

**SUPPORTING STATEMENT FOR VA ENROLLMENT CERTIFICATION, VA
Form 22-1999
OMB Number 2900-0073**

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C., section 510 and chapters 1606 and 1607, title 10, U.S.C., and sections 901 and 903 of Public Law 96-342. Educational institutions and training establishments are required to use the VA Form 22-1999, Enrollment Certification, to report to VA, without delay the information concerning the enrollment or reenrollment into the training of Veterans, service persons, reservists, and other eligible individuals. In certain instances, the enrollment certification is used by VA to authorized and make payments in advance if the trainee requests an advance payment. In other instances, VA is authorized to make lump sum payments of up to 60% of a claimant's tuition and fees if the trainee requests an accelerated payment. In these cases, VA Form 22-1999 serves as the trainee's request for an accelerated payment as well as for the educational and/or training institution's report of the trainee's enrollment.

The following administrative and legal requirements necessitate the collection:

A. 38 U.S.C. 3034, 3241, 3323, 3680; and 3684, 10 U.S.C. 16136, and 16166

B. 38 CFR 21.4203, 21.5200(d), 21.7152, 21.7652, and 21.9720

2. VA uses the information collected on VA Form 22-1999 to determine the amount of educational benefits payable to the trainee during the period of enrollment or training. Additionally, VA also uses these forms to determine whether the trainee has requested an advance payment or accelerated payment of benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting an advance or accelerated payment.

3. Information technology is being used to reduce the burden. VA allows schools to submit the information using VA Online Certification of Enrollment through (VA-Once). The majority of enrollment certifications received are submitted electronically.

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

5. The educational institutions and job training establishments providing training are the only sources for this information. The information collection burden cannot be reduced for small educational institutions or job training

establishments. The form must be submitted for any student receiving benefits under VA education programs. The information provided must be uniform and consistent regardless of the size of the educational institution or job training establishment.

6. VA would not be able to pay benefits for training if this information were not collected.

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

8. The Department notice was published in the Federal Register on November 1, 2011, Volume 76, Number 211, page 67561). One comment was received in response this notice requesting that VA define the term "credit hours". No change was made based on this comment.

9. VA does not provide any payments or gifts to respondents.

10. 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, 2011 Compilation.

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

12. The estimated annual burden for the collection of the information is 239,339 hours. There is no estimated annual cost to the public as costs incurred are offset by school reporting fees paid by VA. 38 U.S.C. 3684 directs VA to pay each institution \$11 for each student certified or \$15 for any students certified for advance payment during the calendar year.

VA received responses from approximately 9,000 schools from FY 2009 through FY 2011. VA also estimates that it will continue to receive responses from approximately 9,000 schools over the next three years. Historically, VA has received an average of 2 enrollment certifications (responses) for each trainee each year. Based on the fiscal year (FY) 2012 Presidential Budget Submission, VA estimates that an average of 854,787 students will train each year from FY 2012 through FY 2014 resulting in approximately 1,709,574 responses each year based on the receipt of two submissions per year, per student.

Based on an estimated receipt of 1,709,574 responses as indicated above, the annual burden is 284,929 hours.

Therefore, the annual cost to schools that submit responses electronically is estimated to be \$4,273,935 based on 284,929 hours based on the respondents' cost of \$15 an hour.

This total annual public burden cost of \$4,273,935 is offset by school reporting fees paid by VA. VA pays each school that furnishes training under various education programs a fee for processing all required VA reports or certifications for each trainee. These fees help defray the costs of processing paperwork and are provided in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967, and have been increased per Public Law 111-377 effective October 1, 2011. These reporting fees provisions are codified in 38 U.S.C. 3684. As a result, there is no additional cost to the public for this information collection.

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

14. The Annual Cost to the Government for administering this form is estimated at \$14,685,241. VA estimates it will take a GS 9/5 Claims Examiner (paid \$25.77 per hour) 20 minutes to process each response (1,709,574) equaling \$14,685,241 in administration costs.

15. The change in the annual burden is due to the overall increase in the number of trainees as a result of implementation of Post-9/11 GI Bill. The increase is also reflected as a result of an increase to the hourly wage of VCE's processing each submission.

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

17. The collection instrument, VA Form 22-1999, may be reproduced and/or stocked by the educational institutions. 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 these forms are submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the educational institutions and would delay VA action on the adjustment or termination of education benefits. VA also seeks to minimize the cost to itself of collection, 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 22-1999.

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

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.