

SUPPORTING STATEMENT FOR VA FORM 22-0803
OMB NUMBER 2900-0695

A. Justification.

1. Statute requires that an individual who desires a benefit the Department of Veterans Affairs (VA) administers must apply to VA for that benefit (38 U.S.C. 5101(a)). The collection of information is necessary to apply 38 U.S.C. 5101(a) and 38 U.S.C. 3689 (which is applicable pursuant to 38 U.S.C. 3034(a), 3241(a), 3323, 3471, and 3513) to claims for educational assistance for licensing or certification tests under the various educational assistance programs VA administers.

This submission represents a revision of an existing collection. Due to the enactment of Title V of Public Law 110-252, it is necessary to provide individuals eligible for chapter 33 the ability to apply for reimbursement of licensing or certification test fees.

2. VA will use the information collection specific to licensing or certification test reimbursement to decide whether the claimant should be paid educational assistance for taking a licensing or certification test and the amount the claimant should be paid.

3. Although this form is available electronically, it is not currently available in a fillable format. VA is working to provide a system that will allow individuals to file all claims electronically. This information collection is being considered, but due to the small amount of information collected and the small number of reimbursements sought compared to other benefits, this collection has a lower priority than other collections.

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

5. The collection of information will not have a significant impact on a substantial number of small entities. Only individuals will supply this information.

6. If VA does not collect this information, we will not be able to determine who is eligible for reimbursement of licensing or certification test fees or the amount that should be paid to those who are eligible.

7. The collection of this information does not require any special circumstances.

8. A notice regarding this information collection was published on page 66691 of the Federal Register dated November 10, 2008. No comments were received.

9. VA does not provide any gifts to respondents.

10. After processing, VA will retain all documents in an education folder. Education folders are destroyed periodically. If the education folder is destroyed, the documents on which the information is collected will be destroyed also. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation Records – VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2005 Compilation.

11. None of the information collected is of a sensitive nature.

12. The estimated annual burden is 1,000 hours. The annualized cost to respondents is \$1,500. This estimate is determined as follows:

a. The average number of individuals who applied for and received this benefit from FY 2005 to FY 2007 was 3,648. Allowing for those who apply but are not eligible and those who take more than one test, VA believes it should receive approximately 4,000 claims annually. VA estimates that it would take .25 hours to apply for this benefit. $4,000 \times .25 = 1,000$ hours \times \$15.

13. This information collection does not involve any record keeping costs.

14. VA estimates that the total annualized cost to the government to collect the information is \$32,287 based on 4,000 responses annually. This cost is computed as follows.

a. The processing cost of \$36,287.20 is based on an estimate that a GS 9/5 employee will have to review each application. We estimate that it will take 20 minutes to review 4,000 claims. $4,000 \times 20/60 = \$36,493$.

b. There are no administrative costs associated with forms for this information collection because the Code of Federal Regulations does not require the use of a VA Form.

15. VA does not anticipate that there will be an increase in the reporting burden due to the enactment of the Post-9/11 GI Bill because the majority of eligible individuals seeking reimbursement are eligible under another benefit. In addition, individuals applying for reimbursement under the Post-9/11 GI Bill are only eligible for reimbursement of only one test. The change in burden is due to a decrease in the number of participants.

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

17. The collection instrument, VA Form 22-0803, may be reproduced and/or stocked by individuals and educational institutions. 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 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 22-0803.

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

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.