

SUPPORTING STATEMENT FOR VA FORM 22-8979
OMB NUMBER 2900-0465

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay education benefits to veterans and other eligible persons pursuing approved programs of education under chapters 30, 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 NCS (National Call to Service) (10 U.S.C., chapter 31, section 510).

Section 3680(g) of title 38, U.S.C., states that VA may require proof of continued enrollment. VA Form 22-8979 and the electronic versions of this form are used as this proof. This collection obtains verification of the student's continued enrollment prior to releasing payments. This collection of information is for both college and non-college degree programs.

The overall average burden per verification continues to be approximately 1 minute per response.

2. VA uses the information requested by this collection to determine the individual's continued entitlement to benefits. The collection of this information is essential for the administration of these programs. The student is required to submit the verification on a monthly basis to allow for a frequent, periodic release of payment. Without this information, VA could not pay some benefits based on proof of attendance and/or change in enrollment.

3. Information technology is being used to collect the information provided on this form. Individuals receiving benefits under chapter 33 do not have to verify their attendance. Chapters 30, 1606, and 1607 respondents must submit this information electronically using either the automated telephone system or the Internet. If the information is provided via the toll-free automated telephone number, it is collected using Interactive Voice Response technology (IVR). If the information is provided via the Internet, it is collected via the Web Automated Verification of Enrollment (WAVE).

Only respondents receiving education benefits under chapters 32 or 35, or section 903, who are enrolled in non-college degree programs receive the paper form. Currently, VA extracts claimant information electronically from education data resources and places it into the appropriate blocks of VA Form 22-8979. VA then sends the printed form to chapters 32 and 35, as well as section 903, respondents during computer generated monthly mailings. In FY2008, less than 3% of these individuals in non-college degree programs received the paper form; however, the majority of individuals enrolled in non-college degree programs verify their attendance using the toll-free customer service number (1-888-451-4551) instead of returning the form. The number of respondents who complete and return the paper form is insignificant.

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

5. The information collection does not involve small businesses or other small entities.

6. Collection of this information on a monthly basis will prevent overpayment of benefits due to late reporting, since payment will not be made until the report of attendance for this benefit has been returned to VA and processed. To collect information less often would preclude VA from making monthly payments under existing regulations.

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 52843 of the Federal Register dated October 14, 2009. No comments were received.

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

10. If changes in enrollment status are reported on the printed version of this form, the form is retained in the respondent's folder. After processing of the different electronic versions of this form, the data is retained electronically for 2 years. Then, these electronic transactions are destroyed.

Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) which are contained in the Privacy Act Issuances, 2001 Compilation.

11. None of the questions on this form are considered to be of a sensitive nature.

12. The estimated annual burden for the collection of information is 17,024 hours for 1,021,416 responses submitted by 255,354 respondents.

The projected number of students who will receive educational benefits and verify their attendance for Fiscal Years 2010, 2011, and 2012 will be 262,197, 255,083, and 248781, respectively. VA estimates the number of annual responses will be 255,354 per year and that each respondent will average approximately 1 minute to submit a response through WAVE and IVR. We estimate that each respondent will certify an average of 4 times per year. Based on this response rate, each respondent would spend 4 minutes per year certifying for classes. VA expects to receive 1,021,416 certifications per year from approximately 255,354 respondents for a total of 17,024 hours per year. $(255,354 \text{ respondents} \times 4 = 1,021,416 \text{ responses} \times 1 \text{ minute}/60 \text{ minutes} = 17,024 \text{ total burden hours}$

The annual cost to the public is \$255,360, based on 17,024 burden hours times \$15.00.

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

14. The estimated annual cost to the Federal Government is \$101,363 based on 1,021,416 responses and the cost of maintenance for electronically accessible systems.

The following is the annual cost for submissions returned on VA Form 22-8979:

The IVR (toll-free telephone) system is expected to incur a maintenance cost of \$20,510 for FY2010. While the number of certifications is expected to decrease, VA anticipates that the annual maintenance cost will be approximately the same amount for future years because the age of the system will require more updates. After receiving the information, VA simply moves the electronic information from one data file to another data file.

The WAVE (the Internet system) system incurred a maintenance cost of \$18,300 in previous fiscal years when maintenance was done by a contractor. In 2008, VA's IT staff rewrote the WAVE program and it no longer requires vendor support. Philadelphia IT Center estimates the annual cost of maintaining WAVE as \$15,325 (.2 FTE – GS12/5). While the number of certifications is expected to decrease, VA anticipates that the annual maintenance cost will be approximately the same amount for future years.

Based on our last submission, a little over 1% of the responses received will report changes in enrollment. No processing is required by a claims examiner if no change in enrollment is reported by the respondent. Changes in enrollment are processed by a claims examiner (GS9/5 with hourly rate of \$25.32 per hour). These changes in enrollment equal a total of 10,214 responses.

We estimate that 60% of these responses will be decreases in enrollment which require a longer processing time of 20 minutes. This will equal a total of 6,128 responses.
(6,128 responses X 20 minutes = 122,560 minutes/60 minutes = 2,043 processing hours.)

We estimate that 40% of these responses will be increases in enrollment which require a processing time of 8 minutes. This will equal a total of 4,086 responses.
(4,086 responses X 8 minutes = 32,688 minutes/60 minutes = 545 processing hours.)

This is a total processing time for the GS9/5 of 2,588 hours at an hourly rate of \$25.32 resulting in a cost to the government of \$65,528.

Summary of cost to the Federal Government:

\$ 20,510.00	Toll Free Telephone Maintenance (IVR)
\$ 15,325.00	Internet Maintenance (WAVE)
\$ 000.00	No Change Internet Certifications
\$ 65,528.00	Change in Certifications requiring GS9/5 (decreased or increased enrollment)
\$ 101,363.00	TOTAL

15. The decrease in the burden (-28,709 hours) is due to legislation that was passed (Public Law 110-252) that added a new benefit program (chapter 33) to the existing benefit programs. A large percentage of claimants eligible under chapter 30 or chapter 1607 will relinquish their eligibility in order to be eligible under the chapter 33 benefit program. Since chapter 33 does not require monthly verification, the public burden will decrease.

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

17. The VA Form 22-8979 information collection doesn't display an expiration date. If VA were required to do so, it would result in unnecessary time and expense for programming the new date on both versions. As this information collection is submitted to OMB for approval every three years (as required by OMB), this date requirement would also result in an unnecessary burden on the respondents and would delay VA 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 these reasons, VA continues to seek an exemption that waives the displaying of the expiration date both on the paper version of VA form 22-8979 and the electronic versions of this information collection.

18. The information collection complies with all requirements of 5 CFR 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.