

Supporting Statement for VA Form 28-1905c (2900-0176)
Monthly Record Of Training And Wages
OMB 2900-0176
VA Form 28-1905c

A. Justification

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

For many chapter 31 rehabilitation program participants, the Department of Veterans Affairs (VA) must establish the type of instruction and which facility will provide it. The participant's program and attendance must be verified. VA Form 28-1905c, Monthly Record of Training and Wages, is provided to on-the-job training establishments and to trainers in certain special programs to maintain records of training progress. These types of on-the-job training programs most often do not have the approval of either the Department of Labor or a joint apprenticeship council. Also, these facilities do not usually have an extensive history of providing on-the-job training. However, VA does approve all training programs for chapter 31 participants. These facilities may also use this form to keep training records for participants training under 38 United States Code chapter 35. The authority to collect this information is in 38 United States Code 3104, 3111 and 3677. A new requirement was issued that a non-substantive ICR be submitted after the 30-day FRN, dated 2/19/16, was published.

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.

On-the-job trainers use this form to maintain accurate records on participant's progress. Trainers in special programs also use this form. These special programs include training in the home and other individual instruction programs. These facilities often do not have an organized system of records sufficient for proper VA monitoring of a participants' progress. This information would otherwise be collected through personal interview, which would be more time consuming.

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.

VA Form 28-1905c is available on the VA Forms Website at <http://www4.va.gov/vaforms> in a fillable/printable format. The elements in this electronic application are the same as on the printed form. However, because this

form requires both the signature of the trainer and the participant, it cannot be sent into the case manager electronically until a secure form of signature can be utilized with the VA.

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 that maintains the necessary information, nor is it available from other sources within our Department. This form collects information that is vital for a veteran's progress toward their rehabilitation goals and for recording their monthly wages. Trainers submit the completed form on regular intervals to VA for review by the veteran's case manager. The review by the case manager ensures that the training provided corresponds to the veteran's individualized rehabilitation plan and that the veteran is making adequate progress in obtaining the skills needed as part of their vocational goal.

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

The collection of information does not involve 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 documentation for each participant in a specialized type of training.

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 is no special circumstance requiring 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 October 21, 2015, Volume 80, No. 203, pages 63877. No comments were received.

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

No payments or gifts to respondents have been made 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, "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: estimated at 4,800 per year
- b. Frequency of Response: estimated at three times for most participants (14,400)
- c. Annual Burden Hours: estimated at 3,600 hours
- d. Estimated Completion Time: the estimated 15 minutes for completion time is based on long field experience observing trainers completing the form.
- e. The respondent population is composed of Veterans enrolled in the Chapter 31 program. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational

background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics gathers information on full-time wage and salary workers. Accordingly, the median weekly earnings of full-time wage and salary workers is \$809.00. Assuming a forty (40) hour work week, the median hourly wage is \$20.23.

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$72,828.00 (based on 3,600 burden hours X \$20.23 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: \$ 49,008.00 estimated Vocational Rehabilitation and Employment Division cost for FY 2016 (4,800 respondents X 15 minutes divided by 60 X \$40.84 (average GS 12/4 hourly wage rate)
- b. Printing and production cost: Forms are available on the VA intranet forms websites: This form is available on both VA Intranet and the Internet and therefore further printing of the paper copies is not needed, thus eliminating any estimated printing cost.
- c. Total cost to the government: \$ 49,008.00 total cost to Federal Government.

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

Not applicable.

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.

The information collection is not for publication or tabulation use.

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

This collection of information does not employ statistical methods.

(If statistical methods are employed, Part B must be completed.)