

**SUPPORTING STATEMENT FOR VA FORM 22-1999v,
CERTIFICATE OF DELIVERY OF ADVANCE PAYMENT AND ENROLLMENT
(2900-0325)**

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational assistance to veterans and other eligible individuals pursuing approved programs of education under 38 U.S.C. chapters 30, 32, and 35, section 903 of Public Law 96-342, 10 U.S.C. chapters 1606, 1607, and chapter 31, section 510. If certain requirements are met, VA is authorized to issue payments in advance of the beginning date of training. The schools deliver advance payments and are required by law to certify the deliveries to VA. The schools are also required to report the following to VA: the failure of the student to enroll; an interruption or termination of attendance; or, a finding of unsatisfactory attendance conduct or progress.

The following administrative and legal requirements necessitate the collection:

- a. 38 U. S. C. sections 3034, 3241, 3531, 3680(d), 3684, and 10 U.S.C. sections 510(c), 16136(b), and 16166(b).
- b. Public Law 96-342, Section 903.
- c. 38 CFR sections 21.4138(a), 21.4203(a) and (d), 21.5135, 21.5200(d), 21.5292(e)(2), 21.7151(b), and 21.7640(d).

2. VA uses the information from the current collection at the beginning of each school term to ensure that advance payments have been delivered. VA also uses the information collection to determine whether the student has increased, reduced, or terminated training.

3. There is currently no means to collect this information electronically. Difficulty with electronic signatures precluded us from having it submitted electronically. We would need multiple signatures for each form. This is a small collection so impact would be minimal.

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

5. The information collection does not have a significant impact on small entities. The form must be submitted for any student receiving an advance payment of educational assistance from VA. The information provided must be uniform and consistent regardless of the size of the school.

6. Delivery of advance payment of educational assistance cannot be confirmed without a completed form. The collection of information must be done immediately after the school delivers the advance payment to the student. The information collection prevents an overpayment or underpayment of benefits. If the information was not collected or collected less often, VA would be unable to prevent incorrect payments.

7. The collection of the 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 17627-17628 of the Federal Register dated April 9, 2007 and page 34070 of the Federal Register dated June 20, 2007. Students and schools have a continuing opportunity to provide comments on this form. There are no comments outstanding on this form.

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

10. If a change in enrollment status is reported, the form is retained permanently in the veteran's or eligible person's education folder. Forms that do not show changes in enrollment status are stored at the RPO (Regional Processing Office) of jurisdiction. After a period, old forms are destroyed in accordance with the VA directives. 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 information collected is considered to be of a sensitive nature.

12. The estimated annual burden for the collection of this information is 1,551 hours based on a total of 18,614 responses. The estimated number of respondents (schools) is 2,807. We continue to estimate the school will need approximately five minutes to complete and process each VA Form 22-1999v. We have received no comments, which question this estimate.

The estimate is determined as follows:

a. The number of respondents is 2,807. This amount is based on the number of educational institutions using the form that have veterans and other eligible persons enrolled and received an advance payment during an average school year.

The total annual responses is 18,614. The total annual responses represents the total number of responses expected, not the actual number of responses.

This amount varies according to the number of students who receive educational benefits at the educational institution. An educational institution with few VA beneficiaries enrolled may use only one form per year while an educational institution with a large number of VA beneficiaries may use 100 forms per year. We estimate that an average school will receive, complete, and return an average of 2.32675 VA Form 22-1999v for the total of 18,614 responses. This method has 8,000 schools submitting 18,614 forms in a year.

c. The school will need approximately five minutes to complete and process each VA Form 221999v.

d. Multiply the total number of responses (18,614) by the time required per response to get the annual burden estimate (i.e., 18,614 response hours X 1/12 of an hour = 1,551 hours).

13. The annual cost to the public for is ZERO because the schools and training establishments are paid an annual reporting fee for handling advance payments.

14. This information collection does not involve any record keeping costs. The annual cost to the Government for administering the form is estimated to be \$218,518 based on 18,614 responses annually. This cost is determined as follows:

- a. The cost of \$19,097 for processing 16,752 responses that do not involve a change in enrollment status (i.e., approximately 90% of 18,614 responses gives 16,752 no change forms). This amount is based on a processing time of five minutes per response in the Finance activity at the RPO using the salary of a GS 5/5 Finance clerk (i.e., hourly salary of \$13.68). The clerk can process 12 forms per hour. Dividing 16,752 by 12 gives 1,396 hours. Multiplying 1,396 hours times \$13.68 per hour gives \$19,097.
- b. The cost of \$14,488 for processing 1,862 responses that do involve a change in enrollment status (i.e., approximately 10% of responses). This amount is based on a processing time of 20 minutes (i.e., 1/3 of an hour) per response in the Education division at the RPO using the salary of a GS 9/5 claims examiner (i.e., hourly of \$23.33). The claims examiner can process three forms per hour. Dividing 1,862 by 3 gives 621 hours. Multiplying 621 times \$23.33 gives \$14,488.
- c. The portion of the annual reporting fees paid to schools and training establishments is \$ 23,277. This amount is determined by multiplying \$3,683,000 (i.e., the total reporting fee paid to educational institutions for calendar year 2005) by .00632 (i.e., the estimated portion of the reporting fee attributable to the completion of this form). Calendar year 2005 is the last year for which the annual reporting fees are available.
- d. The administrative cost is \$783. This amount consists of the cost for printing and distributing 18,614 forms.

Summary of cost to the Federal Government:

\$ 19,097	No Change Certifications
\$ 14,488	Change Certifications
\$ 23,277	Reporting Fee Cost
\$ 783	Administrative Cost
\$ 57,645	TOTAL

15. The requested burden estimate of 1,551 hours represents an increase of 418 hours from previous submission. This increase is due to normal program growth and a re-estimate of the number of advance payments.

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

17. The collection instrument, VA Form 22-1999v, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date and if required to do so, it would result in unnecessary waste of the existing stock of this form. As these forms are submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay Department 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 on VA Form 22-1999v.

18. This information collection fully complies with the requirements of 5 CFR 320.8(b)(3).

B. Collection of Information Employing Statistical Methods.

This collection of information by the Veterans Benefits Administration does not employ statistical methods.

Attachments:

Revised VA Form 22-1999v

Citations

Citations for VA 22-1999v:

Title 38, United States Code, Part III, Chapter 30, Subchapter IV, Section 3034:
TITLE OF SECTION: Program Administration.

Title 38, United States Code, Part III, Chapter 32, Subchapter IV, Section 3241:
TITLE OF SECTION: Requirements.

Title 38, United States Code, Part III, Chapter 35, Subchapter IV, Section 3531:
TITLE OF SECTION: Educational Assistance Benefits.

Title 38, United States Code, Part III, Chapter 36, Subchapter II, Section 3680:
TITLE OF SECTION: Payment of educational assistance or subsistence allowances.

Title 38, United States Code, Part III, Chapter 36, Subchapter II, Section 3684:
TITLE OF SECTION: Reports by veterans, eligible persons, and institutions; reporting fee.

Title 10, United States Code, Subtitle E, Part IV, Chapter 1606, Section 16136:
TITLE OF SECTION: Administration of Program.

Title 10, United States Code, Subtitle A, Part II, Chapter 31, Section 510
TITLE OF SECTION: Enlistment incentives for pursuit of skills to facilitate national service.

Title 10, United States Code, Subtitle E, Part IV, Chapter 1607, Section 16166
TITLE OF SECTION: Administration of Program.

Public Law 96-342, Section 903.