

SUPPORTING STATEMENT FOR VA FORM 22-5495
Request for Change of Program or Place of Training
Under the Survivors' and Dependents' Educational Assistance Program
(OMB Control Number 2900-0099)

A. Justification.

1. Children who are eligible for Dependent's Educational Assistance (DEA) benefits under chapter 35, title 38, U. S. Code, may not make any changes in their education program unless the new program is suitable to their abilities, aptitudes, and interests. Spouses and surviving spouses who are eligible for DEA benefits may change their education program the first time solely at their option. However, these spouses may not change their DEA education program a second (or subsequent) time unless the new program is suitable to their abilities, aptitudes, and interests. In addition to changing their education program, these claimants may also change their school (where they take training) upon application to the Department of Veterans Affairs (VA). VA Form 22-5495 serves as the procedural requirement for a DEA claimant to request a different education program or place of training.

The following administrative and legal requirements necessitate the collection:

- a. 38 United States Code 3513, 3521, and 3691
- b. 38 Code of Federal Regulations 21.4234

2. VA has used the current information collection to determine (1) if the claimant continues to qualify for education benefits when taking a different program of training and (2) to verify that a new place of training is approved for benefits. The information on the form can be obtained only from the individual claimant. VA cannot make a determination without this information.

The requested version of this form includes the following new items to improve claims processing:

- The claimant's date of birth, sex, and telephone number.
- The claimant's e-mail address.
- More information about the claimant's relation to the veteran.
- A revision to the possible types of training to include national tests for credit.
- More detailed data about the applicant's active duty service

3. Information is collected when the spouse, surviving spouse, or child of a veteran applies for a new program of education or place of training. Information technology is being used to reduce this burden.

We have converted this form into an electronic fillable format available on the Internet. Additionally, we have added this form to the VONAPP (Veterans On-Line application) system. The VONAPP version is identical to the printed form, except claimants are guided past questions that do not pertain to them. VONAPP applies information technology and reduces the burden on the public. Five percent of respondents used VONAPP in the most recent fiscal year and VA expects that percentage to increase.

These methods of obtaining the required information are the most efficient and cause the least burden on the public.

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

5. The information collection only affects eligible spouses, surviving spouses, and children of veterans. There is no impact on education institutions or small businesses.

6. This information is collected only when a spouse, surviving spouse, or child of a veteran requests DEA benefits for a change of educational program or place of training. If this information is not collected, VA would not have any basis to make eligibility determinations regarding requests for DEA benefits involving a change of program or place of training. There are no technical or legal obstacles to reducing the burden of this information collection.

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 was contained on pages April 2, 2007 Volume 72, Number 62, Page 15767 of the Federal Register. No comments have been received. Consultations outside VA have not been held since the last submission for approval. Spouses, surviving spouses, and children of veterans and school officials have a continuing opportunity to comment on this form.

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

10. VA Form 22-5495 is retained permanently in the claimant's electronic folder. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Rehabilitation Records – VA (58VA21/22), 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 estimated annual burden for the collection of this information is 12,646 hours for 38,418 responses.

Type of Submission	%	Number	Minutes Each	Hours
electronic	5%	1,921	15	480
paper	95%	36,497	20	12,166
	100%	38,418		12,646

To obtain the estimated number of annual responses, we did the following:

- a. Based on information from previous fiscal years, we have determined that approximately 44% of trainees need to complete this form (or submit the information electronically).
- b. We have estimated the number of expected DEA trainees in future years and we have estimated that 44 % of them will need to complete this form (or submit the information electronically).

FY	Projected Trainees	44% of Trainees
2007	83,235	36,623
2008	86,433	38,031
2009	88,931	39,130
2010	90,651	39,886
Total	349,250	153,670

During the next four fiscal years, we expect 349,250 trainees to apply for DEA benefits. We expect that 44% of these projected trainees will submit VA Form 22-5495. Forty four percent of 349,250 gives 153,670 respondents. The estimated annual number of respondents is 38,418 and we expect that these respondents will submit an average of one form each, for a total of 38,418 responses per year.

The annual cost to the public is \$205,825.56 based on 38,418 responses. VA calculated this amount as follows:

Submission	Number	Minutes Each	Hours	Cost (at \$15/Hr completion time)
electronic	1,921	15	480	\$ 7,200
paper	36,497	20	12,166	\$ 182,490
	38,418			\$ 189,690

- a. The cost to claimants for completing 38,418 submissions totals \$189,690.
- b. Total mailing costs are \$16,135.56. All claimants have a mailing cost. The claimants using the electronic method must submit a signature page by mail. The calculation is \$0.42 for each response (\$0.39 for first class postage stamp and \$0.03 per envelope).

Summary of Cost to the Public:

\$ 189,690.00	Completion Cost
\$ 16,135.56	Mailing Cost
\$ 205,825.56	TOTAL

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

14. The estimated annual cost to the Federal government is \$298,076. VA calculated this amount as follows:

a. The total processing cost is of \$295,179. This is based on the following:

22-5495 Processor	Hourly wage	Processing Time	Total 5495s (38,418)	Cost
GS 9, step 5 claim examiner	\$23.33	20 minutes	36,497 (paper)	\$283,825
GS 9, step 5 claim examiner	\$23.33	15.2 minutes	1,921 (electronic)	\$ 11,354
			TOTAL COST	\$295,179

b. The mailing cost of \$697. VA has the printing contractor place 100 forms in a standard pack (packet in plastic wrap). VA mails this packet (approximate weight one pound) to educational institutions. The cost of mailing one packet is approximately \$1.91. The approximate annual cost of mailing 365 of these packets totals \$697.09. We have rounded this figure down to \$697.

c. The administrative cost is \$2,200. This is the total for form development, redesign, and printing 36,497 forms.

Summary of cost to the Federal Government:

\$ 295,179	Processing Cost
\$ 697	Mailing Cost
\$ 2,200	Administrative Cost
\$ 298,076	Total

15. The public burden in hours has increased because of the following reasons:

The percentage of trainees that submit this form has increased. Previously, we had estimated that 25% of the total chapter 35 trainees would submit this form. We now estimate that 44% of the total chapter 35 trainees will submit this form.

The number of questions that respondents answer is increased. Accordingly, we have increased the time that a respondent needs to complete this information collection from 15 minutes to 20 minutes.

These adjustments account for 100% of the change in burden hours.

The following laws have some impact on the chapter 35 program but we believe the impact is less than 1% of the burden increase. Therefore, we have not requested a program change.

Section 303 of Public Law 108-183, enacted December 16, 2003, extends the ending date for use of benefits (the delimiting date) for those involuntarily ordered to full-time National Guard duty under section 502(f) of title 32, U.S.C.

Section 105 of Public Law 108-454, enacted December 10, 2004, allows surviving spouses of members who die on active duty ten additional years to use benefits.

Section 106 of Public Law 108-454, enacted December 10, 2004, allows claimants to receive reimbursement of the fee charged for national tests for admission to institutions of higher learning, including graduate schools, and national tests providing an opportunity for course credit at institutions of higher learning.

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

17. The collection instrument, VA Form 22-5495, may be reproduced and/or stocked by the respondents and veterans' services organizations. 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 22-5495.

18. This information collection fully complies with all the requirements of 5 Code of Federal Regulations 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.

ATTACHMENTS

- A. 38 United States Code 3513, 3521, and 3691
- B. 38 Code of Federal Regulations 21.4234
- C. VA Form 22-5495