

**SUPPORTING STATEMENT FOR VA FORM 22-0830
AGREEMENT FOR RELEASE OF VA EDUCATION INFORMATION TO
THIRD PARTY**

A. Justification.

1. Veterans and service members often rely on family members to call the VA on their behalf, inquiring into the status of a claim or the date a payment was processed. However, unless VA has been given written permission to divulge information to a third party on the claimant's behalf, VA cannot disclose any information to anyone other than the claimant. The Privacy Act of 1974 and the VA's confidentiality policy as outlined in 38 U.S.C., section 5701 require that individuals provide written consent before information can be disclosed to anyone other than the claimant.
2. The claimant completes this form to provide the VA with a written consent to release information regarding his or her education benefits to a specified individual. Use of the form protects an individual's privacy, consistent with the requirements of the Privacy Act of 1974 and with 38 U.S.C. 5701.
3. The data and information on this form are subject to the Privacy Act as it contains personal data and information. It requires the claimant's signature prior to the release of information. It also requires that the claimant create a password, known only to the claimant and the authorized third party individual. At the present time, electronic signatures and authentication technologies are being evaluated and tested with the Department and will be deployed when possible. Until the technology is in place, the form cannot be submitted electronically. It will be available on line to be printed, completed, signed, and forwarded to the Department.
4. VA is not aware of any duplication of this information collection.
5. The collection of information does not involve small businesses or entities.
6. This information is collected only when a claimant requests disclosure of information to a specified third party.
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 31737-31738 of the Federal Register dated June 3, 2008. No comments were received.
9. VA provides no payments or gifts to respondents.
10. This form will be retained in the claimant's electronic education file. Our 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 information collected is considered to be of a sensitive nature.

12. The estimated annual burden for the collection of the information is 11,000 hours.

a. Approximately 400,000 claimants receive education benefits, either under chapter 30, 32, 35, 1606 or 1607. VA estimated that 33% of these students will submit this form to authorize third party disclosure, or 132,000 responses. Respondents only need to submit the form only once for each person named by the claimant as the authorized third party, annual re-submission is not required. It will take respondents an average of 5 minutes to complete the form, or 11,000 hours (132,000 x 5 minutes)

b. VA estimated that it will cost the respondents \$165,000.00, based on 11,000 burden hours at \$15.00.

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

14. The annual cost to the government for administering this form is estimated at \$389,800.00. This cost is calculated as follows:

a. Administrative costs (design and printing the form) are estimated to be \$280.50 (33,000 at 8.50 per 1,000). VA estimate that almost all claimants will download this form, complete it, sign it and submit to the VA. One-fourth of the claimants will request VA to send this form to them to complete, or 33,000 forms

b. It would take a program clerk (GS 5, step 5, earning \$14.26 per hour) 5 minutes to scan this form into a claimant's electronic file, for a total of \$156,860.00.

c. Most forms will be printed on line by the claimant and mailed to the VA. For calculation purposes, however, if the VA mails one-quarter of these forms (or 33,000 forms) to the claimant, the cost to the government to mail these forms is \$13,860.00.

15. This is a new program change. The burden hours associated with this collection are new.

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

17. 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. VA also seeks to minimize the cost to itself of collection, 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 this form.

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 does not employ statistical methods.