

SUPPORTING STATEMENT FOR RENEWAL OF 2900-0636

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans and persons on active duty pursuing approved programs of education under chapter 30, title 38, United States Code. Section 3014A, Title 38, United States Code, provides that the Secretary must prescribe regulations including the requirements for the request, certification of receipt, and use of an accelerated payment under this education program.

This is a renewal of this collection. In our previous submission for renewal, we mentioned revising VA Form 22-1999, Enrollment Certification, to include an area to where claimants could request an accelerated payment. On October 27, 2003, OMB approved this revised form (2900-0073). Therefore, this submission does not include the claimant's request for accelerated payment.

The rules for certification and use of the accelerated payment are in § 21.7154(d)(1). VA uses a letter to gather the needed accelerated pay information. This letter is the collection instrument to gather this information and is designated as the Hi Tech Verification of Course Completion letter.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3014A
 - b. 38 Code of Federal Regulations 21.7154(d)(1)
2. VA uses this certification information to implement its regulations regarding the receipt and use of the accelerated payment.
3. Information technology is not being used to reduce the burden. VA considers this information collection as being too small to warrant the cost of developing an electronic collection. The request for accelerated payment is electronically submitted and collected on OMB 2900-0073 and indicated in #1 above.
4. VA is not aware of any duplication of this information collection. The information we are collecting (as indicated in #1 above) is required by statute.
5. Individual chapter 30 claimants are the only source for this information. The information collection does not have any impact on small businesses or other small entities.
6. VA would not be able to administer the certification provision of accelerated payment set by law and regulation.

7. Generally, an individual will not request more than one accelerated payment per quarter. However, some training programs offer short duration high cost courses that last anywhere from a week to several weeks. If an individual enrolls in several short duration courses during a quarter, it is possible he or she will request more than one accelerated payment. In those instances, we would obtain more than one certification per quarter.

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 33340 and 33341 of the Federal Register dated June 8, 2006. We have not received any comments in response to this notice.

9. VA does not provide any payment or gifts to respondents.

10. After processing, the claimant's information is retained in his or her education record. We periodically destroy these records. If a claimant's education record is destroyed, all documents contained in that record are also destroyed. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Rehabilitation Records - VA (58VA21/22), that are contained in the Privacy Act Issuances, 2001 Compilation.

11. No information is considered to be of a sensitive nature.

12. The total estimated annual burden for this information collection is 97 hours for 743 respondents submitting 1,167 responses.

The number of respondents and burden hours is determined as follows:

Certifications Required from Individuals Receiving Accelerated Payments

We have decided to approximate the number of accelerated payments VA will make in future years by comparing the number of accelerated payments made in FYs 2004 and 2005 with the number of chapter 30 trainees in those years and assuming that the resulting accelerated payment per trainee will remain approximately the same.

During FY 2004, we had 332,031 chapter 30 trainees and we made 1,119 accelerated payments. This means that we made .0034 accelerated payments per trainee in that fiscal year. During FY 2005, we had 336,281 trainees and we made 886 accelerated payments. This means that we made .0026 accelerated payments per trainee during that year. Therefore, we estimate that there will be .003 accelerated payments per trainee in future years.

The following chart shows our projection of the number of chapter 30 claimants who will train during Fiscal Years 2006 through 2008:

Program	FY 2006	FY 2007	FY 2008
Chapter 30	389,658	389,054	389,031

Using these projections, we have assumed an average of 389,000 chapter 30 claimants per year. We therefore expect the annual number of accelerated payment to be 389,000 X .003, or 1,167 accelerated payments. While administering the accelerated payment program, we have made 2,431 payments to 1,548 chapter 30 claimants. This is an average of 1.57 accelerated payments per claimant. Dividing our expected 1,167 payments by 1.57 payments per person gives 743. Therefore, we estimate that 743 respondents will request 1,167 accelerated payments yearly.

The annual cost to the public is \$1,945.14, based on 1,167 responses submitted by 743 respondents.

Hi Tech Verification of Course Completion Letters: The law requires respondents to furnish the title of the course and certify completion of course. VA estimates that a respondent would need approximately 5 minutes to complete this letter. If all 743 respondents submit the 1,167 responses, this computes as 1,167 times 5 minutes or 5,835 minutes. Dividing 5,835 minutes by 60 gives 97.25 hours, which we have rounded down to 97 hours. When 97 hours is multiplied by a cost of \$15.00 per hour, the total cost to the public for completing this hi tech verification of course completion letter would be \$1,455.00.

We estimate all 1,167 responses could be submitted via regular mail. Those responses could incur a postage cost of \$0.39 for a stamp plus \$0.03 for an envelope, for a total cost of \$0.42 for each mailing. Multiplying \$0.42 by 1,167 mailings gives \$490.14.

Summary of cost to the public:

\$ 1,455.00	Hi Tech Course Completion Letter
\$ 490.14	Mailing Cost
\$ 1,945.14	TOTAL

13. This submission does not involve any recordkeeping costs.

14. VA estimates that the total annual cost to the government for administering this collection of information is \$16,825.81 annually.

Certifications Required from Individuals Receiving Accelerated Payments

Certifications Mailed to Respondents:

(1) We estimate mailing 1,167 individual Hi Tech Verification of Course Completion letters yearly to 743 respondents. A GS 9/5 employee will prepare each of these letters. The average salary for a GS 9/5 during calendar year 2006 is \$23.33 per hour. We estimate it will take the employee approximately 10 minutes to prepare each letter. 1,167 letters X 10 minutes per letter gives a total of 11,670 minutes. Dividing 11,670 minutes by 60 gives 194.5 hours. Multiplying 194.5 hours by \$23.33 per hour gives a total cost of \$4,537.69 for this letter.

Certifications Completed by Respondents and Received by VA:

(2) We could receive 1,167 individual Hi Tech Verification of Course Completion letters yearly from 743 respondents. A GS 9/5 employee will review each response for requested course verification. The average salary for a GS 9/5 during calendar year 2006 is \$23.33 per hour. We estimate it will take 26 minutes to review each Hi Tech Verification letter. 1,167 letters X 26 minutes per letter gives a total of 30,342 minutes. Dividing 30,342 minutes by 60 gives 505.70 hours. Multiplying 505.70 hours by \$23.33 per hour gives a total cost of \$11,797.98 for this letter.

(3) We will mail these letters via regular mail. We would mail 1,167 hi tech verification letters. Each of these 1,167 letters would incur a postage cost of \$0.39 for a stamp plus \$0.03 for an envelope, for a total cost of \$490.14.

Summary of cost to the Federal Government:

\$ 4,537.69	Preparing Hi Tech Course Completion Letter
\$ 11,797.98	Review of Hi Tech Course Completion Letter
\$ 490.14	Mailing Cost
\$ 16,825.81	TOTAL

15. The annual burden hours have decreased from the previous request for several reasons. The previous approval was for 1,086 hours and responses of 21,727. Our new hours are 97 and the responses total 1,167. The reduction is due to a revised and more accurate estimate. For our previous estimate, we had simply overestimated the number of individuals would qualify for these accelerated payments. Though regulations give VA authority to allow a school to receive accelerated payment for students, VA has not implemented this regulation, further reducing the burden hours from the previous submission.

16. The OMB approval number is shown in the appropriate pages of the Code of Federal Regulations.

17. The data collection instrument, the Hi Tech Verification of Course Completion letter, is generated from our data processing center. It can take months to update such letters. This letter currently does not display an expiration date. If required to do so, it could create an administrative burden on VA. As this information collection is submitted to OMB for approval every three years, this date requirement would delay agency action on the benefit being sought. VA therefore continues to seek an exemption that waives the displaying of the expiration date.

18. This information collection fully complies with 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.

ATTACHMENTS

- A. 38 U.S.C. 3014A.
- B. 38 Code of Federal Regulations 21.7154(d)(1)
- C. Hi Tech Verification of Course Completion letter