

SUPPORTING STATEMENT FOR VA ENROLLMENT CERTIFICATION, VA Form 22-1999
OMB Number 2900-0073

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C., section 510 and chapters 1606 and 1607, title 10, U.S.C., and sections 901 and 903 of Public Law 96-342. Educational institutions and training establishments are required to report without delay, in the form prescribed by VA, information concerning the enrollment or reenrollment into training of veterans, service persons, reservists, and other eligible persons. In certain cases, VA is authorized to make payments in advance if the trainee requests an advance payment. In these cases, the VA Enrollment Certification (VA Form 22-1999) serves as the trainee's request for an advance payment as well as the educational institution's report of the trainee's enrollment. In certain instances, VA is authorized to make a lump sum payment of up to 60% of a claimant's tuition and fees if the trainee requests an accelerated payment. In these cases, VA Form 22-1999 serves as the trainee's request for an accelerated payment as well as the educational institution's report of the trainee's enrollment.

The following administrative and legal requirements necessitate the collection:

- A. 38 U.S.C. 3034, 3241, 3323, 3680; and 3684, 10 U.S.C. 16136, and 16166
 - B. 38 CFR 21.4203, 21.5200(d), 21.7152, and 21.7652
2. VA uses the information collected on VA Form 22-1999 to determine the amount of educational benefits payable to the trainee during the period of enrollment or training. Additionally, VA also uses these forms to determine whether the trainee has requested an advance payment or accelerated payment of benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting an advance or accelerated payment.
3. Information technology is being used to reduce the burden. VA allows schools to submit the information via a paper form or using VA Online Certification of Enrollment (VA-Once). VA estimates that 70 percent of all enrollment certifications are received electronically via VA-Once.
4. VA is not aware of any duplication of this information collection.
5. The educational institutions and job training establishments providing training are the only sources for this information. The information collection burden cannot be reduced for small educational institutions or job training establishments. The printed form or the electronic version must be submitted for any student receiving VA educational benefits because of school attendance or training. The information provided must be uniform and consistent regardless of the size of the educational institution or job training establishment.

6. VA would not be able to pay benefits for training if this information were not collected.
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 page 76101 of the Federal Register dated December 15, 2008. No comments were received in response to this notice.
9. VA does not provide any payments or gifts to respondents.
10. VA Form 22-1999 is retained permanently in the trainee's education file. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation Records – VA (58VA21/22/28) which are contained in the Privacy Act Issuances, 2005 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 160,117 hours. There is no estimated annual cost to the public as costs incurred, estimated to be \$2,401,755, are offset by school reporting fees paid by VA. VA calculated the annual number of respondents, burden hours, and costs as follows:

VA received responses from approximately 8,442 schools from FY 2005 through FY 2007. VA estimates that it will receive responses from approximately 8,500 schools over the next three years. Historically, VA has received an average of 2 enrollment certifications (responses) for each trainee each year. Based on the fiscal year (FY) 2009 Presidential Budget Submission, VA estimates that an average of 558,548 students will train each year from FY 2008 through FY 2010 resulting in approximately 1,117,096 responses each year.

VA estimates that electronic submissions account for 70 percent of total responses received. Based on an estimated receipt of 1,117,096 responses, VA expects that 781,967 of those responses will be filed electronically. The total annual burden for electronic responses is 104,262 hours. The total annual burden for 335,129 paper submissions is estimated to be 55,855 hours. The total annual burden to the public for both electronic and paper submissions is 160,117 hours.

We estimate that it will take respondents an average of 8 minutes to complete electronic submissions and 10 minutes to complete paper submissions. These estimates are unchanged from our last submission.

The annual cost to schools that submit responses electronically is estimated to be \$1,563,930 based on 104,262 hours at \$15 an hour. The annual costs to schools that submit responses using the paper form are estimated to \$837,825 based on 55,855 hours at \$15 an hour.

The total annual cost to the public of \$2,401,755 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 annual cost to the government for administering this form is estimated at \$7,514,146 based on the following:

a. Processing Costs

22-1999 Processor	Hourly wage	Processing Time	Total 1999s (1,117,096)	Total Cost
GS 9, step 5 claim examiner	\$24.46	20 minutes	335,129 (paper)	\$2,732,418
GS 9, step 5 claim examiner	\$24.46	15 minutes	781,967 (electronic)	\$4,781,728

b. Administrative Costs: VA estimates an administrative cost of \$16,756. This is based on a cost of \$.50 for the development, design, printing and distribution of 335,129 forms.

15. The change in the annual reporting burden is due to the overall increase in the number of claimants training.

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

17. The collection instrument, VA Form 22-1999, may be reproduced and/or stocked by the 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 three years, this date requirement would also result in an unnecessary burden on the educational institutions and would delay VA action on the adjustment or termination of education benefits. 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 continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-1999.

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.