

SUPPORTING STATEMENT FOR VA FORM 22-5490  
Survivors' and Dependents' Application for VA Education Benefits  
(2900-0098)

Justification

1. Spouses, surviving spouses, and children of Veterans or servicemembers must submit evidence to establish basic eligibility for and entitlement to Survivors' and Dependents' Educational Assistance (DEA) and Post-9/11 GI Bill Marine Gunnery Sergeant John David Fry Scholarship (Fry Scholarship) under chapter 35 and chapter 33 (respectively), title 38, U. S. C.

VA Form 22-5490 serves as the procedural requirement for applicants to apply to the Department of Veterans Affairs (VA) for DEA and Fry Scholarship benefits.

The following statutes and regulations require this information collection:

- a. 38 U. S. C. §3311, 3513, 5113, 5101, 5102, and 5103.
- b. 38 Code of Federal Regulations 21.3030 and 21.9510.

2. VA claims examiners use the information from this collection to help determine whether an applying individual qualifies for DEA or Fry Scholarship benefits. The information will also be used to determine if the program of education the applicant wishes to pursue is approved for assistance. The information on the form can be obtained only from the claimant, and a determination cannot be made without the information.

3. Information technology is helping to reduce the burden. The electronic collection is made via an internet-based application called Veterans Online Application (VONAPP) that collects the same information as the printed VA Form 22-5490. VONAPP allows applicants to submit information directly to the Regional Processing Office (RPO) with jurisdiction over the claim, reducing error potential and speeding the application process.

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. This collection involves only DEA and Fry Scholarship claimants. There is no impact on education institutions or small businesses.

6. Without this information, VA would not have any basis to make determinations of eligibility for DEA and Fry Scholarship benefits. The information is collected only when the claimant requests DEA and Fry Scholarship benefits.

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

8. The Department notice was published in the Federal Register on January 25, 2012, page 3844. No comments received in response to this notice.

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

10. VA Form 22-5490 is retained permanently in the claimant's education folder. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28), which are contained in the Privacy Act Issuances, 2011 Compilation.

11. None of the questions on this form are considered to be of a sensitive nature.

12. The estimated annual burden hours for the collection of the information is 22,277 hours.

a. The average number of individuals who applied for this benefit from FY 2009 to 2011 was 37,604 annually. Each applicant has the option of filing this form either electronically or on paper. We estimate it will take approximately 45 minutes for the average applicant to complete and return the paper version of VA Form 22-5490, and approximately 25 minutes for the average applicant to complete and submit the electronic version of this form.

The average number of respondents who will complete the form on paper is 19,827. (19,827 respondents x 45 minutes divided by 60 equals 14,870 hours).

The average number of respondents who will complete the form electronically is 17,777. (17,777 respondents x 25 minutes divided by 60 equals 7,407 hours).

The average total number of respondents who will complete the form annually is 37,604. The total estimated annual burden is 22,277 hours.

b. The annual cost to the public is estimated at \$334,155. The 22,277 hours required to complete the form, at \$15 per hour equals \$334,155.

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

14. The annual cost to the government for administering this form is estimated at \$289,842. This is based on the following:

a. VA estimates that it will take 20 minutes for a GS-9, step 5 claims examiner who makes \$25.77 per hour to process each paper application and 15 minutes to process each electronic application. The estimated

annual cost of processing paper applications is \$170,314. (19,827 respondents x 25.77 x 20 minutes divided by 60 equals 170,314). The estimated annual cost of processing electronic applications is \$114,528. (17,777 respondents x 25.77 x 15 minutes divided by 60 equals 114,528).

b. The administrative costs are \$5,000. This is the total for development, design, printing, and distribution of 37,604.

15. The annual burden of this collection has decreased. Although there has been an increase in the total number of respondents, the number of applicants submitting VA Form 22-5490 electronically has also increased. Since the electronic submission of this form requires less time than the paper version, the burden is reduced.

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

17. The collection instrument, VA Form 22-5490, may be reproduced and/or stocked by the respondents and veterans service organizations. 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 respondents and would delay Department action on the benefit being sought. VA also seeks to minimize the cost of collection, processing, and using the information in 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 22-5490.

18. This information collection fully complies with all the requirements of 5 CFR 1320.9 and 1320.8(b)(3).

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

This collection of information by the Department of Veterans Affairs does not employ statistical methods.