

**SUPPORTING STATEMENT FOR
CERTIFICATE OF DELIVERY OF ADVANCE PAYMENT AND ENROLLMENT
(2900-0325)**

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits for veterans and to other eligible individuals pursuing approved programs of education. When certain requirements are met, VA is authorized to issue payments in advance of the beginning date of training under chapters 30, 32, 35 of title 38, U.S. Code, chapters 1606 and 1607 of title 10, U.S. Code, and section 903 of Public Law 96-342. The schools deliver advance payments to the individual and are required by law to certify to the VA that these deliveries were made. The schools are also required to report the following to VA: the failure of a student to enroll; an interruption or termination of attendance; or a finding of unsatisfactory attendance, conduct or progress.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3034, 3241, 3531, 3680(d), 3684
 - b. 10 U.S.C. 16136(b), 16166(b)
 - c. 38 C.F.R. 21.4138a, 21.4203(a) and (d), 21.5135, 21.5200(d), and 21.5292(e)(2), 21.7151(b), and 21.7640(d)
2. VA uses information from the current collection at the beginning of the school term to ensure that advance payments have been delivered and to determine whether the student has increased, reduced, or terminated training.
3. Information technology is not being used to reduce the information collection burden because VA is not currently able to accept electronic signatures and cannot require all schools to use information technology to submit this information.
4. VA is not aware of any duplication of this information collection.
5. Each educational institution that accepts advance payments on behalf of students are required by statute, regardless of the size of the institution, to submit a certification of delivery. The form must be submitted for any student that receives the advance payment. For that reason, the information collection cannot be reduced for small establishments.

6. Collecting this information is done after the school delivers the advance payment to the student. Delivery of advance payment cannot be confirmed without a completed form. The collection of information prevents an overpayment or underpayment of benefits. If the information was not collected or collected irregularly, VA would be unable to prevent erroneous payments.
7. The collection of this information does not require any special circumstances.
8. A notice regarding this information collection was published on page 16911-16912 of the Federal Register dated April 2, 2010. No comments were received in response to the notice.
9. VA does not provide any payments or gifts to respondents.
10. If a change in enrollment is reported, the VA Form 22-1999V is retained in the individual's education folder. Forms that do not show changes in enrollment status are eventually destroyed in accordance with the VA directives. Our assurance of confidentiality is covered by 38 U.S.C. 3680 and 3684, and our Systems 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 questions on this form are considered to be of a sensitive nature.
12. The estimated annual burden for the collection of this information is 35 hours based on 425 responses. The estimated number of respondents (schools) is 64. We continue to estimate the school will need approximately five minutes to complete and process each VA Form 22-1999V.

This estimate is determined as follows:

- a. The estimated number of respondents is 64. In the past, VA received approximately 18,000 responses from 2,800 schools. VA estimates that we will receive 425 responses annually. Using the same ratio, we estimate that the 425 responses will be received from approximately 64 schools.
- b. Approximately 560 students received advance payments in FY2009. Consistent with the Presidential Budget Submission, VA expects to receive an average of 425 responses annually over the next three years.

13. This submission does not involve any record keeping costs. There is no annual cost to the public since schools and training establishments are paid an annual reporting fee for handling advance payments.

14. The annual cost to the Government for administering the form is estimated to be \$5,735 based on 425 responses annually. This cost is determined as follows:

- a. We estimate that 382 (90%) of the responses received will not require a change in the student's enrollment. It takes approximately 5 minutes to process forms with no change. No change forms are processed by employees in the Finance division with an average salary of \$15.20 (GS 4, step 5). It will take approximately 32 hours to process all forms received resulting in a processing cost of \$486.00
- b. We estimate that 43 (10%) of the responses received will require a change in the student's enrollment. It takes approximately 20 minutes to process forms that indicate a change in enrollment. Change forms are processed by employees in the Education division with an average salary of \$25.77 (GS 9, step 5). It will take approximately 14 hours to process all forms received resulting in a processing cost of \$361.00
- c. In accordance with 38 USC 3684 schools receive \$7 for each student certified without advance payment and \$11 for each student certified with an advance payment. The net amount paid to schools for an advance payment is \$4 per student (\$11 - \$7). We estimate that \$4675 (425 x 4) of the total amount of reporting fees paid each year will be attributable to advance payment certifications.
- d. The administrative cost is \$213. This amount was determined by multiplying \$.50 (printing and distribution costs) by 425.

15. The requested burden estimate of 35 hours represents a significant decrease from 1516 hours reported in the previous submission. Subsequent to the last submission, a new educational assistance program, Post-9/11 GI Bill, was established. The Presidential Budget Submission estimates that the majority of individuals eligible under existing program will elect to receive benefits under the Post-9/11 GI Bill. Advance payments are not currently available under the new program, thus VA anticipates a significant decrease in receipt of advance payment certifications.

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

17. The collection instrument, VA Form 22-1999V may be reproduced and/or stocked by the respondents and veterans service organizations. This VA Form does not display an expiration date, and if required to do so would result in an unnecessary waste of existing stocks of this form. As this information collection is submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay agent action on the benefit sought. VA seeks to minimize the cost to itself of collecting, processing and using the information, by not displaying the expiration date. As a result, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-1999V.

18. This information collection fully complies with the requirements of 5 C.F.R. 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.