

SUPPORTING STATEMENT FOR VA FORM LETTER 22-315
OMB NUMBER 2900-0118

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay education benefits to individuals pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C.; chapters 1606 and 1607 of title 10, U.S.C.; Section 903 of Public Law 96-342; and the NCS (National Call to Service) (10 U.S.C., chapter 31, section 510). This information collection is necessary when a student is receiving Department of Veterans Affairs (VA) education benefits while enrolled at two training institutions at the same time. The institution at which the student pursues his approved program of education must verify that courses pursued at a second or supplemental institution will be accepted as full credit toward the student's course objective. Educational payment for courses pursued at the second institution is not payable unless evidence is received to verify that the student is pursuing his or her approved program while enrolled in these courses. VA Form Letter 22-315 serves as this certification of acceptance of credit.

VA Form Letter 22-315 is sent to the student by a VA claims examiner in cases where this information is not already established or included in the applicant's file. The letter directs the student to have the certifying official of the primary institution complete the information on the reverse side of the form. The certifying official at the primary institution uses the letter to list the course or courses pursued at the secondary institution for which the primary institution will give full credit. Copies of the letter are sent to both the primary and secondary institutions. The certifying official at the primary institution sends the completed letter to the VA regional office. The certifying official may also send the information electronically using the VA-ONCE system. The claims examiner then determines whether education benefits can be authorized for these courses based on this information. Without this information, benefits cannot be authorized for any courses pursued at any institution other than the primary institution.

The following administrative and legal requirements necessitate the collection:

A. 38 U.S.C. 3002(3), 3014, 3202(2), 3231(a)(3), 3301(3), 3452(b), 3501(a)(5), 3531(a); 10 U.S.C. 16136(b), 16161, 16166(b), and section 510 of chapter 31

B. 38 CFR 21.4233(b), 21.5070, 21.5131, 21.7070, 21.7630, 21.9620

2. VA has used information from the current collection to ensure that claimants are pursuing their approved program while enrolled at a supplemental school. Without this information, VA might underpay or overpay benefits.

3. Information technology is being used to reduce this burden. We estimate that 80% of this information will be delivered through the VA-ONCE system. VA-ONCE is the electronic information system currently being used by education institutions to report education activity at the education facility.

4. VA is not aware of any duplication of this information collection.
5. The information collection does not have a significant impact on a substantial number of small schools. It cannot be reduced for small enrollment schools as the information collected is required by statute. The form must be submitted for any student receiving VA educational benefits who pursues a course at a school other than the school from which he or she plans to receive an approved degree. The information to be provided must be uniform and consistent regardless of the size of the school. This form letter requires minimal input from school officials. The school or training institution is required to complete only three items (course designation and title, signature and title of certifying official, and date) on the Form Letter 22-315.
6. If this information is not collected or is collected less often, VA might underpay or overpay benefits. There are no technical or legal obstacles to reducing the burden.
7. No special circumstances apply.
8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 58374 - 58375 of the Federal Register dated November 12, 2009. No comments were received.
9. VA does not provide any payment or gift to respondents.
10. If the school responds, the information provided is retained permanently in the student's education folder. Our assurance of confidentiality is covered by 38 U.S.C. 5701 and our VA System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2007 Compilation.
11. None of the information collected is considered to be of a sensitive nature.
12. The estimated annual burden for the collection of this information is 1,436 hours.

This figure represents the number of annual responses of 8,616. We project that a respondent will only submit one of these forms per year and should require approximately 10 minutes to research and supply the required information.

The annual gross cost to the public is \$21,541 based on 8,616 responses. By assigning a value of \$15.00 per hour to the time of the school officials who complete VA Form Letter 22-315, with an average completion time of 10 minutes, the cost of information collection activity is estimated to be \$21,541.
13. This submission does not involve any record keeping costs.

14. The annual cost to the government for administering these forms is estimated at \$76,859 based on 8,616 annual responses.

This cost is composed of the following:

- a. A processing cost of \$72,723. This number is based on the salary of a claims examiner (GS-9 step 5, hourly rate of \$25.32) with a processing time of 20 minutes per response.
- b. Administrative and printing costs totaling \$4,136.

15. The increase in burden is due to the increase in the number of applicants eligible under Public Law 110-252.

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

17. The collection instrument, VA Form Letter 22-315, may be reproduced and/or stocked by regional offices and training establishments. This form does not display an expiration date, and if required to do so, would result in waste of existing stocks of this form. As this form is submitted to OMB for approval every three years, the date requirement would 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 exception that waives the displaying of the expiration date on VA Form Letter 22-315.

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

B. Collection of Information Employing Statistical Methods.

This collection of information by the Veterans Benefits Administration does not employ statistical methods.