

**SUPPORTING STATEMENT FOR
Claim for Reimbursement of Travel Expenses, VA FORM 20-0968
(OMB Control Number 2900-xxxx)**

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 of the United States Code (U.S.C.), Chapter 31, which provides vocational rehabilitation and employment services to Servicemembers, Veterans, and dependents, as applicable. The Veterans Benefits Administration (VBA) provides mileage reimbursement to qualified Veterans or other claimants (referred to as “claimant” hereafter) who incur expense in traveling to and from Vocational Rehabilitation and Employment (VR&E) offices, or other places, for counseling and evaluation in connection with vocational rehabilitation as established in 38 U.S.C. Section 111. This collection of information is necessary to enable VBA to provide this benefit for authorized travel and appropriately ensure that funds are being paid to the correct claimant. Written information is currently being gathered on an obsolete Department of Veterans Affairs (VA) form (VA 3542) that was never submitted for Office of Management and Budget (OMB) approval. The form is used only for authorized travel on a trip-by-trip basis.

The 30 day Federal Register Notice (FRN) erroneously shows the estimated annual burden as “21,677” and the estimated number of respondents as “130,000.” This was entered in error in ROCIS. The correct estimated annual burden is 10,750 and the correct number of respondents is 129,000.

- 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 purpose of the information collection is for claimants to apply for the mileage reimbursement benefit in an efficient, convenient and accurate manner. VBA must determine the identity of the claimant; the dates and length of the trip being claimed, based on the claimant's residence and the place of evaluation and counseling, or other place in connection with vocational rehabilitation; and whether expenses other than mileage are being claimed. VBA should calculate mileage using Mapquest® as the principal standard for determining approved reimbursement. Other standards (e.g., Rand McNally, Yahoo, Bing) may be used if data is not available at Mapquest.com®. Failure on the part of the individual to complete the form and/or provide mileage does not impact the delivery of travel benefits. The form includes a penalty statement and a statement indicating the claimant has traveled at their own expense and not used Government or cost-free resources for this purpose. The claimant is required to sign the form. Once the information is obtained, it is entered into the Corporate WINRS (CWINRS) case

management system and then the form is sent to the Support Services Division to process payment.

- 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 described any consideration of using information technology to reduce burden.**

VA Form 20-0968 will be available on the One-VA Website in a fillable electronic format. VBA will be hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.

- 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.**

There is no known Department or Agency that maintains the necessary information; neither is it available from other sources within VBA. The form allows claimants to apply for mileage reimbursement for trips unique in time, and only information required to define the unique trip is requested. Some of that information is in VBA systems; however, it is used to identify the claimant and establish eligibility for the benefit requested.

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

Collection of this information does not impact small business or other small 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.**

Less frequent collection of this information is not possible, as it involves application for a specific benefit. Without the information, the mileage reimbursement benefit, which is established in law, could not be dispersed.

- 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 are no special circumstances involved in this information collection that require collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

8. **a. 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.**
- b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.**

The Department notice was published in the Federal Register on October 6, 2014, Volume 79, No. 193, pages 60234 and 60235. There were zero comments received in response to this notice.

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

Mileage reimbursement is established in 38 U.S.C. Section 111. The information gathered by use of the form allows for dispersal of the mileage benefit, for which the reimbursement rate is currently \$.415 per mile traveled or actual cost of travel when using public transportation.

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.**

Claimants are assured of confidentiality of their responses under Compensation, Pension, Education and Rehabilitation Records—VA (58VA21/22), contained in the Privacy Act Issuances, 1993 Compilation.

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.

This form does not collect sensitive information.

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

Estimate Information Collection Burden:

- a. Number of estimated respondents: 129,000¹
- b. Frequency of response Once
- c. Annual Burden Hours 10,750
- 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 \$258,000. (10,750 burden hours X \$24 per hour.)

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

- a. There is no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There are no anticipated capital start-up cost components or requests to provide information.

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.

¹ Calculation based on 110% of the number of Veterans who completed the entitlement decision in Fiscal Year [FY] 2013 [73,700]; 70% of the 20,000 Veterans in Evaluation and Planning status will come in for at least 2 appointments while in status [28,000]; and approximately 35% of the Veterans in Rehabilitation To Employment status will have a need to come in for plan redevelopment [27,300].

Estimated Annualized Cost to the Federal Government

- a. \$585,015 Estimated Support Services Division cost for FY 2014 (129,000 applications X 15 minutes / 60 minutes in an hour X \$18.14 [average GS 5/4 hour wage rate of Support Services Division clerk in field station])
- b. \$428,495 Estimated Vocational Rehabilitation and Counseling Division cost for FY 2014 (129,000 applications X 5 Minutes / 60 minutes in an hour X \$39.86 [average GS 12/4 hourly wage rate of a Vocational Rehabilitation Counselor in field station])
- c. \$2,580 Estimated printing cost
- d. \$1,016,090 Total estimated cost to Federal Government

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

This is not a new information collection. VBA has not established a specific request form, but has been using VA Form 3542, Authorization to Report-Voucher for Mileage Allowance, dated March 1992; however, VBA recently established that this form is not OMB approved. VBA seeks to resolve this issue by obtaining OMB approval for implementation of the Claim for Reimbursement of Travel Expenses, VA form 20-0968, which will collect the same information. The expiration date placeholder has been added to the form.

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.

VBA does not tabulate, nor does it intend to publish this information collection.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

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 certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.