

**Supporting Statement for 2900-0677  
VA Form 28-1903, Contract for  
Training and Employment**

**Justification**

1. The Department of Veterans Affairs (VA) Form 28-1903, Contract For Training and Employment (Chapter 31, Title 38 of the United States Code {U.S.C.}) is necessary to facilitate the development of local relationships between the Vocational Rehabilitation and Employment (VR&E) Divisions at the Regional Offices and local vendors/facilities that provide services to veterans under 38 U.S.C. Chapter 31. This form standardizes these local agreements and ensures that they are consistent with Federal Procurement Regulations. VA needs this information collection in order to authorize training/rehabilitation services through these vendors/facilities.
2. Both VA staff from the VR&E Division and an official from the vendor/facility providing training/rehabilitation services complete the VA Form 28-1903. Two witnesses must also sign the form. This form needs to be used in order to facilitate formal agreements with local vendors/facilities that can provide services to veterans.
3. VA cannot use information technology to reduce this collection of information because VA must collect the information directly from each vendor/facility containing original signatures of those providing services to veterans. The present method of collecting the needed information is the most efficient and causes the least burden to the public.
4. This contract is only used for training vendors/facilities that have not been previously approved to provide these services to veterans. This information is not available from any other source.
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. This oversight ensures compliance with the Federal Procurement Regulations. The information collection is collected with each new training vendor/facility and cannot be collected less frequently.
7. The collection of this information is consistent with Title 5 of the Code of Federal Regulations (CFR) 1320.6 guidelines.
8. The Department notice was published on October 3, 2014, Volume 79, No. 192, page 59894. There were no comments in response to this notice.
9. Gifts are not made to respondents under this information collection. However, payment for services is made as provided by the agreement.

10. The veteran or other eligible person is assured of confidentiality (38 U.S.C. 5701). VA may not use the collected information for any other purposes than to provide VR&E staff members with sufficient information to authorize a veteran's participation in a program with a training vendor/facility. VA cannot release the information the form collects outside VA without the claimant's written consent or unless the release is necessary for purposes that the law expressly allows, including the routine uses of information in *Compensation, Pension, Education and Rehabilitation Records-VA (58VA21/28)*, in the 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 estimated respondents: 1200
- b. Frequency of response: 1
- c. Burden hours: 1200
- d. It is estimated that it will take 60 minutes to review and complete this form
- 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 \$28,800. (1200 burden hours x \$24 per hour).

13. The form imposes recordkeeping burden on respondents. Vendor/facilities must adhere to the parameters contained in the agreement. However, the agreement should be completed and submitted one time.

14. Estimated Annual Cost to the Federal Government

- a. Cost for review (1200 forms X 30 minutes X \$38.65 hourly rate for average GS 12/3 case manager) \$ 23,190
- b. Printing cost \$24
- c. Total Cost \$ 23,214

15. There is no change in burden. The expiration date placeholder has been added to the form.

16. VA neither tabulates nor makes the information collected available for publication. This is a new information collection.

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. Collection of Information Employing Statistical Methods**

The collect of information does not employ statistical methods.