

Supporting Statement for VA Form 28-1905M
2900-0061

A. Justification

1. The Department of Veterans Affairs (VA) provides VA Form 28-1905m, Request for Supplies, to facilities offering rehabilitation services to veterans under 38 U.S.C. Chapter 31. This form simplifies these facilities' requests for authorization and certification of the need for supplies for rehabilitation program participants. Under Title 38 of the United States Code (U.S.C.) 501(a), VA has the authority to collect this information. This information collection supports the proper provision of supplies to Chapter 31 participants under 38 U.S.C. 3104(a) (7). VA needs this information collection to ascertain that the veteran needs the requested supplies, that the supplies are reasonable for the veteran's program, and that the veteran does not already own the supplies. Under Title 38 of the Code of Federal Regulations (CFR) 21.212, VA must strictly oversee the provision of supplies to rehabilitation program participants.
2. An official at the facility providing rehabilitation services completes the VA Form 28-1905m. This official certifies that the veteran needs the supplies on the form for his or her program and that the veteran is not requesting them merely because the veteran would like to have them. The veteran then attests on the form that he or she does not already have the supplies in a serviceable condition. Upon receipt of the completed form by VA, the veteran's case manager – who is familiar with the facility – reviews the form and authorizes VA payment for the supplies.
3. 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 working together and then working with the veteran's case manager to authorize the proper supplies. The present method of collecting the needed information is the most efficient and causes the least burden to the public.
4. VA systems of records were researched. No other information collection of available system of records could provide this information to timely serve the rehabilitation program participant. The collected information contains a claim for payment of a specific benefit and is unrelated to other database holdings.
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 prevents abuse of VA payments for program supplies. If this information were not collected, a great potential would exist for abuse of VA payments for program supplies. The information cannot be collected less frequently because the requests for supplies are unique occurrences that need

timely approval to avoid interference with the veteran's progress in his or her rehabilitation program.

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 59556. One comment was received in response to this notice. The comment was from Anonymous saying "Good Idea".
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 collected information for any other purposes than to provide VR&E staff members with sufficient information to determine entitlement to payment for the listed supplies. 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 routing uses of information in *Compensation, Pension, Education and Rehabilitation Records-VA (58VA21/22/28)*, 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 Respondents: 16,000
 - b. Frequency of Response: 1 (On occasion)
 - c. Annual Burden Hours: 16,000
 - d. Estimated Completion Time: 60 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 respondents an estimated \$384,000 (16,000 burden hours X \$24 per hour).
13. The form imposes no recordkeeping burden on respondents. Facilities will complete and submit 1,000 forms in any year.
14. The estimated annual cost to the Federal Government is \$309,200.00. (16,000 forms x 30 minutes x a GS 12/3 case manager hourly rate of \$38.65.)
15. There are no program changes or adjustments. 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

The data collection does not employ statistical methods.