

**SUPPORTING STATEMENT FOR VA FORM 22-8979
OMB NUMBER 2900-0465**

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; NCS (National Call to Service) (10 U.S.C., chapter 31, section 510); and the Veterans Retraining Assistance Program (VRAP) of Section 211 of Public Law 112-56.

Section 3680(g) of title 38, U.S.C., states that VA may require proof of continued enrollment. VA Form 22-8979 and the electronic versions of this form are used as this proof. This collection obtains verification of the student's continued enrollment prior to releasing payments. This collection of information is for both college and non-college degree programs.

2. VA uses the information requested by this collection to determine the individual's continued entitlement to benefits. The collection of this information is essential for the administration of these programs. The student is required to submit the verification on a monthly basis to allow for a frequent, periodic release of payment. Without this information, VA could not pay some benefits based on proof of attendance and/or change in enrollment.

3. Information technology is being used to collect the information provided on this form. Individuals receiving benefits under Chapter 33 do not have to verify their attendance. Chapter 30, 1606, 1607 and VRAP respondents must submit this information electronically using either the automated telephone system or the Internet. If the information is provided via the toll-free automated telephone number, it is collected using Interactive Voice Response technology (IVR). If the information is provided via the Internet, it is collected via the Web Automated Verification of Enrollment (WAVE).

Only respondents receiving education benefits under chapter 32 or 35, or section 903, who are enrolled in non-college degree programs receive the paper form. Currently, VA extracts claimant information electronically from education data resources and places it into the appropriate blocks of VA Form 22-8979. VA then sends the printed form to chapter 32 and 35, as well as section 903, respondents during computer generated monthly mailings. In FY2011, about 4% of these individuals in non-college degree programs received the paper form; however, the majority of individuals enrolled in non-college degree programs verify their attendance using the toll-free customer service number (1-888-442-4551) instead of returning the form. The number of respondents who complete and return the paper form is insignificant.

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. The information collection does not involve small businesses or other small entities.
6. Collection of this information on a monthly basis will prevent overpayment of benefits due to late reporting, since payment will not be made until the report of attendance for this benefit has been returned to VA and processed. To collect information less often would preclude VA from making monthly payments under existing regulations.
7. The collection of this information does not require any special circumstances.
8. The Department's notices were published in the Federal Register on January 31, 2012, Volume 78, Number 21, page 6852. No comments were received.
9. VA does not provide any payment or gift to respondents.
10. If a student responds using a paper application, the information provided is retained permanently in the student's education folder. Information provided through the internet showing a change in enrollment status is also retained permanently in the student's education folder. Our assurance of confidentiality is covered by our 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 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 information is 42,313 hours for 2,538,788 responses submitted by 362,684 respondents. The overall average burden per verification continues to be approximately 1 minute per response.

The projected number of students who will receive educational benefits and verify their attendance for Fiscal Years 2013, 2014, and 2015 will be 430,397; 363,442; and 294,213, respectively. VA estimates the number of annual responses will be 362,684 per year and that each respondent will average approximately 1 minute to submit a response through WAVE and IVR. We estimate that each respondent will certify an average of 7 times per year. Based on this response rate, each respondent would spend 7 minutes per year certifying for classes. VA expects to receive 2,538,788 certifications per year from approximately 362,684 respondents for a total of 42,313 hours per year. (362,684 respondents x 7 = 2,538,788 responses x 1 minute/60 minutes = 42,313 total burden hours)

The annual cost to the public is \$634,695, based on 42,313 burden hours times \$15.00.

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

14. The estimated annual cost to the Federal Government is \$286,983 based on 2,538,788 responses and the cost of maintenance for electronically accessible systems.

The following is the annual cost for submissions returned on VA Form 22-8979:

The IVR (toll-free telephone) system is expected to incur a maintenance cost of \$23,730 for FY2013.

VA's Philadelphia IT Center estimates the annual cost of maintaining WAVE as \$97,500.00.

Based on our last submission, a little over 1% of the responses received will report changes in enrollment. No processing is required by a claims examiner if no change in enrollment is reported by the respondent. Changes in enrollment are processed by a claims examiner (GS9/5 with hourly rate of \$25.77 per hour). These changes in enrollment equal a total of 25,388 responses.

We estimate that 60% of these responses will be decreases in enrollment which require a longer processing time of 20 minutes. This will equal a total of 15,233 responses. (15,233 responses X 20 minutes = 304,660 minutes/60 minutes = 5,078 processing hours.)

We estimate that 40% of these responses will be increases in enrollment which require a processing time of 8 minutes. This will equal a total of 10,155 responses. (10,155 responses X 8 minutes = 81,240 minutes/60 minutes = 1,354 processing hours.)

This is a total processing time for the GS9/5 of 6,432 hours at an hourly rate of \$25.77 resulting in a cost to the government of \$165,753.

15. The change in the burden is due to an increase in the number of respondents. Since more individuals are expected to submit claims for VA education benefits so that they may pursue training, we project that there will be a higher number of individuals (or claimants) enrolled in educational training using VA benefits. As a result, we expect an increase in the number of individuals verifying their educational training enrollment to VA.

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

17. Not requesting an exemption.

18. The information collection complies with all 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.