

**SUPPORTING STATEMENT FOR  
YELLOW RIBBON AGREEMENT VA Form 22-0839  
(2900-0718)**

1. Public Law 110-252 authorizes the Department of Veterans Affairs (VA) to administer an education benefit program known as the Post-9/11 GI Bill. Section 3317 of title 38, United States Code, establishes the Yellow Ribbon G.I. Enhancement Program, referred to as the "Yellow Ribbon Program." The Yellow Ribbon Program allows institutions of higher learning (IHLs) to voluntarily enter into an agreement with VA to waive a portion of the outstanding amount of established charges not otherwise covered under the Post-9/11 GI Bill. VA will match the amount waived by the IHL; however, VA's portion will not exceed fifty percent of the total outstanding amount of established charges. IHLs wishing to participate in the Yellow Ribbon Program are required to submit the Yellow Ribbon Program Agreement (VA Form 22-0839) indicating the maximum number of students that will receive benefits under the program, the maximum dollar amount of outstanding established charges that will be waived for each student based on student status (i.e., undergraduate, graduate, doctoral) or subelement (i.e., college or professional school), and the way in which the contribution will be given (i.e., direct grant, scholarship, or other).

Title 38 U.S.C. 3317 necessitates this collection of information.

2. VA will use the information collected to determine which IHLs will be participating in the Yellow Ribbon Program, the maximum number of individuals for whom the IHL will make contributions in any given academic year, the maximum dollar amount of outstanding established charges that will be waived for each student based on student status (i.e., undergraduate, graduate, doctoral) or subelement (i.e., college or professional school).

3. At this time, information technology cannot be used to reduce the burden. VA does not have the technology to obtain signatures electronically and cannot require all schools to use information technology to submit this information.

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. Collection of this information will not have an impact on small businesses or other small entities. Participation in the Yellow Ribbon program is voluntary; therefore, IHLs are not required to submit this information to VA.

6. If the information is not collected, VA will not be able to administer the provisions of the Yellow Ribbon Program as mandated by statute.

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

8. The Department notices were published in the Federal Register on March 14, 2012, Volume 77, Number 50, pages 15187 and 15188. There were comments received from one member of the public in response to this notice. It was suggested by the commenter that the respondent burden was inaccurate. The commenter noted that the time needed to compile the data required for the completion of this form was much greater than the 10 minutes allocated for completion of this form. As a result of this comment, a survey was conducted to obtain a more accurate estimate of the time it takes schools to complete the form. The results of the survey indicate that it takes schools an average of 14 hours to gather the materials, review information, and complete the Yellow Ribbon Program Agreement. As such, we have changed the respondent burden to 14 hours.

Additionally, the commenter expressed concern that the Yellow Ribbon Program open enrollment season for the 2012-2013 academic year began while VA is in the process of obtaining approval. VA is submitting a request for renewal of a currently approved form. The Yellow Ribbon Program Agreement was approved June 2009 for three years. The approval is set to expire June 2012. To ensure there is no lapse in approval, VA is requesting renewal. However, the form that was approved June 2009 and amended March 2012 (with non-substantive changes) is the form that is being used for the current open enrollment season. The open enrollment season generally runs from March 15<sup>th</sup> through May 15<sup>th</sup> of each calendar year. As the approval of the form is valid through June 30, 2012, there was no need to delay the Yellow Ribbon Program open enrollment season.

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

10. The form used to collect this information does not require any sensitive or private data. Title 38 U.S.C. 3317 requires that the information collected be made available to the public via a website; therefore, there is no implied assurance of confidentiality. Information provided on the form will be available for viewing via a link at VA's Education Service website ([www.GIBILL.va.gov](http://www.GIBILL.va.gov)).

11. None of the information collected is of a sensitive nature.

12. The total estimated burden to the public for this information collection is 21,532 hours, with submissions by 1,538 respondents. The estimated cost to the public is \$322,980. VA calculated the number of respondents, burden hours, and costs as follows:

VA received an average of 1,538 agreements each year over the last three years. Based on a survey of schools it was determined that it takes approximately 14 hours to gather the materials, review necessary information, and complete the Yellow Ribbon Program agreement. Based on a cost of \$15.00 per hour for 21,532 hours, the cost to the public is estimated to be \$322,980.

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

14. The estimated cost to the Federal government is \$37,181. VA calculated this amount as follows:

Completed Agreement Forms Processed by VA:

We estimate the processing time for each Yellow Ribbon Agreement will be 30 minutes by a GS 13/5 employee in Washington, DC with an hourly wage of \$48.35. The cost will be \$37,181.

15. The increase in the annual reporting burden is due the under estimation of the time required to compile the data needed to complete the Yellow Ribbon Program Agreement.

16. VA will post the Yellow Ribbon Agreement form to the GI Bill website by the second week of March in each calendar year. The deadline for completed agreements to be received by VA is May 15th of each calendar year (or the next business day if the 15th is a Saturday or Sunday). VA will publish the terms of the agreement via a link at [www.GIBILL.gov](http://www.GIBILL.gov).

17. VA is not requesting an exemption from displaying the expiration date on this form.

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

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

This collection of information by the Veterans Benefits Administration does not employ statistical methods.