made to respondents.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Collected information will be kept private to the extent permitted by law.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

Estimate Information Collection Burden

a. Number of estimated respondents: 50

b. Frequency of Response: Monthly

- c. Estimated annual burden: 60 hours
- d. Estimated Completed Time: Six (6) minutes
- e. According to the U.S. Bureau of Labor Statistics, Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents \$1,440 (60 burden hours x \$24 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated Cost to the Federal Government

- a. Processing/Analyzing costs
Annual burden hours (60) x \$38.27/hour by a Counselor with an average grade of GS-12/3] = \$2,296.20.
- b. Forms are available on the VA inter/intranet forms websites and will not be centrally stocked.
- c. Printing and Production Cost = \$0.00
- d. Total cost to government =
\$2,296.20

15. Explain the reason for any burden hour changes since the last submission.

The number of respondents is changed since historical data shows between 50-70 active Chapter 18 beneficiaries at any given time

and has remained at least for 5 years. The corresponding estimations were made to the annual burden.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collection is not for publication or tabulation use.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The public can find the affected part of the Code of Federal Regulations by searching for the OMB information collection number (2900-0580). 38 CFR 21.8370 shows the OMB information collection number but does not contain an expiration date. This information collection will be submitted to OMB every three years for approval. Revising and reprinting the affected pages of these regulations to show an expiration date would result in a costly waste of existing stock and would delay Department action on the benefit being sought. By requesting an exemption from displaying the expiration date in these regulations, VA can minimize the cost to itself. VA seeks a continued exemption from displaying the expiration date on the pages of 38 CFR 21.8370.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.