SUPPORTING STATEMENT FOR
APPLICATION FOR REIMBURSEMENT OF NATIONAL TEST FEE
(2900–NEW)

A. Justification.

1. Public Law 108-454 authorizes the Department of Veterans Affairs (VA) to reimburse claimants for the amount of the fees charged for national exams for admission and national exams for credit. Section 106 of Public Law 108-454 allows eligible persons under chapters 30, 32, and 35 of title 38, U.S.C., to receive reimbursement for approved national tests for admission to institutions of higher learning or graduate schools and for national tests providing an opportunity for course credit at institutions of higher learning. The corresponding statutes are 38 U.S.C. 3032(g)(1), 3232(d) and 3532 (g)(1) respectively. The Department of Defense (DoD) has authorized reimbursement for these national tests under chapters 1606 and 1607 of title 10, U.S.C. These corresponding statutes are 10 U.S.C. 16131 and 16162 respectively. DoD's implementation guidelines for the National Call to Service (NCS) program also allow reimbursement for national tests under that educational assistance program (title 10 U.S.C. 510). As required under 38 U.S.C. 5101, and 21 CFR 1030, an eligible individual must apply to VA in order to receive an education benefit administered by VA. VA has developed VA Form 22-0810, Application for Reimbursement of National Test Fees, for claimants' use in submitting information necessary to receive reimbursement for national test fees.

2. VA will use the information collected to determine whether the claimant qualifies to receive reimbursement for a claimed national test, and if so, the amount of the reimbursement.

3. Information is collected when the student applies for reimbursement of the fees required to take the national test. An electronically fillable format of VA Form 22-0810 will be made available on VA's website for the claimant to fill out, print, and submit to VA. At the present time, this method of collecting the information is the most efficient and causes the least burden on the public. While information technology cannot currently be used to further reduce the burden of this information collection, our ultimate goal is to allow for all claims to be filed electronically.

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

5. The information collection for reimbursement of national test fees only affects individual claimants. There is no significant impact on education institutions or small businesses.

6. If this information is not collected, VA will not be able to administer the reimbursement of national test fees as required by statute.

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

8. The notice was published on page 44614 of the Federal Register dated August 8, 2007. No comments have been received in response to our notice.

9. VA does not provide any gifts to respondents.

10. This information will be scanned and retained permanently in the claimant's electronic education folder. Paper documents are destroyed one year after the receipt of the paper document. Education records are destroyed periodically. If the claimant's electronic folder is destroyed, the document image on which the information is collected will also be destroyed. Confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Rehabilitation Records – VA (58VA21/22), contained in the Privacy Act Issuances, 2001 Compilation.

11. None of the information collected is of a sensitive nature.

12. The estimated annual burden for the collection of this information is 250 hours, with submission by 1,000 respondents (15 minutes x 1,000/60=250). To arrive at this number of respondents, we used 626, the actual figure for claims submitted for national test fees in fiscal year 2007, and estimated the number of additional claims that would be made under MGIB-SR (1606), REAP (1607), and NCS. We estimate that each respondent will need 15 minutes to complete the request.

The annual net cost to the public is $3,750, based on 250 hours times $15.00.

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

14. The estimated cost to the Federal government is $5,770. VA calculated this amount as follows:

A GS 9, step 5 claims examiner ($21.08 hourly) needs 15 minutes to process the form. In order to process 1,000 forms, the claims examiner needs a total of 15,000 minutes or 250 hours. Multiplying this number by the hourly rate of $21.08 produces a total of $5,270 in processing costs.

We anticipate having mailing costs of $440 per year based on mailing 1,000 forms (41 cent stamp and 3 cents for envelope).

We anticipate having printing costs of $60.00 for 2,000 forms.

15. New burden hours. Due to an oversight resulting from an effort to expedite claims processing, VA has been collecting this information without OMB approval. As a result of this oversight coming to our attention, we are submitting this request for OMB approval.

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

17. The collection instrument, VA Form 22-0810, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date. It is anticipated that only a small number of these forms will be used each year. Reprinting the form to revise the expiration date would result in unnecessary waste of existing stocks of this form and unnecessary burden on the respondents, possibly delaying Department action on the benefit being sought. By not displaying the expiration date on this form, VA also seeks to minimize the cost of collecting, processing, and using the information. For these reasons, VA seeks an exemption from displaying the expiration date on VA Form 22-0810.

18. This information collection fully complies with all the requirements of 5 CFR 1320.9 and 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.