



Comment of The Scaffold Initiative

To: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Desk Officer for the Department of Veterans Affairs

Copy: Veterans Benefits Administration, Department of Veterans Affairs

Re: VA Form 22-10282, IBM SkillsBuild Training Program Intake Application

OMB Control No. 2900-0922 · ICR Ref. 202606-2900-004 · FR Doc. 2026-19553 (91 FR 60699)

Date: October 23, 2026

I. Interest of the Commenter

The Scaffold Initiative is a Wyoming-incorporated 501(c)(4) social welfare organization focused on workforce equity, the capacity of community-based organizations, and the responsible use of technology in workforce programs. We have commented on Workforce Innovation and Opportunity Act (WIOA) state plans, including those of Wyoming, Oklahoma, and Oregon, and on federal workforce data collections, including the Job Corps Placement and Assistance Record (OMB Control No. 1205-0035) and VA's VET TEC 2.0 employment certification (VA Form 22-10299).

We support this collection. Our work centers on helping people move into the jobs that technology is creating. The IBM SkillsBuild collaboration does exactly that for Veterans, Service members, and their families, at no cost to them. Our comments draw on the draft form and supporting statement posted with the Information Collection Request (ICR) package, and on the program as VA.gov describes it today.

II. What the Program Already Does Well

- **People are using it.** The prior ICR estimated 600 applicants a year. The supporting statement reports an average of 12,029 a year from actual data for 2023 through 2025, about twenty times the original estimate.
- **It has grown with the job market.** VA.gov now lists more than 1,000 courses, including artificial intelligence (AI), cloud computing, and IT support alongside cybersecurity and data analytics.
- **It asks for little.** The application takes about 10 minutes, applicants can complete it online, and it asks for only the last four digits of a Social Security number.

III. Summary of Recommendations

1. **Pair the starting point with an end point.** The form already records employment, salary, and education at intake. One optional consent would let VA learn what participants completed and earned.
2. **Describe the program participants will actually find,** starting with eligibility, where the form and the supporting statement disagree.
3. **Complete the Privacy Act statement,** including the authority, the IBM and SkillUp data flow, and the current system of records notice.

- 4. **Record each credential by name**, and invite IBM to publish SkillsBuild credentials with standard identifiers.
- 5. **Correct the ICR record** so OMB reviews an accurate burden estimate (Appendix).

IV. Recommendations

1. Pair the starting point with an end point

Items 13A through 13D ask whether the applicant works, in which technology field, at what salary range, and with what education. That is a baseline. The package doesn’t yet describe an end point to compare it with. Supporting statement item 2 asks for the “actual use the agency has made of the information.” Item 16 states that the information “is not for publication or tabulation use.” The Government Accountability Office (GAO) saw the same pattern in VA’s original VET TEC pilot, finding that VA did not use the job-type data it collected (GAO-23-105343, October 2022).

The data to close the gap already exists. IBM issues SkillsBuild credentials through Credly, and VA.gov tells applicants that these credentials “are verified proof of your subject matter expertise.” We recommend that VA:

- **Add one optional checkbox** at intake, in plain language. For example: *“IBM SkillsBuild may share with VA which courses I completed and which credentials I earned. VA may contact me once, about a year from now, to ask about my work. Saying no does not affect my participation.”*
- **Receive completion and credential records from IBM** for participants who check the box. This adds no questions for participants. A later follow-up survey sent to ten or more people would be a separate collection that needs its own clearance (44 U.S.C. 3502(3)(A)(i)). The consent simply makes that step possible when VA is ready.
- **Publish a short annual summary** of applicants, completions, and credentials earned, by military affiliation. The WIOA credential attainment indicator (20 CFR 677.155(a)(1)(iv)) offers a ready definition, so SkillsBuild results can sit beside other federal workforce programs.

For Veterans, VA could also confirm later employment through new-hire records, using Routine Use 70 of its education records system, as we suggested for VET TEC 2.0. That path needs a full Social Security number and covers Veterans only. The consent route reaches every participant, including spouses, children, and caregivers.

2. Describe the program participants will actually find

The form, the supporting statement, and VA.gov describe different versions of the program:

Topic	Form 22-10282 says	Supporting statement and VA.gov say
Eligibility	Applicant must have “previous or current entitlement under the GI Bill program”	“An eligible individual does not have to have current or previous entitlement under a GI Bill program” (item 12e). VA.gov lists six groups, with no GI Bill requirement

Topic	Form 22-10282 says	Supporting statement and VA.gov say
Courses	Four choices: cybersecurity or data analytics, basic or advanced, plus “Other”	More than 1,000 courses, including AI, cloud computing, and IT support
Course length	Cohorts last 18 weeks, 7 to 10 hours a week	Four months, 8 to 10 hours a week (item 1); VA.gov lists guided courses of 1 to 8 weeks
How to apply	On the IBM SkillsBuild website	VA.gov only (notice); email to vettecpartner@va.gov (ICR abstract); online or by emailed paper form (VA.gov forms page)

Eligibility matters most. A spouse or caregiver who reads the form’s criterion could decide not to apply, though VA’s own materials say they qualify. We assume the supporting statement and VA.gov reflect current policy, and recommend that VA align the form to them. We also recommend that item 11 list the subject areas VA.gov names, that item 7 (cohort date) apply only to guided courses, and that the form name a single way to apply.

3. Complete the Privacy Act statement

The Privacy Act asks each form to state its authority, principal purposes, routine uses, and the effect of not responding (5 U.S.C. 552a(e)(3)). Four short edits would bring the statement up to date:

- **Authority.** The statement cites 38 U.S.C. 3452(b) and 3501(a), which define terms for the Vietnam-era GI Bill (chapter 34) and Dependents’ Educational Assistance (chapter 35). The ICR lists no authorizing statute. We recommend that VA cite the authority it relies on for this collaboration.
- **Who receives the data.** The routine-use example describes schools and training establishments. VA.gov already tells applicants that SkillUp, IBM’s training delivery vendor, will process their name and email and “will share your data with us.” The form should say the same, along with the evaluation purpose if VA adopts Recommendation 1.
- **Effect of not responding.** The statement says a response “is required to obtain or retain benefits” and also “you do not have to respond.” For a no-cost program, one plain sentence works better: giving this information is voluntary, and VA needs it to approve participation.
- **Names and citations.** The statement calls this the “IBM Skillsbuild Cybersecurity Training Program,” and the program now covers much more. The supporting statement cites the system of records 58VA21/22/28 as last amended in February 2022 (87 FR 8740). VA most recently modified it in September 2025 (90 FR 44464).

4. Record each credential by name

Where a participant consents, VA should record each credential by the name IBM issues it under, with its date. We also invite IBM to publish SkillsBuild credentials to Credential Engine’s registry. Each published credential receives a Credential Transparency Identifier (CTID), which lets VA compare SkillsBuild results with other VA education programs and link each credential to the

occupations it prepares for. We recommended the same identifier for the Job Corps Placement and Assistance Record (Comment of The Scaffold Initiative, FR Doc. 2026-17834, OMB Control No. 1205-0035, submitted September 29, 2026).

5. Correct the ICR record

The ICR lists a respondent cost burden of \$49,559. That figure matches the cost to the Federal Government in supporting statement item 14 (\$49,559.48). Applicants pay nothing to complete a free online form, and the prior ICR listed \$0. The ICR also answers “No” to whether VA received public comments, while the supporting statement reports one. The Appendix lists these and other small edits.

V. Conclusion

Every year, about 12,000 Veterans, Service members, and family members tell VA where they stand when they start this program. With one consent checkbox, a form that matches the program, a complete privacy notice, and named credentials, VA can also learn where they end up. The Scaffold Initiative would be glad to help test the revised form with community partners who serve military families.

Respectfully submitted,

Ricky Tucker
Executive Director
The Scaffold Initiative
c/o Northwest Registered Agent LLC
30 N Gould Street, Suite N
Sheridan, WY 82801
policy@thescaffoldinitiative.org

Appendix: Clean-up Edits

Where	Suggested edit
ICR, Annual Cost Burden	Lists \$49,559, the government’s cost. Respondents have no out-of-pocket cost. Use \$0, as in the prior ICR.
Supporting statement, item 13	Answers “There are no questions of a sensitive nature.” Replace with the respondent cost statement.
ICR, public comments	Answers “No.” The supporting statement and ICR list one comment (September 3, 2026). Answer “Yes.”
ICR, information collection list	Lists the form number as 22-10285. Use 22-10282.
ICR abstract	Says the form is “sent via Email to Vettecpartner@va.gov.” Match the current online process.

Where	Suggested edit
Notice, ADDRESSES	Directs commenters to “OMB Control No. 2900-NEW.” Use 2900-0922.
Form, page 1, “How do I apply?”	The link <code>.../ibm-skillbuild-program/</code> returns “page not found.” Use <code>.../ibm-skillsbuild-program/</code> .
Form, page 1, first heading	Asks “What is the IBM SkillsBuild Pilot Training Program?” The notice drops “pilot.” Use one name.
Form, burden statement	Reads “per respondent, per year,” while the notice lists the frequency as “Once.” Use “per response.”
Form, page 2, instructions	Says the form “must be completed in its entirety,” but some items don’t apply to everyone (home number, cohort date, items 13B and 13C). Mark required items.
Form, item 13B	Lists five technology fields with no “No” or “Other” option. Add both.
Supporting statement	“IMB SkillsBuild” (item 6); “VA Form 2210282” (item 3).

AI Disclosure: This comment was prepared with the assistance of Claude (Anthropic), which was used for research synthesis, drafting, and citation verification. All substantive positions, recommendations, and strategic judgments are those of The Scaffold Initiative. Facts about the collection come from the Federal Register notices (91 FR 37231 and 91 FR 60699), the draft VA Form 22-10282 and supporting statement posted with ICR Reference No. 202606-2900-004 on reginfo.gov, and VA.gov’s IBM SkillsBuild program and form pages as of October 23, 2026.