

SUPPORTING STATEMENT FOR VA FORM 22-8979
OMB NUMBER 2900-0465

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay education benefits to veterans and other eligible persons pursuing approved programs of education under chapters 30, 32 and 35, title 38, U.S.C.; chapter 1606 of title 10, U.S.C.; and Section 903 of Public Law 96-342.

38 U.S.C. 3680(g) states that VA may require proof of continued enrollment. VA Form 22-8979 and the electronic versions of this form are used as this proof. This collection obtains certification of actual attendance by the student and verification of that student's continued enrollment before VA releases payment. This collection of information is for both college and non-college degree programs.

a. Generation of Printed Form. Currently, VA extracts claimant information from education data resources and places it into the appropriate blocks of VA Form 22-8979. VA then sends the form to respondents during monthly mailings. Only respondents receiving education benefits under chapter 32 and 35 and enrolled in non-college degree programs receive the printed form. Approximately 0.76% of individuals receive the paper form. Respondents receiving the paper form need five minutes to submit these verifications.

b. Electronic Collection of Information. See Item 3.

The overall average burden per verification continues to be less than 2 minutes per response. (See item 12 for how VA determined this average time.)

The following administrative and legal requirements necessitate the collection:

- A. 38 U.S.C. 3034, 3241, 3680(g); 10 U.S.C. 16136, and Public Law 96-342, Section 903.
- B. 38 CFR 21.4203 (f), 21.4204, 21.5200 (d) & (e), 21.7140 (c), 21.7154 (a), and 21.7654.

2. VA uses the information requested by this collection to determine the individual's continued entitlement to benefits. The collection of this information is essential for the administration of these programs. The student is required to submit the verification on a monthly basis to allow for a frequent, periodic release of payment.

3. Information technology is being used for over 99% of the respondents. Chapter 30 and 1606 respondents must submit this information electronically using either the telephone or the Internet. These respondents represent 99.25% of individuals for this information collection. We have discontinued the paper version for these chapter 30 and 1606 claimants.

(a) Telephone Submission. Respondents can use a touch-tone telephone over a toll-free telephone number to enter their verification information directly into the benefits delivery system. Respondents can use the telephone if they have not changed their enrollment. These respondents only need one minute to submit verifications using the telephone. This toll free telephone number is 1-877-823-2378.

(b) Internet Submission. Respondents use the Internet program called WAVE (Web Automated Verification of Enrollment) to submit their verifications using the Internet. Respondents can use WAVE whether they have changed their enrollment or not. Respondents using WAVE will need one and one-half minutes to submit their verifications if they have not changed their enrollment and four minutes to submit their verifications if they have changed their enrollment. This Internet site is located at "<https://www.gibill.va.gov/wave/default.cfm>"

4. VA is not aware of any duplication of this information collection.

5. The information collection does not involve small businesses or other small entities.

6. Collection of this information on a monthly basis will prevent any overpayment of benefits due to late reporting since payment will not be made until the report has been returned to VA and processed. To collect information less often would preclude VA from making monthly payments under existing regulations.

7. The collection of this information does not require any special circumstances.

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 64338 of the Federal Register dated November 1, 2006. No comments were received in response to this notice.

No consultations outside VA have been held since the last submission for approval. Respondents and schools have a continuing opportunity to provide comments on this form. There are no outstanding comments on this form.

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

10. If changes in enrollment status are reported on the printed version of this form, the form is retained in the respondent's folder. If no changes in enrollment status are reported on the printed version of this form, then, after processing, it is stored in bulk storage at the regional office until it is destroyed.

After processing the different electronic versions of this form, the data is retained electronically for 2 years. Then, these electronic transactions are destroyed.

Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Rehabilitation Records - VA (58VA21/22) which are contained in the Privacy Act Issuances, 2001 Compilation.

11. None of the questions on this form are considered to be of a sensitive nature.

12. The estimated annual burden for the collection of information is 45,733 hours for 2,114,651 responses submitted by 429,488 respondents.

The amount of time that each respondent will need to submit a response depends on the method of the response (paper, Internet or touch-tone telephone).

VA expects that each respondent that submits a response on paper will need an average of 5 minutes to complete and return that response. VA expects to receive 16,687 responses on paper for a total of 83,435 minutes.

VA each respondent that submits a response using the touch-tone telephone will need an average of 1 minute to complete and return that response. VA expects to receive 1,164,257 responses on the touch-tone telephone for a total of 1,164,257 minutes.

VA expects that each respondent that submits a response on using the Internet and does not report a change of enrollment will need an average of 1.5 minutes to complete and return that response. VA expects to receive 895,425 responses on the Internet to report a change of enrollment for a total of 1,343,138 minutes.

VA expects that each respondent that submits a response on using the Internet to report a change of enrollment will need an average of 4 minutes to complete and return that response. VA expects to receive 38,282 responses on the Internet to report a change of enrollment for a total of 153,128 minutes.

Submission	# of Responses	Minutes Each	Total Minutes
paper	16,687	5.0	83,435
touch-tone	1,164,257	1.0	1,164,257
Internet (no change)	895,425	1.5	1,343,138
Internet (change)	38,282	4.0	153,128
	2,114,651		2,743,958

The total minutes of 2,743,958 total minutes divided by 60 gives 45,732.63 hours. Rounding this up to the next even hour gives 45,733 hours.

The 2,743,958 total minutes divided by 2,114,651 verifications gives 1.2975937 minutes for an average time per response. Although not mathematically accurate, VA has rounded this figure up to arrive at an estimated average generic response time of 1.3 minutes. If an individual would multiply this 1.3 average minute figure by the 2,114,651 verifications, he or she would not arrive at either the 2,743,958 total minutes or the 45,733 hours.

The annual cost to the public is \$ 921,662.54, based on 2,114,651 responses. This cost is composed of the following:

Submission	Number	Minutes Each	Total Minutes	Cost (at \$20/Hr completion time)
paper	16,687	5.0	83,435	\$ 27,812
touch-tone	1,164,257	1.0	1,164,257	\$388,086
Internet (no change)	895,425	1.5	1,343,138	\$447,713
Internet (change)	38,282	4.0	153,128	\$ 51,043
	2,114,651		2,743,958	\$914,654

The cost to the claimant for completing the 2,114,651 submissions totals \$914,654.

Mailing costs of \$7,008.54 per year, based on sending 16,687 paper forms to VA, at 42¢ each. (While a self addressed envelope is enclosed with this certification form, the respondent has to use a first class postage stamp to return the paper form to VA for processing.) Respondents submitting information using electronic means do not have any submission or mailing costs.

Summary of cost to the public:

\$ 914,654.00	Completion Times
\$ 7,008.54	Mailing
\$ 921,662.54	TOTAL

13. This submission does not involve any record keeping costs.

14. The estimated annual cost to the Federal Government is \$ 283,979.27 based on 2,114,651 responses.

The annual cost to the Federal Government is composed of the following:

The following is the costs for submissions returned on VA Form 22-8979:

For responses returned on the paper version of VA Form 22-8979 which do not involve a change in enrollment status (approximately 95% of 16,687 responses or a total of 15,853), processing will be by a GS 4 step 5 clerk. The clerk will need 2 minutes to process the response, thus processing 30 responses per hour. To process all 15,853 responses, the clerk would have to work 528 hours. The cost to the government using \$13.76 per hour, would be \$7,265.

For responses returned on the paper version of VA Form 22-8979 which do involve a change in enrollment status (approximately 5% of 16,687 responses or a total of 834), the response is processed by a claims examiner (GS9/5). The claims examiner will need 20 minutes for processing each response. To process all 834 responses, the claims examiner would have to work 278 hours. The cost to the government for processing 834 responses at \$23.33 per hour totals \$6,486. Total paper costs are \$13,751.

The toll-free telephone system only takes responses that do not involve a change in enrollment status. To maintain this system and to process these responses during FY 2005, VA incurred a maintenance cost of \$18,088. VA anticipates that for future years, the annual maintenance cost will be the same amount. After receiving the information, VA simply moves the electronic information from one data file to another data file.

WAVE (the Internet system) takes both responses that do and do not involve a change in enrollment status. During FY 2005, VA incurred a maintenance cost of \$18,300 for this system. VA anticipates that for future years, the annual maintenance cost will be the same amount.

WAVE responses are 895, 425 “no change” responses and 38,282 “change” responses.

For those 895,425 WAVE responses that do not involve a change in enrollment status, the WAVE system sends a computer transaction to update the respondent’s education record. There is no resulting cost for this data exchange.

For those 38,282 WAVE responses that do involve a change in enrollment status, the transactions depend on whether the response increases the number of hours or decreases the number of hours. Approximately 60% of responses that have reported changes in enrollment (or 22,969 responses) are for decreases in hours while only 40% (or 15,313 responses) are for increases in hours.

Decreases in hours are processed by a claim examiner (GS9/5). The claims examiner will need 20 minutes for processing each response; thus processing three responses per hour. To process these 22,969 responses, the claims examiner would have to work 459,380 minutes or 7,656 hours. The cost to the government for processing 22,969 responses at \$23.33 per hour would be \$178,614.

Increases in hours are processed by a claim examiner (GS9/5). The claims examiner will need 8 minutes for processing each response; thus processing 7.5 responses per hour. To process these 15,313 responses, the claims examiner would have to work 2,041 hours. The cost to the government for processing 15,313 responses at \$23.33 per hour would be \$ 47,617.

Administrative costs are as follows:

Costs for printing 16,687 forms at \$30 per thousand totals \$500.61

Costs for mailing 16,687 forms using first class stamp at 39¢ each totals \$6,507.93.

Costs for 16,687 mailing envelopes at \$18 per thousand totals \$300.37.

Costs for 16,687 return envelopes at \$18 per thousand totals \$300.37

All of the above administrative costs total \$7,609

Summary of cost to the Federal Government:

\$ 13,751.00	Paper Certifications (VA Form 22-8979)
\$ 18,088.00	Toll Free Telephone Maintenance
\$ 18,300.00	Internet Maintenance
\$ 000.00	No Change Internet Certifications
\$ 178,614.00	Change Internet Certifications (decreased enrollment)
\$ 47,617.00	Change Internet Certifications (Increased enrollment)
\$ 7,609.00	Administrative Costs
\$ 283,979.00	TOTAL

15. The change in the burden (+ 158 hours) is caused by an overall increase in the number of claimants training.

16. VA does not publish this information or make it available for publication.

17. The paper version of VA Form 22-8979 is computer generated. Neither the paper nor the electronic versions of this information collection display an expiration date. If VA were required to do so, it would result in unnecessary time and expense for programming the new date on both versions. As this information collection is submitted to OMB for approval every three years (as required by OMB), this date requirement would also result in an unnecessary burden on the respondents and would delay VA action on the benefit being sought. VA also seeks to minimize the cost to itself of collecting, processing and using the information, by not displaying the expiration date. For these reasons, VA continues to seek an exemption that waives the displaying of the expiration date both on the paper version of VA form 22-8979 and the electronic versions of this information collection.

18. The information collection complies with all 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. 3034, 3241, 3680(g); 10 U.S.C. 16136; and Pub. Law 96-342, Sect. 903
- B. 38 CFR 21.4203 (f), 21.4204, 21.5200 (d) & (e), 21.7140 (c), 21.7154 (a), and 21.7654
- C. VA Form 22-8979
- D. Touch Tone Telephone Information (questions and responses)
- E. WAVE Information (screens)