

SUPPORTING STATEMENT FOR VA FORM 22-1999b
Notice of Change in Student Status
(2900-0156)

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans, persons on active duty, reservists, and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35 of title 38, United States Code; chapters 1606 and 1607 of title 10, U.S.C.; sections 901 and 903 of Public Law 96-342; the National Call to Service Provision of Public Law 107-314; and the "Transfer of Entitlement" Provisions of Public Laws 107-107 and 110-252. Benefits are not payable when pursuit of a program is interrupted or terminated, or is not completed according to the regularly established policies and regulations of the educational institutions. Educational institutions are required to report without delay to VA, in the form prescribed by VA, the interruption or termination, or a finding of unsatisfactory attendance, progress, or conduct. VA Form 22-1999b serves as this report to VA of such changes in enrollment status.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3020, 3034(a), 3241, 3323(a), 3474, 3524, 3680(a), 3684(a);
10 U.S.C. 510, 16136(b), and 16166(b).
- b. 38 Code of Federal Regulations 21.4203, 21.5200(d), 21.5292(e)(2), 21.5812,
21.7156, and 21.7656.

2. VA uses the information collected to determine whether the eligible person's educational benefits should be increased, decreased, or terminated, and the effective date of the change, if applicable. Without this information, VA might underpay or overpay benefits.

3. Information technology is being used to reduce the burden. Approximately seventy-five percent of current reports are filed electronically. The electronic version, known as VA-ONCE (VA Online Certification of Enrollment), collects the same information that the printed VA Form 22-1999b does. VA-ONCE allows officials at educational institutions to use personal computers to submit certifications through a web-based application directly to the regional office that is responsible for processing the educational benefit claims for students in their assigned geographical areas. This direct submission saves the educational institutions time and costs. It eliminates delays, possible loss of information encountered when mailing paper documents, and the expense of mailing the documents.

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

5. Educational institutions providing training are the only sources for this information. The change in this information collection will not have a significant impact on a substantial number of small entities and the existing burden cannot be reduced for these entities. The information

must be provided in a uniform, consistent fashion regardless of the size of the educational institution for those students who have changes in their enrollments.

6. If this information is not collected, eligible persons may be underpaid or overpaid. If the information is collected less frequently, it would impair VA's ability to prevent overpayments and under-payments of educational benefits.

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

8. The Department notice for public comments was published in the Federal Register on November 12, 2008, page 66960. There were no comments received in response to this notice.

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

10. VA Form 22-1999b is retained permanently in the claimant's electronic education folder. Education records are destroyed periodically. If the claimant's electronic folder is destroyed, the document image on which the information is collected will also be destroyed. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation Records – VA (58VA21/22/28), that 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 total estimated annual burden for this information collection is 51,667 hours with submissions by approximately 8,500 respondents (schools). There is no estimated annual cost to the public as costs incurred, estimated to be \$820,005, are offset by school reporting fees paid by VA. VA calculated the annual number of respondents, burden hours, and costs as follows:

VA received an average of 364,395 responses annually with submissions from approximately 8,442 schools from FY 2005 through FY 2007. Seventy-five percent of responses were filed electronically and twenty-five percent of responses were completed using the paper form. VA estimates that it will receive approximately 400,000 responses annually with submissions from approximately 8,500 schools over the next three years. VA estimates that it takes approximately 7 minutes to complete the electronic form and 10 minutes to complete the paper form.

Electronic submissions account for 75 percent of total responses received. Based on an estimated receipt of 400,000 responses, VA expects that 300,000 of those responses will be filed electronically. The total annual burden for electronic responses is 35,000 hours. The total annual burden for 100,000 paper submissions is estimated to be 16,667 hours. The total annual burden to the public for both electronic and paper submissions is 51,667 hours.

The annual cost to schools that submit responses electronically is estimated to be \$525,000 based 35,000 hours at \$15 an hour. The annual costs to schools that submit responses using the paper form are estimated to \$250,005 based on 16,667 hours at \$15 an hour.

The total annual cost to the public of \$775,005 is offset by school reporting fees paid by VA. VA pays each school that furnishes training under various education programs a fee for processing all required VA reports or certifications for each trainee. These fees help defray the costs of processing paperwork and are provided in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967 and are codified in 38 U.S.C. 3684. As a result, there is no additional cost to the public for this information collection.

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

14. The estimated cost to the Federal government is \$1,350,937. VA calculated this amount as follows:

All paper submissions received must be scanned and indexed into an electronic file system. These actions are completed by a GS-4, step 5 clerk in approximately 10 seconds per form costing \$4,012 (278 hours x \$14.43 per hour). The indexed document is then sent to a GS-9, step 5 claims examiner who completes processing of the form in approximately 10 minutes per form costing \$407,675 (16,667 hours x 24.46 per hour). The total annual government cost for processing 100,000 paper forms is \$411,687.

Approximately 25 percent of electronic submissions are completely processed by the Electronic Certification Automatic Processing (ECAP) system and require no human intervention. Seventy-five percent of electronic submissions (225,000) must be forwarded to a GS-9, step 5 claims examiner for processing which takes approximately 10 minutes per form costing \$917,250.

The total annual processing cost to the government for this collection is \$ 1,328,937. The administrative costs are \$22,000. This is the total for development, design, printing, postage, and distribution of 100,000 forms at 22 cents per form.

The total cost to the government is \$1,350,937 annually.

15. This submission reflects an increase in the annual burden to the government. This increase is due to the increase in the number of educational assistance programs available (Post-9/11 GI Bill program established June 30, 2008) and the increase in the number of individuals pursuing training.

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

17. The collection instrument, VA Form 22-1999b, may be reproduced and/or stocked by officials at educational institutions. VA does not display an expiration date on this form. The

form is submitted to OMB every three years for approval. Revising and reprinting the form to show an expiration date would result in a costly waste of existing stock and would delay department action on the benefit being sought. By requesting an exemption from displaying the expiration date, VA can minimize the cost to itself of collecting, processing, and using the form. VA seeks a continued exemption from displaying the expiration date on VA Form 22-1999b.

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.