

Supporting Statement for VA Form 22-8794 & 22-8794a
(OMB Control Number 2900-0262)
Form Number 22-8794 and 22-8794a

A. Justification

1) The law requires educational institutions and job training establishments to designate an official that will be responsible for certifying approved training for veterans and other eligible persons. Each educational institution must have a VA Certifying Official on staff. The certifying official must submit to VA each student's enrollment information and any changes to such enrollment information. The "Designation of Certifying Official(s)" (VA Form 22-8794) provides VA with the names and signatures of those persons authorized to certify and submit to VA any new hours or changes in the enrollment of their VA students.

Additionally, Public Law 110-252, which established the Post-9/11 GI Bill - Chapter 33 program for Title 38 U.S.C., authorizes VA to pay a Tuition and Fees (T/F) stipend to the educational institution on behalf of the student every term, quarter or semester. VA uses "Electronic Funds Transfer (EFT) Information" (VA Form 22-8794a) to obtain the educational institution's account information to electronically deposit payments. VA Form 22-8794a is only submitted when an educational institutional requests to receive payments electronically and anytime there is a change to the account. This form will be submitted on an as needed basis as VA does not require regular re-certifications of EFT information.

The following administrative and legal requirements necessitate the collection:

A. Titles 38 U.S.C. 3034(a), 3241, 3323(a), 3492, 3680, and 3684(a).
10 U.S.C. 16136(b), and 16166(b)

B. Titles 38 CFR 21.4203(a), 21.5200(d), 21.5292(e)(2), 21.5810(a),
21.7140(a), 21.7652, and 21.7656.

2) VA uses VA Form 22-8794 to maintain a record of the person responsible for submitting and making changes to the enrollment. VA uses Form 22-8794a to ensure that student payments are sent to the correct account.

3) VA Education Service does not have the ability to accept and validate electronic signatures. As such, we are unable to accept the forms associated with this collection electronically. However, information technology is being

used to reduce the burden as the forms associated with these collections are available in an electronically fillable format. Upon completion, an official must sign and submit the forms to VA.

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 burden cannot be reduced for the smaller education institutions. The entries required for this information collection impose only a minimal burden on smaller VA approved facilities, equal to that of the larger institutions.

6) The consequences that would result if this collection was not submitted each time the person filling the position of Certifying Official changes could lead to erroneous student information being reported by someone other than the Designated Certifying Official and could therefore, lead to fraud.

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

8) The Department notice was published in the Federal Register on March 18, 2011, page 15049. No comments were received in response to this notice.

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

10) Once received, the form is processed and retained in the approval file for the educational institution, along with other information maintained by VA regarding the educational institution's approval. 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.

11) None of the information collected is considered to be of a sensitive nature.

12) The estimated annual burden for this collection is 917 hours. The estimated annual burden for the collection of VA Form 22-8794 is 750 hours based on 4,500 responses. We estimate that each respondent will need 10 minutes to complete the request. The estimated annual burden for the collection of VA Form 22-8794a is 167 hours based on 1,000 responses. We estimate that each respondent will also need 10 minutes to review the instructions and complete each form.

The total cost to the public is \$13,755. The cost to the public for VA Form 22-8794 is \$11,250 (750 hours x \$15.00) and \$2,505 (167 hours x \$15.00) for VA Form 22-8794a.

13) The submission of this information collection results in no record-keeping costs.

14) The cost to the Federal Government for administering this form is estimated at \$32,721.33 based upon 5,500 total responses this collection.

The processing cost was determined based upon an Education Liaison Representative (ELR) processing 5,500 responses with a processing time of 10 minutes per response, using an average hourly salary of a GS 11/5 at \$33.92. ($5,500 \times 10\text{min} / 60\text{min} \times \$33.92 = \$31,093.33$).

Administrative costs for printing and distribution for this collection is \$100.00.

The mailing cost for VA Form 22-8794 is \$1,058 based on 4,500 responses at \$.47 (First class stamp \$.44 and \$.03 for each envelope). Since approximately half of these forms are brought to the RPO by the ELR, we estimate only half of the forms require mailing, ($4,500/2 \times \$.47 = \$1,058$). The mailing cost for VA Form 22-8794a is \$470.00 based on 1,000 responses at \$.47 each. ($1,000 \times \$.47 = \470.00).

15) The change in the annual burden is the result of an increase in the total number of responses received.

16) VA does not publish this information or make it available for public use.

17) The collection instruments, VA Forms 22-8794 and 22-8794a, may be reproduced and/or stocked by VA personnel. 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 Forms 22-8794 and 22-8794a.

18) The collection of this information fully complies with all 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.