

**SUPPORTING STATEMENT FOR RENEWAL SUBMISSION OF  
ACCELERATED PAYMENT VERIFICATION OF COMPLETION LETTER**  
(Formerly Request for Accelerated Payment, Certification Required from  
Individuals Electing Accelerated Payments, and Agreement with Educational  
Institutions)  
**(OMB 2900-0636)**

**A. Justification**

1. The Department of Veterans Affairs (VA) is authorized to pay accelerated education benefits to veterans and persons on active duty pursuing approved programs of education under title 38 U.S.C. chapter 30 and title 10 U.S.C. chapters 1606 and 1607. Public Law 107-103 authorized the accelerated payment option under 38 U.S.C. chapter 30 effective October 1, 2002. Public Law 110-181 authorizes the accelerated payment option under 10 U.S.C. chapters 1606 and 1607 effective October 1, 2008. Section 3014A of title 38, and sections 16131a and 16162a of title 10 provide that the Secretary must prescribe regulations including the requirements for the request, certification of receipt, and use of an accelerated payment under these education programs.

Title 38, Code of Federal Regulations, section 21.7154(d)(1) provides the rules for certification and use of the accelerated payment option under 38 U.S.C. chapter 30. Title 10, United States code, sections 16131a(f) and 16162a(f), provide the rules for certification and use of the accelerated payment option under chapters 1606 and 1607, respectively. Furthermore, those sections authorize VA to use existing codified regulations for the accelerated payment option under chapter 30 to administer that option under chapters 1606 and 1607. The Accelerated Payment Verification of Completion Letter is used to obtain the certification and use of payment in accordance with the aforementioned statutes

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3014A
  - b. 38 Code of Federal Regulations 21.7154(d)(1)
  - c. 10 U.S.C. 16131a and 16162a
2. VA uses this certification information to implement the regulations regarding receipt and use of the accelerated payment.
3. Information technology is not being used to reduce the burden. VA considers this information collection as being too small to warrant the cost of developing an electronic collection. The request for accelerated payment may be electronically submitted and collected on VA Form 22-1999, (OMB number 2900-0073).
4. VA is not aware of any duplication of this information collection.

5. Chapter 30, 1606, and 1607 claimants are the only sources for this information. The information collection does not have any impact on small businesses or other small entities.
6. VA would not be able to administer the certification provision of accelerated payment set by law and regulation without this collection.
7. Generally, an individual will not request more than one accelerated payment per term. However, some training programs offer short duration high cost courses that last anywhere from a week to several weeks. If an individual enrolls in several short duration courses during a term, it is possible he or she will request more than one accelerated payment. In those instances, we would obtain more than one certification per term.
8. The Department notice was published in the Federal Register on September 23, 2008, page 54898. No comments were received in response to this notice.
9. VA does not provide any payment or gifts to respondents.
10. After processing, the claimant's information is retained in his or her education record. VA periodically destroys these records. If a claimant's education record is destroyed, all documents contained in that record are also destroyed. The assurance of confidentiality is covered by VA System of Record, Compensation, Pension, Education and Vocational Rehabilitation Records - VA (58VA21/22/28), that is contained in the Privacy Act Issuances, 2001 Compilation.
11. No information is considered to be of a sensitive nature.
12. The total estimated annual burden to the public for this information collection is 150 hours for 1,199 respondents submitting 1,798 responses.

The number of respondents and burden hours is determined as follows:

#### Certifications Required from Individuals Receiving Accelerated Payments

We projected the number of accelerated payments that VA will make in future years by using the data from the FY 2009 Presidential Budget Submission. We believe that each claimant will use an average of 1.5 accelerated payments per year. Therefore, we estimate that 1,199 respondents will request 1,798 accelerated payments annually with each requiring the certification letter.

Accelerated Payment Verification of Completion Letters: The law requires respondents to furnish any increase or decrease in hours of pursuit, whether or

not the course was successfully completed, and an explanation of how the accelerated payment was used. VA estimates that a respondent would need approximately 5 minutes to complete this letter. Based on a cost of \$15.00 per hour, for 150 hours, the cost to the public in burden hours will be \$2,248.00.

13. This submission does not involve any recordkeeping costs.

14. VA estimates that the total annual cost to the government for administering this collection of information is \$22,800.00 annually.

Request for Certifications Mailed to Respondents:

We estimate burden hours for initial request of the certification to be 300. This is based on an estimated processing time of 10 minutes per request. When these requests are processed by a GS 9/5 employee using an hourly wage of \$24.46, the burden cost based on hours is \$7,330.00. We estimate the mailing costs to be \$809.00 (based on \$.42 postage, \$.03 for the envelope) per 1,798 applications for accelerated payment programs.

Certifications Completed by Respondents and Processed by VA:

We estimate burden hours for processing the certification completion responses to be 599. This is based on an estimated processing time of 20 minutes per request. When these responses are processed by a GS 9/5 employee using an hourly wage of \$24.46, the burden cost based on hours is \$14,661.00.

Summary of cost to the Federal Government:

\$ 7,330.00	Cost to Prepare Request for Completion Letter
\$ 14,661.00	Review of Response to Course Completion Letter
\$ 809.00	Mailing Cost
\$ 22,800.00	TOTAL

15. This submission reflects a decrease in burden to the public due to an error in calculation for the number of previous responses and burden hours. The addition of Public Law 110-181, which makes chapter 1606 and 1607 participants eligible for the accelerated payment option, actually provides an increase, but is not reflected due to this previous error.

16. The information collected is not for publication or tabulation use.

17. The data collection instrument, the Accelerated Payment Verification of Completion letter, is generated from our data processing center. It can take months to update such letters. This letter currently does not display an expiration date. If required to do so, it could create an administrative burden on VA. As this information collection is submitted to OMB for approval every three

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years, this date requirement would delay agency action on the benefit being sought. VA therefore continues to seek an exemption that waives the displaying of the expiration date.

18. This information collection fully complies with the requirements of 5 CFR 1320.8(b)(3).