

**Supporting Statement for VA Form 28-8832
Educational/Vocational Counseling Application
(2900-0265)**

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

VA Form 28-8832, Application for Counseling, collects information that the Vocational Rehabilitation and Employment (VR&E) Division needs to quickly assess the applicant's probable entitlement to counseling, to call up further records if necessary, and to contact the applicant to schedule a counseling appointment. Under 38 United States Code (U.S.C.) 501(a), the Secretary shall obtain information sufficient to establish the right to benefits.

- 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.**

A veteran or dependent should use this form to apply for counseling services. VA uses the information collected on the form to verify the applicant's eligibility for educational and vocational counseling delivered under 38 U.S.C. 3697A. Without the form, the application could be delayed, particularly in instances where incomplete data is submitted.

The recent addition of an electronic version of VA Form 28-8832 in the eBenefits web portal, will allow Veterans and Servicemembers to apply online.

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

The hard copy of VA Form 28-8832 requests that the respondent complete the application and send to the nearest VA office. VA will continue to accept hard copy applications from dependents and individuals who are unable to utilize technology to apply.

This form is available on the One-VA Website in a fillable electronic format that can be saved to the applicant's computer and updated if necessary. VBA is

currently hosting this form on a secure server. Validation edits are performed to assure data integrity.

VA has implemented an electronic version allowing veterans to apply over the Internet using VA's eBenefits web portal. Veterans and Servicemembers can create an eBenefits account using their credentials by selecting Register, or can use their established log-in information. The elements in this electronic application are the same as on the printed form; however, because the eBenefits portal provides secure log-on and identity verification, the Servicemember's/Veteran's application is pre-populated with the information necessary to complete the form. Veterans and Servicemembers applying online have the opportunity to review the pre-populated responses, and then click "apply" to submit the application electronically.

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.

Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department. The collected information contains a claim for a specific benefit and is unrelated to other data base holdings.

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

The collection of this information does not impact small businesses or 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.

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. 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.**

The Department notice was published in the Federal Register on January 16, 2015, Volume 80, No. 11, pages 2482-2483. No comments were 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.**

Neither payments nor gifts are made to applicants under this collection of information.

- 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.**

The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22/28, "Compensation, Pension, Education and Rehabilitation Records – VA" as set forth in Privacy Act Issuances, 2001 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.**

There are no questions of a sensitive nature.

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

Estimate of Information Collection Burden.

- a. Number of respondents: 5,100
(4,590 for printed forms plus 510 for online system forms).
- b. Frequency of response: One time
- c. Total Annual Burden Hours: 2,304
Annual Burden Hours (printed form): 2,295 Burden Hours
Annual Burden Hours (online form): 9 Burden Hours
- d. Estimated Completion Time (printed form): 30 Minutes (The completion time is based on long field experience observing applicants completing the form.)
Estimated Completion Time (online form): 1 Minute (The completion time is based on testing and demonstrations of the new functionality)
- e. According to the U.S. Bureau of Labor Statistics, Average Hourly Earnings, the cost to the respondent is \$25, making the cost to the respondents \$57,375 for printed submissions (2,295 burden hours X \$25.00 per hour). The total cost to respondents is \$225 for online submissions (9 Burden Hours X \$25.00 per hour). The total cost to respondents is \$57,600.

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).

This information collection imposes no recordkeeping burden on the public.

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.

Estimated Cost to the Federal Government

- a. \$ 9,456 estimated Vocational Rehabilitation and Employment Division cost for FY 2012 (5,100 applications X 5 minutes/60 minutes in an hour X \$22.25 (average GS 7/4 hourly wage rate)
- b. \$ 175.00 estimated printing cost.
- c. \$ 9,631 total cost to Federal Government.

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

There is no change in the reporting burden hours. The expiration date is being 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.

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

17. If seeking approval to not display 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 certification statement.

B. Collection of Information Employing Statistical Methods

No statistical methods are employed in collection of information.