

Supporting Statement For  
VA Form 28-1902w, Rehabilitation Needs Inventory  
(2900-0092)

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 28-1902w is used by VA Vocational Rehabilitation Counselors (VRC) as a guide to the initial evaluation process. It also has limited use for counseling under other VA education benefit programs. The general authority to collect information to accomplish eligibility review and counseling is contained in 38 U.S.C. 501(a). The information is necessary to accomplish the mandate in 38 U.S.C. 3104(a) to provide educational, vocational, psychological, employment, and personal adjustment counseling that are part of the chapter 31 program.

- 2. Indicate how, and 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 Rehabilitation Needs Inventory is to be mailed to the service-connected disabled veteran after the VA receives an application for vocational rehabilitation benefits. A cover letter provides contact information for an individual Vocational Rehabilitation Counselor who is assigned to case manager the Veteran's program and can provide assistance in completing the form. In the past, the information that would be gathered by using VA Form 28-1902 (which has been discontinued) was collected during multiple appointments with a counselor who followed an interview guide. Use of the VA Form 28-1902w will eliminate the need for multiple meetings with a VA counselor who can use the form to collect the information before or during the first interview. The Rehabilitation Needs Inventory takes approximately 45 minutes to complete.

- 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 VA Form 28-1902w cannot be completed electronically although it is available on the official VA website. VA Form 28-1902w is included in the initial packet sent to the Veteran prior to the Veteran's receipt of services and the Veteran is required to complete and return VA Form 28-1902w to the regional VR&E office at the time of the Veteran's first appointment. The packet including VA Form 28-1902w, provides information regarding the Veteran's initial appointment and information required for determination of the Veteran's eligibility and entitlement for Vocational Rehabilitation Services.

- 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.**

The information is not contained in any other VA records. The form requests personal information about a beneficiary's circumstances that will guide in the selection of the most appropriate training or other program objective.

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

The information collection does not involve small businesses 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.**

Veterans and other beneficiaries enter the information on the form to assist in an individualized counseling session or series of sessions. The information is unique to each client and must be collected for the first session or the counselor would not have enough information to properly evaluate and then to guide the client in selecting a program. The information is collected only once.

- 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.

- 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 December 19, 2014, Volume 79, No. 244 pages 75862 and 75863. 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.**

VA does not provide payment or gifts to respondents.

**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.**

Information will be kept private to the extent permitted by law.

**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.**

Information collected in this form will be used for the applicant's initial evaluation for Chapter 31 benefits and for vocational counseling and rehabilitation planning. The sensitive information is required because this information is necessary for VA to determine entitlement to a program of vocational rehabilitation services under Chapter 31. Applicant is informed of the purpose for use of sensitive information being collected during the initial evaluation process, is provided with privacy act notice, and signs appropriate release of information.

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

Estimate of Annual Information Collection Burden.

- a. Number of Estimated Respondents: 60,000
- b. Frequency of Response: Once
- c. Estimated Annual Burden: 45,000 hours
- d. Estimated Completion Time: 45 minutes
- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00, making the total cost to respondents an estimated \$1,080,000. (45,000 burden hours x \$24.00 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).**

This submission does not involve any recordkeeping costs.

**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 Costs to the Federal Government

a. Processing/Analyzing Costs:

Annual burden hours (45,000) x 38.27/hour (by a Counselor with a grade level of GS-12/3) = \$1,722,150.00

b. Form is available on VA Inter/Intranet websites

c. Printing and production cost: \$26,000.00

d. Total Estimated Cost to Federal Government: \$1,748,150.00

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

There is no change in burden hours. We are renewing the current information collection with no changes.

**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 not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The collection instrument, VA form 28-1902w is the sole source for the collection of information vital to a counselor giving full consideration the veteran's vocational rehabilitation needs. The expiration date will be included on the form.

**18. Explain each exception to the certification statement identified in Item 19, "Certification of 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**

This collection of information does not employ statistical methods.