

**SUPPORTING STATEMENT FOR RENEWAL SUBMISSION OF  
CERTIFICATION OF AFFIRMATION OF ENROLLMENT AGREEMENT  
CORRESPONDENCE COURSE  
(OMB 2900-0576)**

**A. Justification**

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits for correspondence training under chapters 30, 32, 33, 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 statute provides that before VA can pay education benefits, the claimant must affirm in writing the enrollment agreement for the correspondence course after the expiration of 5 full days after the date that he or she signed the correspondence contract. Accordingly, VA Form 22-1999c, Certificate of Affirmation of Enrollment Agreement of Correspondence Course was developed to assist with this statutory requirement. The claimant either affirms the agreement or destroys this form. The claimant then notifies the correspondence school of this decision. If the agreement is affirmed, the claimant enters a date no later than the seventh day after the date the agreement was signed, signs the form, and then the claimant sends the completed form to the correspondence school. The correspondence school's Certifying Official attaches an enrollment certification to VA Form 22-1999c and sends both forms to VA for processing.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3686(b)
- b. 10 U.S.C. 16136(b)
- c. 10 U.S.C. 16166(b)
- d. 38 C.F.R. 21.4256(b)

2. VA uses information from the current collection to pay education benefits for correspondence training. This information allows VA to determine if the claimant has been informed of the 5 day reflection period required by law.

3. This collection has been converted to an electronic fillable format which is available on the internet. Due to cost restrictions, it is prohibitive to have this form made capable to be submitted electronically.

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

5. There is no impact on education institutions or small business since this information collection only affects individual claimants eligible for education benefits based on correspondence training.
6. Collecting this information is done when a claimant requests education benefits based on approved correspondence training.
7. The collection of this information does not require any special circumstances.
8. The Department notice for public comments was published in the Federal Register on November 23, 2010 page 71796. No comments were received in response to this notice.
9. VA does not provide any payments or gifts to respondents.
10. If the claimant affirms the agreement, the VA Form 22-1999c is retained in the claimant's education folder. Privacy to the extent permitted by law is covered by 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, 2009 Compilation.
11. None of the questions on this form are considered to be of a sensitive nature.
12. The estimated total annual burden to the public is 45 hours. This estimate is determined as follows:

Average Annual Number of Respondents:	896
Average Number of Responses Annually:	1.00
Number of Responses Annually:	896
Time per Response:	3 minutes
Annual Response Burden:	45 hours
- The average number of claimants who entered correspondence courses from FY 2009 through FY 2010 was 896. It is estimated that the same number of claimants will enter correspondence courses annually from FY 2011 through FY 2013. The amount of time for each submission remains 3 minutes.
13. The estimated annual burden to the public is \$675 (45 burden hours x \$15).
14. This submission does not involve any recordkeeping costs. The annual cost to the Federal Government for administering this information

collection activity is \$1,256 based on a GS 9/5 (\$28.04/hour) veterans' claims examiner taking approximately 3 minutes to process each of the 896 responses.

15. The change in the annual reporting burden hours is due to the overall decrease in the number of claimants entering correspondence courses.

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

17. The collection instrument, VA Form 22-1999c does not display an expiration date, and if required to do so would result in an unnecessary waste of this form. As this information 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 22-1999c.

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

## **B. Collections of Information Employing Statistical Methods**

This collection of information by the Department of Veterans Affairs collection does not employ statistical methods.