

**SUPPORTING STATEMENT FOR VA FORM 22-8690,
OMB NUMBER 2900-0379
Time Record (Work-Study Program)**

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay work-study allowance to veterans and other eligible persons pursuing approved programs of education under Chapters 30, 31, 32, 33, and 35 of 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).

VA Form 22-8690 is a time sheet report used by a supervisor and an eligible individual to record and report the number of hours completed by the trainee. The form should be submitted after the trainee completes at least 50 hours of work.

The following administrative and legal requirements necessitate the collection:

- A. Title 38 United State Code § 3485
- B. Title 38 Code of Federal Regulations § 21.272 and § 21.4145.

2. VA uses the information collected on these forms to ensure that the amount of benefits payable to the student who is pursuing work study is correct. Without this information, VA would not have a basis upon which to make payment.

3. This form is not available for use through the internet by the general public due to the risk of fraud. However, the form is available in a fillable format. Both the supervisor and the work-study trainee must complete this form.

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 information collection cannot be reduced for small schools or other reporting organizations. The form must be submitted for any student receiving work-study benefits. The information provided must be uniform and consistent regardless of the size of the school or other reporting organization.

6. Payment of work-study benefits cannot be made without a completed form.

7. The collection of the information does not require any special circumstances.

8. The Department notice was published in the Federal Register on March 18, 2011 at page 15052-15053. No comments were received in response to this notice.

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

10. VA Form 22-8690 is retained permanently in the finance activity section at one of the Regional Processing Offices (RPO) to support the payments which have been made. 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 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. We estimate 60,503 forms will be submitted annually over the next three years. The estimated annual burden for the collection of this information is 5,042 hours (60,503 responses X 5min/60 = 5,042). The annual net cost to the public is \$75,630 (5,042 X \$15.00).

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

14. The estimated cost to the Federal government is \$376,026.60. VA calculated this amount as follows:

A GS 7/5 working in the Finance Division as an Accounts Receivable Analyst with an hourly salary of \$22.92 would need 15 minutes to process each of the 60,503 forms resulting in a cost of \$346,682.19.

We anticipate having mailing costs of \$28,436.41 per year based on mailing 60,503 forms (44 cent per stamp, and 3 cents for each envelop = \$.47).

We anticipate having printing costs of \$908 for 60,503 forms with a cost of \$15 for printing 1,000 forms (60,503 divided by 1000 X \$15 = \$908).

15. The decrease in the burden is a result of more accurate reporting capability. In 2009, VA deployed the Work-Study Management System (WSMS). WSMS is used by VA employees to enter and process time records received for work-study students. Using this data provides VA with more accurate and quantifiable means of projecting burden hours and costs.

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

17. The collection instrument, VA Form 22-8690, may be reproduced and/or stocked by the work-study supervisors. This VA form does not display an expiration date, and if required to do so, it would result in unnecessary waste of existing stocks of this form. As this form 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 Department action on the benefit being sought. VA also seeks to minimize the cost to itself for collecting, processing, and using the information, by not displaying the expiration date. For these reasons, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-8690.

18. This submission does not contain any exceptions to the certification statement. The 1320.8(b)(3)(i) and (ii) are stated on the form under the respondent burden and Privacy Act statements.

B. Collection of Information Employing Statistical Methods.

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