

Supporting Statement for VA Forms 21-8960 & 21-8960-1
Certification of School Attendance or Termination
(2900-0458)

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. 38 U.S.C. 101 (4) and 38 CFR 3.667 provide the authority to pay benefits to or for a child who attends an approved course of instruction or training between the ages of 18 and 23.
2. VA Forms 21-8960 & 21-8960-1 are used to gather the necessary information to determine continued benefit entitlement to or for a child between the ages of 18 and 23 who is attending school.
3. VA Form 21-8960 is not available on the One-VA website for several reasons. VA Form 21-8960 is a computer-generated form which is dispatched only by VA's central computer system. VA Form 21-8960-1 is used by VA regional offices if VA Form 21-8960 is not correctly dispatched. Respondents may provide the information requested by VA Form 21-8960-1 via telephone, e-mail, or fax. Before VA Forms 21-8960 are mailed to beneficiaries, they are partially completed by VA with information that is specific to the beneficiary and the schoolchild for whom verification of school attendance is being requested. Additionally, beneficiaries are required to provide the information requested by these forms within 60 days from the date the form is generated, or benefits may be reduced or terminated. The date VA mails the form to the beneficiary is necessary in order to correctly determine due process and appeal periods. No data regarding the percentage of responses received via e-mail is available. Currently, there has been no consideration of using other information technology. The Department will reconsider using other information technology when the resources become available.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department.
5. The collection of information does not involve small businesses or entities.
6. VA compensation and pension programs require current information to determine eligibility for benefits. VA Forms 21-8960 & 21-8960-1 solicit information that is needed to determine continued benefit eligibility for schoolchildren between the ages of 18 and 23. If the collection were not conducted or were conducted less frequently, VA would be unable to verify continued entitlement in a timely manner, and increased overpayments would result.
7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on March 18, 2011 at pages 15050-15051. No comments were received in response to this notice.
9. No payments or gifts to respondents have been made under this collection of information.

10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22/28, "Compensation, Pension, Education, and Rehabilitation Records—VA " as set forth in Privacy Act Issuances, 1993 compilation found in 74 Fed. Reg. 117 (June 19, 2009).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 70,000 per year.

b. Frequency of Response is annually for most beneficiaries.

c. Annual burden is 11,667 hours.

d. The estimated completion time of 10 minutes is based on review by staff personnel and previous usage of these forms.

e. The total estimated cost to respondents is \$175,005 (11,667 hours x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$1575210

(GS-9/5 @ \$28.04 x 70,000 x 45/60 minutes = \$1,472,100)

(GS-3/5 @ \$14.73 x 70,000 x 6/60 minutes = \$ 103,110)

b. Printing and production cost \$980

c. Total cost to government \$1,576,190

15. There is no change in the reporting burden.

16. The information collection is not for publication or tabulation use.

17. The collection instrument, VA Forms VA 21-8960 & 21-8960-1, may be reproduced and/or stocked by the respondents and veterans service organizations. These VA forms do not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of these forms. These forms are submitted to OMB every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collecting, processing and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Forms 21-8960-1.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

The Veterans Benefits Administration does not collect information employing statistical methods.