

**SUPPORTING STATEMENT FOR VA FORM 28-1905
2900-0014**

A. Justification

1. The Department of Veterans Affairs (VA) is required to define the enrollment conditions and to certify pursuit and attendance for any Chapter 31, rehabilitation or Chapter 35, special restorative or specialized vocational training program. The information the facility provides to VA on the VA Form 28-1905, Authorization and Certification of Entrance or Reentrance into Rehabilitation and Certification of Status, ensures that individuals do not receive benefits for periods when they did not actually participate in the planned program. Facilities also affirm they will request payment only for properly established charges. The authority to collect this information is in Title 38 of the United States Code (U.S.C.) 501(a) and 3680(g), Title 38 of the Code of Federal Regulations (CFR) 21.294, and 48 CFR 871.201-2.

2. The VA case manager supervising the veteran's or other eligible person's program completes sections A and B of VA form 28-1905 to identify the program participant and to communicate the scope of the planned program to facilities providing the education, training, or other rehabilitation services. The form:

- Affirms that the facility's charges will accord with an existing contract or agreement
- Serves as the only contractual document to authorize services for a particular period to facilities without a formal contract or agreement
- Notifies the facility of the approved program of study for the participant
- Notifies the facility that the participant is authorized to attend at VA expense
- Reminds all service providers of their reporting obligations

Under the terms on the form, the facility is entitled to submit vouchers for program participants to VA for payment of tuition, fees, books, and supplies.

A facility official then completes section C and returns the form to VA to certify that the participant actually began the planned program of courses. Once VA receives the information, the case manager uses it to establish the correct beginning and ending dates and the correct rates for subsistence allowance payments under 38 U.S.C. 3108 and 38 CFR 21.320-322 and 21.332.

3. The use of the paper form allows VA to authorize services to a facility but the use of information technology may enhance the process. After receiving VA Form 28-1905 for authorization, most facilities use VA Online Certification of Enrollment (VA-ONCE) to certify the participant's enrollment. VA-ONCE allows training facilities to electronically certify attendance including number and type of hours, beginning and ending dates, and changes in enrollment.

4. There is no known Department or Agency that maintains the necessary information; neither is it available from other sources within VA. The form allows VA to authorize services to facilities without a formal contract or agreement, and only information required to certify enrollment for a particular period is requested.
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. If VA did not collect this information or collected it less frequently, the potential for abuse of the Chapter 31 and Chapter 35 programs by participants would increase greatly because participants could be paid benefits for prolonged periods of nonattendance.
7. The collection of this information is consistent with 5 CFR 1320.6.
8. The Department notice was published in the Federal Register on October 2, 2014, Volume 79, No. 191, page 59559. One comment was received from this notice on November 29, 2014 with the Docket Number: VA-2014-VACO-0001. The comment received was “Good Idea” and the name of the author is Anonymous Anonymous. There was no response to this comment as an address to respond was not provided.
9. Neither payments nor gifts are made to respondents under this information collection.
10. The veteran or other eligible person is assured of confidentiality (38 U.S.C. 5701). VA may not use the information collected for any other purposes than to provide the case manager with sufficient information to justify the payment of program benefits. The information collected may not be released outside VA without the claimant’s written consent or unless the release is needed for purposes expressly specified by law, including the routine uses of information found in *Compensation, Pension, Education and Vocational Rehabilitation and Employment Records –VA (58VA21/22/28)*, which are contained in 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 Respondents: 90,000
 - b. Frequency of Response: 1 (Once)
 - c. Annual Burden Hours: 7,500
 - d. Estimated Completion Time: 5 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 an estimated \$180,000. (7,500 burden hours X \$24 per hour).
13. The form imposes no recordkeeping burden on respondents. Facilities will complete and submit 90,000 forms in any year.

14. Estimated Annual Cost to the Federal Government

a. Cost for review (90,000 forms X 5 minutes X \$38.65 hourly rate for average GS 13/2 case manager)	\$ 289,875
b. Printing cost	\$ 1,800
c. Total Cost	\$ 291,675

15. There is no change in burden. The expiration date is being added to the form.

16. VA neither tabulates nor makes the information collected available for publication.

17. We are not seeking approval to omit the expiration date for OMB approval.

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

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.