SUPPORTING STATEMENT FOR VA FORM 22-8690,
OMB NUMBER 2900-0379

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay work-study allowance to veterans and other eligible persons pursuing approved programs of education under: Chapters 30, 31, 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).

VA Form 22-8690 serves as the report of hours completed by the trainee. VA's policy is that this form should be submitted after the student completes at least 50 hours of work.

2. VA uses the information collected on these forms to ensure that the amount of benefits payable to the student who is pursuing work study is correct. Without this information, VA would not have a basis upon which to make payment.

3. At the current time, electronic submission is not an option for this collection of information. This form is not completed by the general public. Both the supervisor of a work-study student and the work-study student complete this form. The risk of fraud is too great for VA to permit this form to be available to the general public on the Internet.

OMB stated the following in the previous TERMS OF CLEARANCE. "VA plans to convert this form to an electronic format, in compliance with the Government Paperwork Elimination Act. Upon resubmission of this collection, VA shall demonstrate GPEA compliance." Prior to the previous submission, VA was considering a total reengineering of education claims processing which might have included the automation of this form. However, this project has been delayed indefinitely.

There are still a number of technical problems to be overcome to automate this collection. VA needs to resolve the electronic signature issue and to develop a system that would include electronic signatures as well as this particular collection. In this case, the system would have to allow for multiple electronic signatures. If VA successfully implements electronic signature, VA will consider whether electronic signature can be used for this particular information collection.

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

5. The information collection cannot be reduced for small schools or other reporting organizations. The form must be submitted for any student receiving work-study benefits. The information provided must be uniform and consistent regardless of the size of the school or other reporting organization.

6. Payment of work-study benefits cannot be made without a completed form.

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 6767- 6768 of the Federal Register dated February 5, 2008. There were no comments received.

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

10. VA Form 22-8690 is retained permanently in the finance activity at one of the regional processing offices to support the payments, which have been made. VA assurance of confidentiality is covered by VA System of Records, <u>Compensation, Pension, Education and Rehabilitation Records - VA (58VA21/22)</u> which is contained in the Privacy Act Issuance's, 2001 Compilation.

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

12. The estimated annual burden for the collection of this information is 9,167 hours. The cost to the public is $137,505 based on 9,167 hours at $15.00 per hour.

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

14. The annual cost to the government for administering this form is estimated at $555,759. This cost is composed of the following:

   a. VA's cost to process the information. This cost is based on the processing time of 15 minutes per response in the Finance Division in a VA regional processing office using an annual salary of a GS 7/5 Accounts Receivable Analyst at $19.99 per hour. Multiplying processing time of 15 minutes by the hourly rate of $19.99 and then multiplying that product by 110,010 responses and dividing by 60 results in an annual cost of $549,775.

22-8690 Processor	Hourly wage	Processing Time	Total 8690s	Total Cost
GS 7, step 5 A/R analyst	$19.99	15 minutes	110,010	$549,775

   b. VA's cost of $3,850 for printing 110,010 forms ($35 per 1,000 forms).

   c. Mailing costs are estimated to be $2,134 yearly. VA has the printing contractor place 100 forms in a standard pack. VA mails these packets (approximate weight one pound) to schools. The cost of each mailing is approximately $1.94. (Rounding down the 110,010 forms to 110,000 and dividing by 100 forms in one packet gives 1,100 packets. Multiplying 1,100 packets by $1.94 gives this $2,134 mailing figure.)

   Summary of cost to the Federal Government:

$549,775	Processing Cost
$ 3,850	Printing
$ 2,134	Mailing
$555,759	TOTAL

15. There is no change in burden hours.

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

17. The collection instrument, VA Form 22-8690, may be reproduced and/or stocked by the work-study supervisors. This VA form does not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of this form. As this form 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 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 22-8690.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

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