

SUPPORTING STATEMENT FOR VA FORM 22-1990
OMB NUMBER 2900-0154

A. Justification.

1. In order to receive VA Educational Assistance Allowance under chapters 33 and 30 of title 38, U.S.C., chapters 1606 and 1607 of title 10, U.S.C., and sections 901 and 903 of Pub. Law 96-342, veterans, servicepersons, and reservists must complete VA Form 22-1990, Application for Education Benefits. Each individual completes the form only once.

The following administrative and legal requirements necessitate the collection:

38 U.S.C. 3034; 3241, 3323(a), 3471, 5101(a); Pub. Law 96-342, sections 901 and 903; 10 U.S.C. 16136(b), and 16166(b).

2. The claimant uses this form to submit an initial (or "original") claim for VA education benefits. The information requested on this form helps VA determine the applicant's eligibility to education benefits listed in item 1(a). In order to streamline the application process for the claimant, we have divided one large application into three, removing the two least used programs (National Call to Service (NCS) Transfer of Entitlement (TOE) and developing separate applications for those programs, the VA Form 22-1990E and VA Form 22-1990N.

3. Information technology is being used to reduce this burden. Claimants have the option of using VONAPP (Veterans On-Line Application) to submit the information via the Internet. Additionally, we have converted this form into an electronic fillable format available on the Internet. VA estimates that 70% of claimants submit the form via VONAPP.

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

5. The information collection only involves individuals (veterans, servicepersons and reservists). There is no impact on educational institutions or small businesses.

6. If this information is not collected or is collected less often, VA could not pay education benefits. There are no technical or legal obstacles to reducing the burden.

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

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 24570-24571 of the Federal Register dated May 2, 2011. No comments were received in response to this notice.

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

10. VA Form 22-1990 is retained permanently in the student's education file. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education, Vocational Rehabilitation and Employment Records — VA (58VA21/22/28) which are contained in the Privacy Act Issuances, 2009 Compilation.

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

12. VA has updated the estimated annual burden for this collection of information due to streamlining the application itself. Our burden estimate is 205,696 hours for 671,087 responses.

The number of respondents and burden hours:

The chart below includes the actual number of trainees from Fiscal Year (FY) 2011 and the projected number of trainees for FY 2012 and FY 2013. The projected numbers are from Education Service's Strategic Development team and are considered valid estimates based on past performance:

Program	FY 2011	FY 2012	FY 2013
Chapter 33	365,640	492,773	512,752
Chapter 30	248,075	179,095	129,153
Chapter 1606	67,381	78,666	84,427
Chapter 1607	30,281	24,929	23,785
Total	711,377	775,463	750,117

Of the total number of trainees for FY 2011, 640,239 were original claims, or roughly 90% of total claims received that year. Using that ratio, we expect that approximately 697,916 original claims will be filed in FY 2012 and roughly 675,105 original claims will be received in FY 2013. This provides an average of 671,087 original claims expected yearly.

Each claimant has the option of filing this form electronically using the VONAPP program or on paper. We estimate that it takes 15 minutes for the average claimant to complete and return the paper version of VA Form 22-1990 and an estimate of 20 minutes for the average claimant to complete either electronic means of submitting the VA Form 22-1990. Our records show that approximately 70% of claimants apply using the VONAPP computer application.

Type of Submission	%	Number	Minutes Each	Hours
VONAPP	70%	469,761	20	156,587
paper	30%	201,326	15	50,332
	100%	671,087		206,919

The cost to the public is \$3,103,785 (15 x 206,919 burden hours)

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

14. The estimated annual cost to the Federal Government for administering this collection of information is \$10,347,066 based on 671,087 responses annually:

a. For the approximate 201,326 applications submitted on paper, a GS 4 step 5 clerk who earns \$13.31 per hour scans the paper form into The Image Management System (TIMS), an electronic file system. This step should take approximately 5 minutes per application. 5 minutes times 201,326 responses gives a total of 16,710 hours. The cost to the government for scanning the paper forms at \$13.31 per hour totals \$222,410.

b. After scanning, each application is processed by an adjudicator working at the GS 9 step 5 rate (\$22.57). The adjudicators will need approximately 40 minutes to process each original claim. 40 minutes times 671,087 TOTAL responses (regardless of how the application is submitted) is 442,917 hours. The cost to the government for processing all 671,087 responses at \$22.57 per hour is \$10,347,066.

c. VA also incurs a yearly maintenance cost for the VONAPP application of \$5,000.

d. Administrative costs are as follows:

Costs for printing the 201,326 paper forms, at \$30 per thousand, totals \$6,040.

Approximately one half of the 201,326 forms are mailed directly to the claimant, or 100,663 forms. Mailing the forms costs \$47,312 (assuming a first class stamp of 44¢ and an envelope costing 03¢ for a total of 47¢).

Approximately one half of the 201,326 forms are bulk mailed to schools for distribution to claimants. VA has the printing contractor place 100 forms in a standard pack and then mails these 634 packets (approximate weight one pound) to schools. The cost of mailing one of the packets is approximately \$2.42. To mail 634 packets at \$2.42 each totals \$1,534.

Total mailing costs for mailing 100,663 paper forms to claimants is \$47,312.00
Total mailing costs for mailing 100,663 bulk packages to schools is \$1,534.00

Total administrative costs (printing = \$6,040, mailing = \$47,312) is \$53,351.

15. The increase is due to the additional applicants eligible to receive benefits under the Post-9/11 GI Bill, created by Public Law 110-252, which became effective on August 1, 2009.

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

17. The collection instruments, VA Form 22-1990, VA Form 22-1990 E and VA Form 22-1990 N may be reproduced and/or stocked. These VA forms do 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 3 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 Form 22-1990, VA Form 22-1990 E and VA Form 22-1990 N.

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 by the Veterans Benefits Administration does not employ statistical methods.