

SUPPORTING STATEMENT FOR VA 38 C.F.R. § 21.4256(b)(3)
Certificate of Affirmation of Enrollment
Agreement for Correspondence Course
(2900-0576)

A. Justification.

1. The Department of Veterans Affairs (VA) is required to pay educational benefits for correspondence training under chapters 30, 32, 35 of title 38, U.S. Code, chapter 1606 and chapter 1607, of Title 10, U. S. Code, and section 903 of Public Law 96-342. VA cannot pay education benefits until the claimant affirms in writing the enrollment agreement for the correspondence course after the expiration of 10 full days after the date that he or she signed the correspondence contract. The statute provides this requirement. We have devised a form to assist in this consumer protection. The claimant receives VA Form 22-1999c, Certificate of Affirmation of Enrollment Agreement for Correspondence Course. If he or she does not affirm the contract, he or she destroys this form. He or she may then notify the correspondence school of this decision. If he or she affirms the contract, he or she enters a date not earlier than the 12th day after the date the contract or agreement was signed and then signs the form. The claimant then sends the completed form to the correspondence school. The correspondence school's Certifying Official attaches an enrollment certification to VA Form 22-1999c, and sends both forms to VA for processing.

The following statutes and regulations require this information collection:

- a. 38 U.S. Code 3686(b)-Correspondence Courses.
- b. 10 U.S. Code 16136(b)-Reserve Components.
- c. 10 U.S. Code 16166(b)(chapter 1607)-Program Management.
- d. 38 Code of Federal Regulations 21.4256(b)-Correspondence Programs and Courses.

2. VA has used information from the current collection to pay education benefits for correspondence training. Without this information, VA could not determine if the claimant has been informed of the 10 day reflection period required by law and would not be able to determine whether or not to pay education benefits for correspondence training.

3. VA has converted this form into an electronic fillable format which is available on the Internet. At this time, due to funding restrictions, this form cannot be programmed in such a way as to submit it electronically. Education Service hopes to be able to address this problem in the near future.

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

5. The information collection only affects individual claimants eligible for education benefits based on correspondence training. There is no impact on all education institutions or small businesses.

6. This information is collected only when a claimant requests education benefits based on an approved correspondence course. If this information is not collected or were collected less often, VA may not be able to properly administer payments. VA could not determine if the claimant has been informed of the 10 day reflection period required by law and would not be able to determine whether or not to pay education benefits for correspondence training. There are no technical or legal obstacles to reducing the burden on this information collection.

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 58737-58738 of the Federal Register dated October 16, 2007, Volume 72, Number 199. There were no comments received on this information collection.

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

10. VA Form 22-1999c is retained in the claimant's education records. Our assurance of confidentiality is covered in VA's System of Records, Compensation, Pension, Education, and Rehabilitation Records - VA (58VA21/22), that are contained in the Privacy Act Issuances, 1999 Compilation.

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

12. The estimated annual burden to the public is 48 hours. This estimate is determined as follows:

Number of Respondents	952
Average Number of Responses Annually (Per Respondent)	1.00
Number of Responses Annually	952
Time Per Response	3 minutes
Annual Response Burden	48 hours

The average number of claimants who entered correspondence courses for FY 2004, FY 2005, and FY 2006 was 952. It is estimated that the same number of claimants will enter correspondence courses annually in FY 2007 through FY 2010. The amount of time for each submission remains 3 minutes.

13. This submission does not involve any record keeping costs. The estimated annual burden to the public is \$720 based on 48 hours (\$15.00 x 48 hours).

14. This submission does not involve any record keeping costs. The annual cost to the Federal Government for administering this information collection activity is \$1,303 based on 952 responses.

a. A processing cost of \$1,003. This cost is based on each of the 952 responses taking approximately 3 minutes to process by a GS 9/5 clerk (\$21.08 hourly wage) located in the Education Division at a VA regional office.

b. An administrative cost of \$300. This amount is based on the costs for forms development, design, printing and distribution.

15. The current estimate for the total annual burden is 48 hours. This reduction of annual burden is due to the decrease in the total number of students that enroll in correspondence courses. The dramatic increase of online courses and variable times for courses now available at institutions, is directly associated with this decrease.

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

17. The collection instrument, VA Form 22-1999c does not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this form. As this information collection is submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay agency 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 seeks an exemption that waives the displaying of the expiration date on VA Form 22-1999c.

18. This information collection complies with all requirements for fully informing respondents of the information under 5 Code of Federal Regulations 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.