

SUPPORTING STATEMENT - PART A

Decision Review Request: Information for Veteran Readiness and Employment Entitlement Determination – OMB #2900-0092

Summary of Changes from Previously Approved Collection

- Changed the title to the form.
- Changed the instructions to incorporate the updated VA contact web address.
- Changed wording throughout the form to plain language.
- Changed the respondent from Veteran or Service member completing the form to Vocational Rehabilitation Counselor who will ask the Veteran or Service member the questions of this collection during the initial evaluation.
- Changed to updated New Burden Statement Language.
- The ICR is being submitted as a revision of a currently approved collection due to a decrease in burden.
- Received and responded to one public comment received during the 60-Day Comment Period.

1. **Need for the Information Collection**

The Department of Veterans Affairs (VA) through its Veterans Benefits Administration (VBA) administers an integrated program of benefits and services, established by law, for Veterans, service personnel, and their dependents and/or beneficiaries. Under the authority of Title 38 United States Code (U.S.C.) §501(a) provides VA the authority to collect this information. Information requested by VA Form 28-1902w, Information for Veteran Readiness and Employment Entitlement Determination is used by the VA Vocational Rehabilitation Counselor (VRC) during the comprehensive initial evaluation to assist with gathering information for an Entitlement Determination. The information collected is necessary to accomplish the mandate in 38 U.S.C. 3104(a) to provide an evaluation of the potential for rehabilitation of a Veteran or Service member, including diagnostic and related services, to determine whether the Veteran or Service member has an employment handicap or a serious employment handicap and whether a vocational goal is reasonably feasible for such Veteran or Service member.

2. **Use of the Information**

The VA Form 28-1902w, Information for Veteran Readiness and Employment Entitlement Determination is used by the VRC with the Veteran or Service member during the comprehensive initial evaluation after the VA receives an

application for Veteran Readiness and Employment benefits and has determined the Veteran or Service member is eligible to apply for Chapter 31 under Title 38 U.S.C. 3104(a) and 38 CFR § 21.50. Use of the VA Form 28-1902w will allow the VA counselor to use the form to collect the information during the initial evaluation. Information for Veteran Readiness and Employment Entitlement Determination takes approximately 45 minutes to complete.

3. **Use of Information Technology**

VA Form 28-1902w is available on the One-VA internet website in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete electronic submission of the form. Validation edits are performed to assure data integrity. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database. The VRC reads the questions to the Veteran or Service member and completes the form with the responses the Veteran or Service member provides.

4. **Non-duplication**

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. The form requests personal information about the Veteran's or Service member's circumstances that will guide in the entitlement determination.

5. **Burden on Small Businesses**

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. **Less Frequent Collection**

VRC completes the information on the form with the Veteran or Service member. The information is unique to each Veteran or Service member and must be collected to assist in making an entitlement determination during the initial evaluation or the counselor would not have enough information to properly evaluate the Veteran's or Service member's circumstances. The information is collected only once.

7. **Paperwork Reduction Act Guidelines**

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR §1320.5(d)(2).

8. **Consultation and Public Comments**

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, July 02, 2024. The 60-Day FRN citation is 89 FRN 54962.

One comment was received during the 60-Day Comment Period. They are included below in the order they were received, as well as our Agency's response to the comment.

Comment:

VA Form 28-1902w, Section 19, page 3, lists the Army, Navy, Marines, Coast Guard, Air Force, and Space Force, but omits the USPHS and NOAA. This is a blatant oversight. USPHS and NOAA veterans are equally entitled to these services, and to omit their branches sends a message that they are not eligible to apply. Please add these two services (there is room is the top line to easily do so). Thank you.

VBA Response:

Thank you for your comment. VA Form 28-1902w, Information for Veteran Readiness and Employment Entitlement Determination, is to be completed by a Vocational Rehabilitation Counselor in the Veteran Readiness and Employment, Chapter 31 program during the initial evaluation. VA Form 28-1902w, Information for Veteran Readiness and Employment Entitlement Determination is not an application for Chapter 31, Veteran Readiness and Employment benefits.

In accordance with 38 U.S.C. 3102 and 3103, Veterans who have a service-connected disability at 10 percent or more may apply for Chapter 31, Veteran Readiness and Employment using the VA Form 28-1900, Application for Veteran Readiness and Employment Benefits for Claimants with Service-Connected Disabilities.

On the revised VA Form 28-1902w, Information for Veteran Readiness and Employment Entitlement Determination, Sections 18 and 19 on page 4 are blank and the branch(s) of service is a fillable field to allow the Vocational Rehabilitation Counselor to complete the branch of service in which the Veteran served.

A 30-Day Federal Register Notice for the collection published on Tuesday, September 10, 2024. The 30-Day FRN citation is 89 FRN 73509.

9. **Gifts or Payment**

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. **Confidentiality**

The records are maintained in the appropriate Privacy Act System of Records identified as “Compensation, Pension, Education, and Veteran Readiness and Employment Records-VA (58VA21/22/28),” published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022). This statement is located on the bottom of the VAF 28-1902w.

11. **Sensitive Questions**

Information collected on this form will be used during the Veteran’s or Service member’s initial evaluation to assist with making an entitlement determination for Chapter 31 benefits. The sensitive information is required because this information is necessary for VA to determine entitlement to a program of Veteran Readiness and Employment services under Chapter 31. The Veteran or Service member 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. **Respondent Burden and its Labor Costs**

Part A: ESTIMATION OF RESPONDENT BURDEN

- a. Number of Respondents is estimated at 64,129 per year.
- b. Frequency of Response is once.
- c. Annual burden hours are 48,097 hours.
- d. The estimated completion time for each form is 45 minutes.
- e. The respondent population for VAF 28-1902w is composed of Department of Veteran Affairs VRCs and Veterans or Service members. 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 hourly wage is \$31.48 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.

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 \$1,514,094 (48,097 burden hours x \$31.48 per hour).

13. **Respondent Costs Other Than Burden Hour Costs**

This submission does not involve any recordkeeping costs.

14. **Cost to the Federal Government**

Estimated Annual Cost to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	45	0.75	\$ 25.06	18.795	64,129	\$ 1,205,304.56
Overhead at 100% Salary							\$ 1,205,304.56
9	3	45	0.75	\$ 30.65	22.988	64,129	\$ 1,474,165.39
Overhead at 100% Salary							\$ 1,474,165.39
11	3	45	0.75	\$ 37.08	27.810	64,129	\$ 1,783,427.49
Overhead at 100% Salary							\$ 1,783,427.49
12	3	45	0.75	\$ 44.45	33.338	64,129	\$ 2,137,900.54
Overhead at 100% Salary							\$ 2,137,900.54
Processing / Analyzing Costs							\$ 13,201,595.94
Printing and Production Cost							\$ 146,684.40
Total Cost to Government							\$ 13,348,280.34

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

Printing and production costs approximates the cost of printing this information collection per year. (Processing/Analyzing Cost total divided by \$90).

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay ([SALARY TABLE 2024-GS \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salary/)). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

15. **Reasons for Change in Burden**

Due to the Annual Benefit Report the number of respondents has decreased.

16. **Publication of Results**

VA neither tabulates nor makes the information collected available for publication.

17. **Non-Display of OMB Expiration Date**

VA Form 28-1902w, the collection instrument, is the sole source for the collection of information vital to a VRC giving full consideration the Veteran's or Service member's claim for VR&E program benefits. The form is submitted to OMB every three years. The expiration date will be included on the form.

18. **Exceptions to "Certification for Paperwork Reduction Submissions"**

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