

SUPPORTING STATEMENT A

**TITLE 38 HEALTH CARE POSITIONS
TRAINEE APPLICATION and APPRAISAL**

VA Forms 10-2850d and 10-2850e

OMB Control Number 2900-0205

Summary:

- There is a decrease in the total estimated number of responses and burden hours based upon program data since the last PRA clearance.
- This collection includes VA Forms 10-2850d and 10-2850e.
- The forms have been updated with required PRA language.
- VA Forms 10-2850, 10-2850a and 10-2850c have been discontinued and removed from the collection.
- VA did not receive comments on the 60-day FRN.

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 collection of this information is authorized by Title 38 United States Code (U.S.C.) Section 7403, which provides that appointments of Title 38 positions will be made only after qualifications have been satisfactorily verified in accordance with regulations prescribed by the Secretary. Occupations listed in 38 U.S.C. 7401(1) and 7401(3) are appointed at a grade and step rate or an assignment based on careful evaluation of the trainee's education and experience. Title 38 U.S.C. 7302 requires VA to assist in the training of health professionals for the agency's own needs and for those of the nation.

All health position trainee applicants must provide information concerning their background, training, and education, as well as previously held licenses/registrations, to determine if they meet requirements.

VA Form 10-2850d is used to collect appropriate information about qualifications for each trainee participating in accredited educational programs with VA.

VA Form 10-2850e is the pre-employment reference form used to elicit information concerning the prior education and/or performance of the Title 38 applicant. Information provided is used to determine a trainee's eligibility for employment and the appropriate grade and step rate or assignment.

This information collection is only for VA health position trainee applicants. The forms have been updated with required PRA language. VA Forms 10-2850, 10-2850a and 10-2850c have been discontinued and removed from the collection.

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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.

Trainees participating in accredited educational programs must complete 10-2850d. VA sends 10-2850e to the educational institutions, organizations, and individuals indicated by the applicant on the employment application form. The forms are reviewed by field station officials, including Medical Center Directors, Chiefs of Staff, Designated Learning Officers, Human Resources Management Officers or designees. These individuals ensure that trainees meet administrative and regulatory requirements for VA employment or placement. If the information is not collected on these applications forms, then qualifications and requirements could not be assessed.

- a. VA Form 10-2850d, Health Professions Trainee Data Collection Form, will collect information used to support qualifications for a trainee appointment to VHA.
- b. VA Form 10-2850e, Appraisal of Applicant, will collect information used to determine if the applicant meets the requirements for employment.

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 uses the website <http://www.vacareers.com> for applicants to seek information regarding Health Occupation employment opportunities. Interested applicants can log into the system website and either complete the application on-line or download a .pdf version of the form to fill out and mail. Improved information technology will not decrease the burden on the public.

The .pdf versions of these forms are available on <http://vaww.va.gov/forms/medical/searchlist.asp> in a fillable or print and fill mode. To meet the requirements of the Government Paperwork Elimination Act (GPEA) VA is currently conducting cost benefits and risk analysis studies on these forms to determine if more action is warranted.

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.

For VA Forms 10-2850d and 10-2850e there is no other source of trainee data that is accessible to management and human resources officials charged with making employment or placement determinations.

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

Small businesses are involved only in responding to form 10-2850e. Most questions have been phrased so that the respondent simply checks the appropriate answer. Every effort has been made to minimize the burden to small businesses by keeping questions simple and to an absolute minimum.

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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.

Title 38 U.S.C. 7403 provides that appointments of Title 38 individuals will be made only after qualifications and requirements have been satisfactorily established in accordance with regulations prescribed by the Secretary. If the information were not collected, qualifications and requirements of trainee applicants could not be assessed and appointments or placement could not be made to VA Medical Centers. The information must be collected in order to meet screening requirements.

The collection is handled on a one-time basis at each medical center to which a Title 38 trainee candidate applies through a single submission for a position. 10-2850e is used only once for a former supervisor or employer and every education institution listed by the applicant for a position to verify completion of degree requirements. No further reduction is feasible if the agency is to continue employing quality health care professional trainees and providing clinical training for VA and the nation, as required by statute.

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 such special circumstances.

8. a. 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.

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, June 29, 2026. The 60-Day FRN citation is 91 FR 39163. VA did not receive public comments on the 60-day FRN.

A 30-Day Federal Register Notice for the collection published on Thursday, September 10, 2026. The 30-Day FRN citation is 91 FR 57693.

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b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

These forms are routinely reviewed to ensure that all elements essential for hospital accreditation and credential verification are included. This assures the safety requirements of VA patients are adequately addressed. Comments of candidates for VA employment about these application forms are considered on a continuing basis. Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

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

No payment or gift is provided 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.

The Privacy Act Notice on these forms indicates that information is requested under Title 38 U.S.C. Information provided may be released by the Agency under certain circumstances described in the Notice. Records are maintained in the system identified as "Applicants for Employment under Title 38 U.S.C.-VA" (02VA135), in the Compilation of Privacy Act Issuances via online GPO access at <https://www.gpo.gov/privacy>.

11. Provide additional justification for any questions of a sensitive nature, 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:

- a. **Total annual responses** = 171,820
Total annual burden = 85,910 hours

Form	Respondents	Frequency	Annual Responses	Min.	Annual Burden Hours
10-2850d	121,000	1	121,000	30	60,500
10-2850e	50,820	1	50,820	30	25,410
TOTAL			171,820		85,910

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b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13.

See chart in subparagraph 12a above.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

VA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, VHA 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 \$32.66 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. VHA estimates the total cost to all respondents to be \$2,805,820.60 (85,910 burden hours x \$32.66 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).

- a. There are no capital, start-up, operation, or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There is no anticipated recordkeeping burden beyond what is considered usual and customary.

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.

Total Cost to the Federal Government is estimated at **\$8,645,576**:

10-2850d	\$342,300
10-2850e	\$8,303,276
TOTAL	\$8,645,576

Key to Interpreting Cost Data		
COS	Chief of Staff	\$143/hour
SC	Service Chief	\$85/hour

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P/D	Physician/Dentist	\$118/hour
SHS	Senior House Staff - Resident or Intern	\$26/hour
RN	Nurse, Intermediate Grade	\$42/hour
P/VT	Physical/Vocational Therapist, EFDA, Physician's Assistant	\$44/hour
LPN/LVN	Licensed Practical/Vocational Nurse	\$25/hour
HR Spec.	Human Resources Specialist (GS 11/4)	\$34/hour
MD PSB	MD Professional Standards Board - COS and 2 SC	\$303/hour
RN PSB	House Staff Review Committee - COS, 2 SC & 2 SHS	\$365/hour
	Clerical (GS 4/4)	\$17/hour

a. Cost for VA Form 10-2850d is estimated to be **\$342,300**.

Processing: 120,000 applications x 5 min x \$34/hour for Education Specialist \$340,000

Printing/Distribution \$2,300

b. Cost for VA Form 10-2850e is estimated to be **\$8,303,276**.

Processing:	Clerical	=	50,820 x 15 min x \$ 17/hour	=	\$215,985
	HRS	=	50,820 x 30 min x \$ 34/hour	=	\$863,940
	MD PSB	=	15,609 x 15 min x \$303/hour	=	\$1,182,382
	RN PSB	=	62,436 x 15 min x \$126/hour	=	\$1,966,734
	HSRC	=	33,299 x 15 min x \$365/hour	=	\$3,038,534
	LPN/LVN SB	=	14,190 x 15 min x \$109/hour	=	\$386,678
	OSB	=	8,041 x 15 min x \$280/hour	=	\$562,870
Printing/Distribution					\$2,300
Postage	50,820 x \$0.55 outgoing				\$27,951
	50,820 x \$1.10 return				\$55,902
					\$8,303,276

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14.

There is a decrease in the total estimated number of responses and burden hours based upon program data since the last PRA clearance, including the discontinuance and removal of three forms. This collection includes only forms 10-2850d and 10-2850e, which will be used by applicants for health care trainee positions.

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.

There are no plans to publish the results of the information collected.

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17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA does not seek to omit the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

There are no such exceptions.