

**SUPPORTING STATEMENT FOR VA FORM 22-0840,  
ACCELERATED PAYMENT VERIFICATION OF COMPLETION  
(OMB 2900-0636)**

**A. Justification**

1. The Department of Veterans Affairs (VA) is authorized to pay accelerated education benefits to veterans and persons on active duty pursuing approved programs of education under chapter 30, title 38, United States Code and chapters 1606 and 1607, title 10, United States Code.

Public Law 107-103 authorized the accelerated payment option under 38 U.S.C. chapter 30, effective October 1, 2002. Public Law 110-181 authorizes the accelerated payment option under 10 U.S.C. chapters 1606 and 1607, effective October 1, 2008. Section 3014A of title 38, and sections 16131a and 16162a of title 10 provide that the Secretary must prescribe regulations including the requirements for the request, certification of receipt, and use of an accelerated payment under these education programs.

38 CFR section 21.7154(d)(1) provides the rules for certification and use of the accelerated payment option under 38 U.S.C. chapter 30. Sections 16131a(f) and 16162a(f) of title 10, United States Code provide the rules for certification and use of the accelerated payment option under chapters 1606 and 1607, respectively. Furthermore, those sections authorize VA to use existing codified regulations for the accelerated payment option under chapter 30 to administer that option under chapters 1606 and 1607. The Accelerated Payment Verification of Completion Letter is used to obtain the certification and use of payment in accordance with the aforementioned statutes.

2. VA uses this certification information to implement the regulations regarding receipt and use of the accelerated payment.

3. Information technology is not being used to reduce the burden. VA considers this information collection as being too small to warrant the cost of developing an electronic collection. The request for accelerated payment may be electronically submitted and collected on OMB 2900-0073 (VA Form 22-1999).

4. A review was 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. Chapter 30, 1606, and 1607 claimants are the only sources for this information. The information collection does not have any impact on small businesses or other small entities.

6. VA would not be able to administer the certification provision of accelerated payment set by law and regulation without this collection.
7. Generally, an individual will not request more than one accelerated payment per term. However, some training programs offer short duration high cost courses that last anywhere from a week to several weeks. If an individual enrolls in several short duration courses during a term, it is possible he or she will request more than one accelerated payment. In those instances, we would obtain more than one certification per term.
8. The Department notice was published in the Federal Register on September 28, 2011, pages 60132-60133. There were no comments received in response to this notice.
9. VA does not provide any payment or gifts to respondents.
10. After processing, the claimant's information is retained in his or her education record. We periodically destroy these records. If a claimant's education record is destroyed, all documents contained in that record are also destroyed. 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. No information is considered to be of a sensitive nature.
12. The total estimated annual burden to the public for this information collection is 44 hours for 349 respondents submitting 524 responses.

We projected the number of accelerated payments that VA will make in future years by using the data from the FY 2008, FY 2009, and FY 2010 Presidential Budget Submissions.

We believe that each claimant will use an average of 1.5 accelerated payments per year. Therefore, we estimate that 349 respondents will request 524 accelerated payments annually with each requiring the certification letter. .

The law requires respondents to furnish any increase or decrease in hours of pursuit, whether or not the course was successfully completed, and an explanation of how the accelerated payment was used. VA estimates that a respondent would need approximately 5 minutes to complete this letter. Based on a cost of \$15.00 per hour, for 44hours, the cost to the public in burden hours is \$660.00.

13. This submission does not involve any recordkeeping costs.

14. VA estimates that the total annual cost to the government for administering applications for accelerated program is \$7,570.48 annually.

a. We estimated the time to process and mail certifications to respondents will be \$2,672.83 (GS 9/5 @ \$28.04 x 524 x 10 minutes/60 = \$2,448.83) plus \$224.00 for \$.44 postage, \$.03 for the envelope.

b. We estimated the cost for processing the certification completion responses will be \$4,897.65 (GS-9/5 @ \$28.04 x 524 x 20 minutes/60 = \$4,897.65).

15. This submission reflects a reduction in burden to the public due the decreased number of individuals requesting accelerated payments.

16. The information is not for publication or tabulation.

17. The data collection instrument, the Accelerated Payment Verification of Completion letter, is generated from our data processing center. It can take months to update such letters. This letter currently does not display an expiration date. If required to do so, it could create an administrative burden on VA. As this information collection is submitted to OMB for approval every three years, this date requirement would delay agency action on the benefit being sought. VA therefore continues to seek an exemption that waives the displaying of the expiration date.

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

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

The data collection does not employ statistical methods.