

SUPPORTING STATEMENT FOR VA FORM 28-1905
OMB Control Number 2900-0014

A. Justification

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

The Department of Veterans Affairs (VA) is required to define the enrollment conditions and to certify pursuit and attendance for any Chapter 31, rehabilitation or Chapter 35, special restorative or specialized vocational training program. The information the facility provides to VA on the VA Form 28-1905, *Authorization and Certification of Entrance or Reentrance into Rehabilitation and Certification of Status*, ensures that individuals do not receive benefits for periods when they did not actually participate in the planned program. Facilities also affirm they will request payment only for properly established charges. The authority to collect this information is in Title 38 of the United States Code (U.S.C.) 501(a) and 3680(g), Title 38 of the Code of Federal Regulations (CFR) 21.294, and 48 CFR 871.201-2.

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 VA case manager supervising the veteran's or other eligible person's program completes sections A and B of VA form 28-1905 to identify the program participant and to communicate the scope of the planned program to facilities providing the education, training, or other rehabilitation services. The form:

- Affirms that the facility's charges will accord with an existing contract or agreement
- Serves as the only contractual document to authorize services for a particular period to facilities without a formal contract or agreement
- Notifies the facility of the approved program of study for the participant
- Notifies the facility that the participant is authorized to attend at VA expense
- Reminds all service providers of their reporting obligations

Under the terms on the form, the facility is entitled to submit vouchers for program participants to VA for payment of tuition, fees, books, and supplies.

A facility official then completes section C and returns the form to VA to certify that the participant actually began the planned program of courses. Once VA receives the information, the case manager uses it to establish the correct beginning and ending dates and the correct rates for subsistence allowance payments under 38 U.S.C. 3108 and 38 CFR 21.320-322 and 21.332.

- 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 use of the online form allows VA to authorize services to a facility. After receiving VA Form 28-1905 for authorization, most facilities use VA Online Certification of Enrollment (VA-ONCE) to certify the participant's enrollment. VA-ONCE allows training facilities to electronically certify attendance including number and type of hours, beginning and ending dates, and changes in enrollment.

- 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 VA. The form allows VA to authorize services to facilities without a formal contract or agreement, and only information required to certify enrollment for a particular period is requested.

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

The collection of this information will not have a significant economic impact on small businesses or other small entities.

- 6. Describe the consequences to Federal programs 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.**

If VA did not collect this information or collected it less frequently, the potential for abuse of the Chapter 31 and Chapter 35 programs by participants would increase greatly because participants could be paid benefits for prolonged periods of non-attendance.

- 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.**

The collection of this information is consistent with 5CFR 1320.6.

- 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 February 13, 2019, Volume 84, No. 30, page 3854. 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.**

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 “Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA (58VA21/22/28,” published at 74 FR 29275 on June 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).

- 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 Annual Information Collection Burden

- a. Total Number of Respondents is estimated at: 90,000
- b. Frequency of Response: Once
- c. Total Annual Burden Hours: 7,500
- d. Estimated Completion Time: 5 Minutes
- e. The respondent population for VA Form 28-1905 is composed of individuals who are enrolled in any Chapter 31 or Chapter 35, special restorative or specialized vocational training programs. VA 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 (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers is \$973.60. Assuming a forty (40) hour work week, the mean hourly wage is \$24.34 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: (https://www.bls.gov/oes/current/oes_nat.htm, May 2017).

Legally, respondents may not pay a person or business for assistance 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 \$182,550. (7,500 burden hours X \$24.34 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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 Annual Cost to the Federal Government

Grade	Step	Burden Time Employee	Hourly Rate	Cost Per Response	Total Responses	Total
13	02	5 min	\$38.65	\$7.73	90,000	\$695,700
Overhead at 100% Salary Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						\$695,700
Processing / Analyzing Costs						\$695,700

Total Cost to Government \$695,700

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.

Note: The hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay ([https:// www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf)). This rate does not include any locality adjustment as applicable.

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

There is no change in burden.

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 collection of information, completion of report, publication dates, and other actions.

The information collection is not for publication.

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 83-1.

This submission does not contain any exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.