

Supporting Statement for VA Forms 22-1990, 22-1990E and 22-1990N
OMB Number 2900-0154

A. Justification.

1. In order to receive VA Educational Assistance Allowance under chapters 30 and 32 of title 38, U.S.C., chapters 1606 and 1607 of title 10, U.S.C., and sections 901 and 903 of Pub. Law 96-342, veterans, servicepersons, and reservists must complete VA Form 22-1990, Application for Education Benefits. Each individual completes the form only once.

The following administrative and legal requirements necessitate the collection:

38 U.S.C. 3034; 3241, 3471, 5101(a); Pub. Law 96-342, sections 901 and 903; 10 U.S.C. 16136(b), and 16166(b), Pub. Law 107-314, section 531 and Pub Law 107-107, section 654.

2. Claimants complete VA Form 1990 to submit an initial (or "original") claim for VA education benefits. The information requested is used determine the applicant's eligibility to education benefits listed in number 1. In order to avoid confusing as to which benefits claimants should apply for, VA streamlined VA Form 22-1990 removing references to the National Call to Service and Transfer of Entitlement and created new applications for these programs. These programs will now be requested on VA Form 22-1990E, Application for Transfer of Entitlement (TOE), Basic Educational Assistance Under the Montgomery GI Bill and VA Form 22-1990N, Application for VA Education Benefits Under the National Call to Service (NCS) Program.

3. Information technology is being used to reduce this burden. Claimants have the option of using VONAPP (Veterans On-Line Application) to submit VA Form 22-1990 information via the Internet. VA Forms 22-1990E and 22-1990N will be added to VONAPP when funding becomes available.

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

5. The information collection only involves individuals (veterans, servicepersons and reservists). There is no impact on educational institutions or small businesses.

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

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 page 10335 of the Federal Register dated February 26, 2008. No comments were received in response to this notice.

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

10. VA Form 22-1990 is retained permanently in the student's education file. VA assurance of confidentiality is covered by VA 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 the applications are considered to be of a sensitive nature.

12. VA has updated the estimated annual burden for this collection of information due to streamlining the application itself. VA burden estimate is 49,399 hours for 179,631 responses.

The number of respondents and burden hours:

The chart below includes the actual number of trainees from Fiscal Year (FY) 2007 and the projected number of trainees for FY 2008 and FY 2009. The projected numbers are from Education Service’s Strategic Development team and are considered valid estimates based on past performance:

Program	FY 2007	FY 2008	FY 2009
Chapter 30	343,751	345,814	347,888
Chapter 32	568	562	557
Chapter 1606	60,298	61,263	62,243
Chapter 1607	41,388	41,429	41,471
Total	446,005	449,068	452,159

Of the total number of trainees for FY 2007, 178,402 were original claims, or roughly 40% of total claims received that year. Using that ratio, VA expect that approximately 179,627 original claims will be filed in FY 2008 and roughly 180,864 original claims will be received in FY 2009. This provides an average of 179,631 original claims expected yearly.

Each claimant has the option of filing VA Form 22-1990 electronically using the VONAPP program or on paper. Claimants must complete and submit the paper version of VA Forms 22-1990E and 22-1990N. VA estimate that it takes 15 minutes for the average claimant to complete and return the paper version of VA Form 22-1990, 22-1990E, and 22-1990N and an estimate of 20 minutes for the average claimant to complete either electronic means of submitting the VA Form 22-1990. VA records show that approximately 30% of claimants apply using the VONAPP computer application.

Type of Submission	%	Number	Minutes Each	Hours
VONAPP	30%	53,889	20	17,963
paper	70%	125,742	15	31,436
	100%	179,631		49,399

The total time for the public to submit 179,631 applications (paper or electronic) is 49,399 hours. Dividing 49,399 hours by 179,631 submissions gives an average of 16.50 minutes per submission.

The cost to the public for completing the submissions at \$15 per 49,399 burden hours is \$740,985.

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

14. The estimated annual cost to the Federal Government for administering this collection of information is \$2,851,890.30 based on 179,631 responses annually:

a. For the approximate 125,742 applications submitted on paper, a GS 4 step 5 clerk at \$12.75 per hour scans the paper form into The Image Management System (TIMS), an electronic file system. This step should take approximately 5 minutes per application x 125,742 x \$12.75/60 = \$133,600.88.

b. After scanning, each application is processed by a GS 9 adjudicator at GS 9 step 5 rate (\$21.61). The adjudicators will need approximately 40 minutes to process each original claim. The cost to the government for processing all 179,631 responses is 40 minutes x 179,631 x \$21.61/60=\$2,587,883.94.

c. For the responses submitted through VONAPP the data is simply moved from one file to another. However, the GS 4 step 5 clerk has to scan the claimant's signature, once received, into this electronic file system. The clerk will need approximately 30 seconds to scan each of the approximate 53,889 signature pages. The cost to the government for scanning 53,889 signatures at \$12.75 per hour is \$3,435.42. (53,889 x \$12.75 x 0030 seconds/60=\$3,435.42.

d. VA also incurs a yearly maintenance cost for the VONAPP application of \$5,000.

e. Administrative costs are as follows:

Cost for printing 125,742 paper forms, at \$30 per thousand, totals \$3,772.

Approximately one half of the 125,742 forms are mailed directly to the claimant, or 62,871 forms. Mailing the forms costs \$27,874 (assuming a first class stamp of 41¢ and an envelope costing 03¢ for a total of 44¢).

Approximately one half of the 125,742 forms are bulk mailed to schools for distribution to claimants. VA has the printing contractor place 100 forms in a standard pack and then mails these 634 packets (approximate weight one pound) to schools. The cost of mailing one of the packets is approximately \$1.44. To mail 634 packets at \$1.44 each totals \$912.96.

Total mailing costs for mailing 62,871 paper forms to claimants is \$27,663.24.

Total mailing costs for mailing 62,871 bulk packages of forms to schools is \$912.96.

Total administrative costs (printing =\$3,772, mailing =\$118,197.48) is \$121,969.48.

Summary of cost to the Federal Government:

\$ 137,036.88	Scanning in paper forms and scanning VONAPP signatures
\$ 2,587,883.94	Adjudicating Claims
\$ 5,000.00	Maintenance of VONAPP website
\$ 121,969.48	Administrative Costs
\$ 2,851,890.30	Total

15. The decrease is due streamlining the application, omitting duplicate questions, and wasted white space. The numbers used in this submission are more realistic than previously reported. Previously, the estimated time for a claimant to complete the VA Form 22-1990 on paper was 60 minutes. By removing benefits that do not apply to most applicants and creating separate VA Form 22-1990E and VA Form 22-1990N, VA estimate approximately 15 minutes per application. Additionally, VONAPP submissions were thought to take approximately 45 minutes to complete. VA found that 20 minutes is more realistic.

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

17. The collection instruments, VA Form 22-1990, VA Form 22-1990E and VA Form 22-1990N may be reproduced and/or stocked. These VA forms do not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of this form. As these forms are submitted to OMB for approval every 3 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 the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-1990, VA Form 22-1990E and VA Form 22-1990N.

18. This information collection fully complies with all 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.