**SUPPORTING STATEMENT**

**IBM SKILLSBUILD TRAINING PROGRAM APPLICATION**

**VA FORM 22-10282**

**OMB #2900-NEW**

**Emergency Submission Request**

**A. Justification**

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

Based upon a recent White House Cyber Initiative, as supported by VA Principal Deputy Under Secretary for VA Benefits, Mr. Michael Frueh, VA continues to seek ways to improve education and benefit programs for Veterans and their beneficiaries. In collaboration with IBM, the Department of Veterans Affairs will administer a new educational training program entitled “IBM Skillsbuild.” The IBM SkillsBuild Pilot Training Program is an IBM-sponsored training program to provide free online training in a variety of Information Technology (IT) areas. This free online learning platform will provide adult learners access to IT skills training and create career pathways to fill “in-demand” technology jobs.

IBM SkillsBuild will offer access to courses ranging from, Collaboration and Presentation, Data Analytics, Cybersecurity, Artificial Intelligence (AI), and Cloud Computing. These free course offerings help create pathways for career success for our Nation’s Veterans. IBM will provide diagnostics, online coursework, resume-building credentials, and 1:1 mentoring to military members, Veterans, and dependents. These participants can earn IBM-branded digital credentials to certify their relevant skills in emerging technologies and related proficiencies to prepare them for successful careers in technology. This pilot program has already been successfully deployed to neurodivergent learners worldwide and university students from underrepresented communities in the United States. VA is excited to also have an opportunity to expand this no-cost Science, Technology, Engineering, and Mathematics (STEM) job training to Veterans.

These collaborations underscore IBM’s focus on providing STEM jobs training to traditionally underrepresented communities as part of its commitment to skill 30 million people worldwide by 2030 and to create equitable, inclusive economic opportunities while addressing a longstanding technology skill shortage.

VA feels this program is a unique and urgent need that would provide many pathways to employment and career success for our Veterans and their dependents. This partnership with IBM will offer our beneficiaries a unique opportunity to obtain the skills and find job opportunities across companies and industries. Participants will be provided the tools and resources to complete training within four months of starting the program, with a minimum commitment of 8-10 training hours per week. Employment assistance will be provided through IBM upon successful completion.

IBM Skillsbuild will be an enhanced resource for transitioning Service members and Veterans seeking job training and credentials through the VA to pursue a career after military service. In collaboration with the VA’s Veteran Employment Through Technology Education Courses (VET-TEC) Employer Consortium, IBM will help military Veterans and their beneficiaries pursue customized learning paths and work roles for high-demand technology careers. Free access to Industry-leading tech content, badges, and certifications as follows:

* Fortinet and Red Hat Certification courses; certification prep and free exam vouchers
* IBM digital badges provide credentials critical to employers. Badges include Working in a Digital World, Agile Explorer, Mindfulness, Job Application Essentials, Cybersecurity Fundamentals, Introduction to Data Analysis, IBM Z System Administrator, Customer Service, Web Development, and being an Entrepreneur
* 6 weeks of a “train the trainer model” from IBM on how to use the platform to drive technology adoption and implementation within a company’s organization
* Ongoing technical support and platform updates from IBM
* Access to granular reporting on learner progress and badges earned with the ability to customize learning paths most relevant to learners
* Access to IBM mentors to guide learners’ career trajectory
* Partnership and co-creation of project-based learning opportunities and work fairs for learners

Therefore, we would like to develop an intake form to allow our beneficiaries to register and apply for the program. The applicant must be a Veteran, Service member, or dependent. Registration for this training opportunity will be on a first-come, first-served basis to begin at least ten (10) days before the first cohort begins pending MOU/MOA agreement being signed. Currently, the intake VA Form 22-10282 will be submitted to VA via Email, until VA has sufficient time to allow the receipt of the application electronically.

The use of normal clearance procedures, which will take at least 90 days, would hinder the mission of this program which is to upskill/reskill Veterans quickly and prepare them to fill the “in-demand” tech roles.

**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 IBM SkillsBuild Program is an IBM-sponsored training program administered by VA to provide free virtual Information Technology (IT) training.  SkillsBuild is a free online learning platform that provides adult learners with the opportunity to gain or improve IT skills that meet the needs of employers in the High-Technology industry.  VA will provide the opportunity for Veterans, Service members, and their families to access free, self-paced, virtual training and credentials in Cybersecurity and Data Analytics.  This virtual training in the field of Cybersecurity and Data Analytics is an enhanced resource for Veterans and transitioning Service members who are seeking job training and credentials to pursue a career in Technology.

The IBM Skillsbuild Training Program Intake Form, VA Form 22-10282 will allow eligible candidates to apply and register on a first-come, first-served basis to participate in the program and the form will be received electronically via Email to be submitted to Vettecpartners@va.gov., for processing.

**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.**

At this time, other information technology other than Email cannot be used to reduce the burden. The eligible participant will submit the form electronically to our VA partners for processing via Email to Vettecpartners@va.gov.

**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.**

A review was conducted to identify any potential areas of duplication and none were discovered. There is no known Department or Agency that maintains this information, nor is it available from other sources within the VA.

**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.**

If the information is not collected, VA will not be able to choose the qualified applicant to apply and participate in the IMB Skillsbuild program on a first-come, first-served basis.

**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.**

This is an emergency request. VA will promptly begin the public notice and comment process for a regular clearance as soon as the emergency request is approved.

**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 VA Form 22-10282 is retained permanently in a folder created specifically for the eligible candidates and will be processed by VA partners for processing at Vettecpartners@va.gov. Assurance of confidentiality is covered by 38 U.S.C. 5701 and the VA System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), which are contained in the Privacy Act Issuances, 2012 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.

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

Estimate of Information Collection Burden.

1. Number of Respondents: 600 (100 per cohort - 6 cohorts provided)
2. Frequency of Response: Occasionally
3. Annual Burden Hours: 100 (600 X 10min / 60min)
4. Estimated Completion Time: 10 minutes

e. The respondent population for VA Form 22-10282 is composed of Veterans, Service members, or dependents that registers and applies to participate for this training opportunity one a first-come, first served basis. The eligible individual must have previous or current entitlement under the GI Bill program. VA cannot make any 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 are $1,120.40. Assuming a forty (40) hour work week, the **mean hourly wage is $28.01 based on the BLS wage code – “00-0000 All Occupations.” ($28.01 X 40 hours). This** information was taken from the following website: [https://www.bls.gov/oes/current/oes\_nat.htm](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.bls.gov%2Foes%2Fcurrent%2Foes_nat.htm&data=04|01||d46824eeafc7432f7bea08da18bb8110|e95f1b23abaf45ee821db7ab251ab3bf|0|0|637849490835731295|Unknown|TWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D|3000&sdata=179jxC04%2BzLtvZTyzpieSoZtbQyZwRb4aBPsl1d1DmU%3D&reserved=0) May 2021.

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.

**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 Costs to the Federal Government: $4,653.00**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Grade | Step | Burden Time | Hourly Rate |  Cost Per Response  | Total Responses | Total |
| 09 | 05 | 15 min  | $31.02 |  $7.75 | 600 | $4,653.00 |
| -- | -- | -- | -- | -- | -- | -- |
| 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.** |   |
| Processing / Analyzing Costs  | $4,653.00 |
| Printing and Production Cost | $0 |
| Total Cost to Government | $4,653.00 |

**Note:** The hourly wage information above is based on the hourly 2023 General Schedule (Base) Pay. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS\_h.pdf](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.opm.gov%2Fpolicy-data-oversight%2Fpay-leave%2Fsalaries-wages%2Fsalary-tables%2Fpdf%2F2023%2FRUS_h.pdf&data=05%7C01%7C%7C40670302acdd47b60d1308dafa57121e%7Ce95f1b23abaf45ee821db7ab251ab3bf%7C0%7C0%7C638097549115309975%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Bgb9TJmghAVmW5xpd26xwcsWlTIX%2FFpLNXOTSn7WubQ%3D&reserved=0).

The processing time estimates above are based on the actual amount of time employees of the grade level spend to process to completion, a claim received on this form.

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

There is no burden changes since this is a new information collection and new emergency submission.

**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 publish this information or make it available for publication.

**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 information collection fully complies with all the requirements of 5 CFR 1320.8(b)(3).

**B. Collection of Information Employing Statistical Methods**

This collection of information by the Veterans Benefits Administration does not employ statistical methods.