

SUPPORTING STATEMENT FOR VA FORM LETTER 22-315
OMB NUMBER 2900-0118

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.; chapters 1606 and 1607 of title 10, U.S.C.; Section 903 of Public Law 96-342; and the NCS (National Call to Service) (10 U.S.C., chapter 31, section 510). This information collection is necessary when a student is receiving Department of Veterans Affairs (VA) education benefits while enrolled at two training institutions. The institution at which the student pursues his approved program of education must verify that courses pursued at a second or supplemental institution will be accepted at full credit toward the student's course objective. Educational payment for courses pursued at the second institution are not payable unless evidence is received to verify that the student is pursuing his or her approved program while enrolled in these courses. VA Form Letter 22-315 serves as this certification of acceptance of credit.

VA Form Letter 22-315 is sent to the student by a VA claims examiner. The letter directs the student to have the certifying official of his or her primary institution complete the information on the reverse side of the form. The certifying official at the primary institution uses the letter to list the course or courses pursued at the second institution for which the primary institution will give full credit. Copies of the letter are sent to both the primary and secondary institutions. The certifying official at the primary institution sends the completed letter to the VA regional office. Alternately, this certifying official may send in the information electronically using the VA-ONCE system. The claims examiner then determines whether education benefits can be authorized for these courses based on this information. Without this information, benefits cannot be authorized for any courses pursued at any other institution than the primary institution.

The following administrative and legal requirements necessitate the collection and are attached:

- A. 38 U.S.C. 3002(3), 3014, 3202(2), 3231(a)(3), 3452(b), 3501(a)(5), 3531(a); 10 U.S.C. 16136(b), 16166(b) and section 510 of chapter 31
- B. 38 CFR 21.4233(b), 21.5070, 21.5131, 21.7070, 21.7630

2. VA has used information from the current collection to ensure that claimants are pursuing their approved program while enrolled at a supplemental school. Without this information, VA might underpay or overpay benefits. OLAF, the current school approval system for the VA, provides the information regarding parent/secondary school and can be accessed by the education claims processor to determine approval status at the time the student applies for education benefits. The approved schools also have certifying officials that are there to help guide the student through the process of insuring that the courses they are taking are approved.

3. Information technology is being used to reduce this burden. Schools can use the VA-ONCE system to report this information back to VA. We estimate about 70% will use VA-ONCE.

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

5. The information collection does not have a significant impact on a substantial number of small schools. It cannot be reduced for small enrollment schools as the information collected is required by statute. The form must be submitted for any student receiving VA educational benefits who pursues a course at a school other than the school from which he or she plans to receive a degree. The information to be provided must be uniform and consistent regardless of the size of the school. This form letter requires minimal input from school officials. The school or training institution is required to complete only three items (course designation and title, signature and title of certifying official, and date) on the Form Letter 22-315.

6. If this information is not collected or is collected less often, VA might underpay or overpay benefits. There are no technical or legal obstacles to reducing the burden.

7. No special circumstances apply.

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 76726 and 76727 of the Federal Register dated December 21, 2007. No comments have been received.

Consultations pertaining to the content of the form have not been held outside VA since the last submission for approval. However, claimants have a continuing opportunity to comment on this form. Currently, there are no outstanding comments on this form.

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

10. If the school responds, the form letter (or the electronic certification) is retained permanently in the student's education folder. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Rehabilitation Records - VA (58VA21/22) which is contained in the Privacy Act Issuances, 2001 Compilation.

11. None of the information collected is considered to be of a sensitive nature.

12. The estimated annual burden for the collection of this information is 1,050 hours.

This figure represents the number of annual responses (6,300) multiplied by 10 minutes, the time required to gather the information and complete the certification. We project that a respondent will only submit one of these forms per year. We based the estimate of 10 minutes on our experience. We did not conduct a special survey to determine this estimate.

The annual gross cost to the public is \$18,396 based on 6,300 responses. By assigning a value of \$15.00

per hour to the time of the school officials who complete VA Form Letter 22-315 and with an average completion time of 10 minutes, the cost of information collection activity is estimated to be \$15,750. The cost of mailing the form is estimated at \$2,646 based on 6,300 responses at \$.42 each.

The annual cost to the public is partially offset by the annual reporting fee paid to schools. VA estimates that \$3,315 of this reporting fee is attributable to this information collection

VA pays each school that furnishes training under the various education programs a fee for processing all required VA reports or certifications for each veteran or other VA education claimant. VA refers to these fees as "school reporting fees" which help to defray the costs of processing paperwork required to be submitted to VA. The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77, effective August 31, 1967 and can be found in 38 U.S.C. 3684.

Summary of cost to the public:

	\$ 15,750	VA Form Letter 22-315
Plus	\$ 2,646	Total Mailing Cost_
Minus	\$ 3,315	Minus Reporting Fee_
	\$ 15,081	Total Public Cost_

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

14. The annual cost to the government for administering these forms is estimated at \$55,225 based on 6,300 annual responses.

This cost is composed of the following:

- a. A processing cost of \$ 43,533 based on the salary of an claims examiner (GS-9 step 5 with an hourly salary of \$20.73) and a processing time of 20 minutes per response.
- b. The prorated reporting fee as discussed in item #12 above.
- b. Administrative and printing costs totaling \$8,377.

Summary of costs to the Federal Government:

\$ 43,533	Processing cost for VA Form Letter 22-315 (GS 9/5)
\$ 3,315	Prorated Reporting Fee Payment
\$ 8,377	Administrative and printing costs
\$ 55,225	TOTAL GOVERNMENT EXPENSE

15. There is an adjustment of 2,500 downward due to a re-estimate of the usage. This letter is required less often than previously estimated.

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

17. The collection instrument, VA Form Letter 22-315, may be reproduced and/or stocked by regional offices and training establishments. This form does not display an expiration date, and if

required to do so, would result in unnecessary waste of existing stocks of this forms. As this form is submitted to OMB for approval every three years, this date requirement would 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 exception that waives the displaying of the expiration date on VA Form Letter 22-315.

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.