

**SUPPORTING STATEMENT FOR VA FORM 28-1905h
(2900-0034)**

A. Justification

1. The Department of Veterans Affairs (VA) Form 28-1905h, Trainee Request for Leave-Chapter 31 is used to request leaves of absence from the Vocational Rehabilitation and Employment (VR&E) Program, as governed by Title 38 of the United States Code(U.S.C.).. VA must collect this information to ensure program participants are not abusing leaves of absence. The authority to collect the information necessary to manage the leave of absence accounting system is in 38 U.S.C. 501(a) and 3110.
2. VA Form 28-1905h serves as the only document for requesting leave and for providing the information necessary to determine whether to approve the leave request. A trainer or authorized school official must verify on the form the effect the absence will have on the veteran's progress in the program. The case manager (normally a Vocational Rehabilitation Counselor) supervising the veteran's training program approves or denies the leave request. Upon approval, the veteran can receive subsistence allowance and other program services during the leave period as if he or she were continuing to attend training under Title 38 of the Code of Federal Regulations (CFR) 21.270. Disapproval of the request may result in loss of subsistence allowance for the leave period. Failure to collect the information would create the potential for substantial abuse through receipt of benefits for unauthorized absences.
3. This form is available on the Internet in a fillable format. VA cannot use information technology to reduce this collection of information because VA must collect the information directly from each facility and rehabilitation program participant. The present method of collecting the needed information is the most efficient and causes the least burden to the public.
4. There is no other information collection or available system of records that could provide this information to timely serve the applicants. The collected information contains a claim for a specific, time-constrained benefit and is related to other data base holdings.
5. The collection of this information does not have a significant economic impact on a substantial number of small business or other small entities.
6. If VA did not collect this information or collected it less frequently, there is a potential for abuse of the leave accounting system and erroneous payments of subsistence allowance.
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, pages 59563-59564. No comments were received in response to this notice.
9. No gift is made to respondents.
10. Confidentiality of responses is assured under *Compensation, Pension, Education and Rehabilitation Records-VA (58VA21/22/28)* in the Privacy Act Issuances 1999 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	30,000
b. Frequency of response	1 (On occasion)
c. Burden hours	7,500
d. Estimated Completion Time	15 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 respondent and estimated \$180,000. (7,500 burden hours X \$24 per hour).
13. The form imposes no record keeping burden on respondents.
14. Estimated cost to the Federal Government:

a. Cost of review (By GS 12/3 at \$38.65/60 minutes X 5 minutes/ X 30,000 forms	\$96,625
b. Printing, development, and and procurement cost	\$1000
c. Total Cost	\$96,625
15. There is no change from previously reported burden hours. The expiration date is being added to the form.
16. The results of this information collection will be neither tabulated nor published.
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.