

**SUPPORTING STATEMENT FOR VA FORM 22-8873**  
**OMB NUMBER 2900-0358**  
**Supplemental Information for Change of Program or Reenrollment After**  
**Unsatisfactory Attendance, Conduct, or Progress**

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay education benefits to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 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 NCS (National Call to Service) (10 U.S.C., chapter 31, section 510). This information collection involves "change of program" and "unsatisfactory attendance, conduct, or progress" issues. 38 U.S.C. 3691 allows eligible persons to change their program of education and 38 U.S.C. 3474 addresses discontinuance for unsatisfactory conduct or progress.
2. VA uses the information provided from the current collection to ensure (1) that programs are suitable to a claimant's aptitudes, interests, and abilities and (2) that the cause of any past unsatisfactory attendance, progress, or conduct has been resolved. Without this information, VA could not determine further entitlement to education benefits.
3. VA has converted these forms into an electronic fillable format which is available on the Internet. The claimant can access the form electronically, complete it, and print it. The form would then need to be mailed to the VA. Information technology is not currently being used to reduce the burden because this form represents a relatively small collection of 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. This information collection involves only individuals that are eligible for VA education benefits. This information collection does not involve education institutions, small businesses, or other small entities.
6. Statute does not allow for further payment of educational assistance without the information collected on this form. Less frequent collection of this information would preclude VA's ability to determine whether further educational benefits can be authorized.
7. The collection of this information does not require any special circumstances.

8. The Department notice was published in the Federal Register on XXXXX, Volume XX, Number XXX, page XXXXX.

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

10. If the student 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 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 for the collection of this information is 17,706 hours for 35,411 responses.

We based the number of annual responses on the projected number of students who will receive educational benefits for FY2012 and FY2013, estimated at a total of 885, 273 per year. We estimate that approximately 4% of the total number of VA education applicants will complete this form per year and that each claimant will submit one of these forms per year. VA expects to receive 35,411 annual responses and expects the respondent to use thirty minutes per response in order to gather the information and complete the certification.

Based on 35,411 responses and an average completion time of 30 minutes, the total number of respondent hours will be 17,706 hours at a salary cost of \$15.00 per hour. The cost of the information collection activity is estimated to be \$265,590.

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

14. The annual cost to the government for administering these forms is estimated at \$304,996 based on 35,411 annual responses.

This cost is composed of the following:

a. Processing cost of \$304,180 is based on the salary of an adjudicator (GS-9 step 5 with an hourly salary of \$25.77), a processing time of 20 minutes per response, and a total of 35,411 responses.

b. Administrative and printing costs total \$ 816.

15. There is an increase in burden since the last submission due to the increase in the total number of claimants expected to apply for benefits under the existing VA education programs.

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

17. Not requesting exemption.

18. This information collection fully complies with 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.