

**SUPPORTING STATEMENT FOR VA FORMS 22-8691,  
22-8692, 22-8692a, and 22-8692b [Work-Study]  
(OMB 2900-0209)**

**A. Justification.**

1. The Department of Veterans Affairs (VA) is authorized to pay work-study benefits to Veterans and other eligible individuals who are receiving educational assistance 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 National Call to Service Provision of Public Law 107-314.

In order to receive work-study benefits, eligible individuals must complete VA Form 22-8691, Application for Work-Study Allowance. The eligible individual then enters into an agreement with VA in which he or she agrees to work a specified number of hours. If the individual wants a payment of work-study allowance in advance of working those hours, VA Form 22-8692, Student Work-Study Agreement (Advance Payment), is used. If the individual does not want an advance payment of the work-study allowance, VA Form 22-8682b, Student Work-Study Agreement, is used. If the individual wants to extend the work-study contract, VA Form 22-8692a, Extended Student Work-Study Agreement, is used.

Section 3485 of title 38, United States Code, and section 21.4145 of title 38, Code of Federal Regulations necessitate these collections of information.

2. VA uses the information collected to determine the individual's eligibility for the work-study allowance, the number of hours the individual will work, the amount payable, whether the individual desires an advance payment, and whether the individual wants to extend the work-study contract.
3. Work-Study applicants complete these forms and return them to the VA Regional Processing Office of jurisdiction for processing. The work-study application is available in an electronically fillable format on VA's website. At this time, information technology cannot be used to further reduce the burden of this information collection. Except for the application form, these forms go back and forth between VA and the claimant before the contract is finalized. This method of collecting the information is the most efficient and causes the least burden on the public. Further automation of these submissions is not practical due to the low frequency of the information collection and the complexity of developing a system for the full electronic submission of this information collection.
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. The information collection only affects individual claimants. There is no impact on educational institutions or small businesses.

6. If this information were not collected or collected less often, VA could not pay work-study benefits. There are no technical or legal obstacles to prohibit reduction of the collection burden.
7. The collection of information does not require any special circumstances.
8. The public was informed of the right to submit comments on this information collection. The Federal Register notice was published on November 1, 2011, page 67558. No comments were received in response to this notice.
9. VA does not provide any payment or gift to respondents.
10. These forms are retained permanently in the claimant's work-study folder. 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, 2011.
11. None of the information collected is considered to be of a sensitive nature.
12. The annual burden estimate for these collections of information is 5,795 hours. The estimated number of annual responses for Fiscal Years (FY) 2012 through 2014 is based on an annual average of the number of applications, contracts, and extensions processed during FY 2007, 2008, 2009 and 2010.

We calculated the average of the total number of responses received in each category (applications, contracts, and extensions) for FY 2007, 2008, 2009 and 2010 as shown below:

	APPLICATIONS (VA 22-8691)		CONTRACTS APPROVED (VA 22-8692 & 22-8692b)	CONTRACTS EXTENDED (VA 22-8692a)
	APPROVED	DENIED		
FY 07	13,927	2,254	13,289	628
FY 08	14,805	2,537	14,521	403
FY 09	14,862	3,306	13,814	989
FY 10	17,017	3,563	16,993	1,416
TOTAL	60,611	11,660	58,617	3,436
AVERAGE	15,153	2,915	14,654	859

These respective averages (18,068 applications; 14,654 contracts; 859 extensions) were rounded up to the nearest hundred, then used to project the number of applications, extensions, and contracts that would be completed annually for FY 2012 through 2014. Using these figures (18,100 applications; 14,700 contracts;

and 900 extensions), we project the estimated annual hour burden for claimants in FY 2012, 2013, and 2014 will be as follows:

FORM	TIME (Minutes)	# of Forms	HOURS
VA Form 22-8691 (approved & denied)	15	18,100	4,525
VA Form 22-8692 & 22-8692b	5	14,700	1,225
VA Form 22-8692a	3	900	45
	TOTAL	33,700	5,795

Based on a cost of \$15.00 per hour (includes mailing costs) for 5,795 hours plus the mailing costs, the cost to the public is estimated to be \$86,925 annually.

13. This submission does not involve any recordkeeping costs.
14. The estimated total cost to the Federal government for processing these information collections is \$112,552. VA calculated this amount as follows:

The VA Regional Processing Office has a GS 6 (step 5) process these information collections. Based on the current hourly pay for this employee of \$18.96 per hour for the cost for processing these forms is \$105,070.

FORM	Hourly Rate	X's of Forms	Time to Complete	Divided by 60	COST
VA Form 22-8691	\$18.96	18,100	10 min		\$57,196
VA Form 22-8692 & 22-8692b	\$18.96	14,700	10 min		\$46,452
VA Form 22-8692a	\$18.96	900	5 min		\$1,422

VA Form 22-8691 is available in an electronically fillable format at VA's website. The majority of applicants obtain this form on-line. VA's annual cost for printing the 5,000 application forms (approximately 25 percent of the total number used) needed for distribution is \$150 (\$30 per 1,000 forms).

VA Forms 22-8692, 22-8692a, and 22-8692b are completed electronically in the Regional Processing Office. The annual cost for mailing contracts and extensions to students for signature is \$7,332 (15,600 contracts/extensions X .47 mailing costs).

15. The increase in the public burden hours to the current estimate of 5,795 hours (for 33,700 responses) reflects the increase in the annual projected number of applications, contracts, and extensions for FY 2012 through 2014 based on the actual number of these forms submitted for FY 2007, 2008, 2009 and 2010.

16. VA does not publish this information or make it available for publication.
17. The collection instruments, VA Forms 22-8691, 22-8692, 22-8692a, and 22-8692b, may be reproduced and/or stocked. These forms do not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of the forms. As these forms are submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay agency action on the benefit being sought. VA also seeks to minimize the 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 22-8691, 22-8692, 22-8692a, and 22-8692b.
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.