

**SUPPORTING STATEMENT FOR VA FORMS 22-8691,  
22-8692, 22-8692a, and 22-8692b [Work-Study]  
(OMB 2900-0209)**

**A. Justification.**

1. The Department of Veterans Affairs (VA) is authorized to pay work-study benefits to veterans and other eligible individuals who are receiving educational assistance under chapters 30, 31, 32, 33, and 35 of title 38, U.S.C.; chapters 1606 and 1607 of title 10, U.S.C.; section 903 of Public Law 96-342; and the National Call to Service Provision of Public Law 107-314.

In order to receive work-study benefits, eligible individuals must complete VA Form 22-8691, Application for Work-Study Allowance. The eligible individual then enters into an agreement with VA in which he or she agrees to work a specified number of hours. If the individual wants a payment of work-study allowance in advance of working those hours, VA Form 22-8692, Student Work-Study Agreement (Advance Payment), is used. If the individual does not want an advance payment of the work-study allowance, VA Form 22-8682b, Student Work-Study Agreement, is used. If the individual wants to extend the work-study contract, VA Form 22-8692a, Extended Student Work-Study Agreement, is used.

VA is updating these information collections and revising the forms to include an additional educational assistance program, chapter 33 of title 38, U.S.C., enacted by Public Law 110-252, which authorized the Post-9/11 GI Bill for individuals who serve on active duty after September 10, 2001.

Section 3485 of title 38, United States Code, and section 21.4145 of title 38, Code of Federal Regulations, necessitate these collections of information.

2. VA uses the information collected to determine the individual's eligibility for the work-study allowance, the number of hours the individual will work, the amount payable, whether the individual desires an advance payment, and whether the individual wants to extend the work-study contract.
3. Work-Study applicants complete these forms and return them to a VA Regional Processing Office for processing. These forms are available in an electronically fillable format on VA's website. At this time, information technology cannot be used to further reduce the burden of this information collection. Except for the application form, these forms go back and forth between VA and the claimant before the contract is finalized. This method of collecting the information is the most efficient and causes the least burden on the public. Further automation of these submissions is not practical due to the low frequency of the information collection and the complexity of developing a system for the full electronic submission of this information collection.

4. VA is not aware of any duplication of this information collection.
5. The information collection only affects individual claimants. There is no impact on educational institutions or small businesses.
6. If this information were not collected or collected less often, VA could not pay work-study benefits. There are no technical or legal obstacles to prohibit reduction of the collection burden.
7. The collection of information does not require any special circumstances.
8. The public was informed of the right to submit comments on this information collection. The Federal Register notice was published on November 19, 2008, page 69720. No comments were received in response to this notice.
9. VA does not provide any payment or gift to respondents.
10. These forms are retained permanently in the claimant's work-study folder. The assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education, and Vocational Rehabilitation Records — VA (58VA21/22/28) contained in the Privacy Act Issuances, 2005 Compilation.
11. None of the information collected is considered to be of a sensitive nature.
12. The annual burden estimate for these collections of information is 5,592 hours. The estimated number of responses for Fiscal Years (FY) 2009 through 2011 is based on an annual average of the number of applications, contracts, and extensions processed during FY 2006, 2007, and 2008.

We calculated the average of the total number of responses received in each category (applications, contracts, and extensions) for FY 2006, 2007, and 2008 as shown below:

	APPLICATIONS (VA 22-8691)		CONTRACTS APPROVED (VA 22-8692 & 22-8692b)	CONTRACTS EXTENDED (VA 22-8692a)
	APPROVED	DENIED		
FY 06	16,139	2,513	15,778	390
FY 07	13,927	2,254	13,289	628
FY 08	14,805	2,537	14,521	403
TOTAL	44,871	7,304	43,588	1,421
AVERAGE	14,957	2,435	14,529	474

These respective averages (17,392 applications; 14,529 contracts; 474 extensions) were rounded up to the nearest hundred, then used to project the number of applications, extensions, and contracts that would be completed annually for FY 2009 through 2011. Using these figures (17,400 applications; 14,600 contracts; and 500 extensions), we project the estimated annual hour burden for claimants in FY 2009, 2010, and 2011 will be as follows:

FORM	TIME (Minutes)	# of Forms	HOURS
VA Form 22-8691 (approved & denied)	15	17,400	4,350
VA Form 22-8692 & 22-8692b	5	14,600	1,217
VA Form 22-8692a	3	500	25
	TOTAL	32,500 Forms	5,592 Hours

Based on a cost of \$15.00 per hour (includes mailing costs) for 5,592 hours, the cost to the public is estimated to be \$83,880 annually.

13. This submission does not involve any recordkeeping costs.

14. The estimated total cost to the Federal government for processing these information collections is \$103,941. VA calculated this amount as follows:

The VA Regional Processing Office has a GS 6 (step 5) process these information collections. Based on the current hourly pay for this employee of \$16.36 per hour for 5,376 hours, the cost for processing these forms is \$87,951.

FORM	TIME (Minutes)	# of Forms	HOURS
VA Form 22-8691	10	17,400	2,900
VA Form 22-8692 & 22-8692b	10	14,600	2,434
VA Form 22-8692a	5	500	42
	TOTAL	32,500 Forms	5,376 Hours

VA Forms 22-8692, 22-8692a, and 22-8692b will no longer be sent for printing. VA completes these agreement forms using the automated Work-Study Management System. Copies of the completed forms are only printed from the Work-Study Management System as needed.

VA Form 22-8691 is available in an electronically fillable format at VA's website. We estimate 75 percent of claimants obtain this form on-line. VA's annual cost for printing the 5,000 application forms (approximately 25 percent of the total number used) needed for distribution is \$150 (\$30 per 1,000 forms).

Mailing costs are estimated to be \$15,840 per year. VA mails 5,000 copies of VA Form 22-8691 to schools and potential work-study sites. VA mails approximately 15,100 contracts or extensions (VA Form 22-8692, 22-8692a, or 22-8692b) to individual applicants for their signature. After VA finalizes and signs the contract, a copy of the final contract or extension (approximately 15,100) is mailed to the applicant. The maximum number of mailings would be 35,200 at \$0.45 per form (\$0.42 for postage and \$0.03 per envelope) for a total of \$15,840.

15. The decrease in the public burden hours to the current estimate of 5,592 hours (for 32,500 responses) reflects the annual projected number of applications, contracts, and extensions for FY 2009 through 2011 based on the actual number of these forms submitted for FY 2006, 2007, and 2008, as provided by the Regional Processing Offices.
16. VA does not publish this information or make it available for publication.
17. The collection instruments, VA Forms 22-8691, 22-8692, 22-8692a, and 22-8692b, may be reproduced and/or stocked. These forms do not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of the forms. As these forms are submitted to OMB for approval every three 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 Forms 22-8691, 22-8692, 22-8692a, and 22-8692b.
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.