

SUPPORTING STATEMENT FOR 38 U.S.C. § 21.4253(d)
Submission of School Catalog to the State Approving Agency
(2900–0568)

A. Justification.

1. The Supporting Statement for this collection of information was originally entered in the Federal Register, during the 30-day comment period, as an “extension”. This was an error. This has now been corrected and the request has been changed from an “extension” to a “revision”. Also, the Supporting Statement has been updated to include new burdens to the public and the Federal Government. Previously, this was The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans, persons on active duty, reservists, and eligible persons pursuing approved programs of education under chapters 30, 32, 33 and 35, title 38, United States Code, chapters 1606 and 1607, title 10, United States Code, and sections 901 and 903 of Public Law 96-342. These programs may be approved by VA or by divisions of State governments, known as State approving agencies (SAAs), pursuant to a contract VA has with SAAs. Title 38 U.S.C. 3675 requires accredited educational institutions, with the exceptions of elementary and secondary schools, to submit copies of their catalog to the State approving agency when applying for approval of a new course. Title 38 U.S.C. 3676 requires non-accredited institutions to submit at least two copies of their catalog to the State approving agency when applying for approval of a new course. Neither the State approving agencies nor VA can approve such a course until the catalog is submitted. Title 38 CFR, sections 21.4253 and 21.4254, restates this statutory requirement in the Code of Federal Regulations.
2. State approving agencies and VA use the catalogs to determine what courses can be approved for VA training. VA receives catalogs when institutions change their education programs. In general, the catalogs are collected approximately once a year. Without this information, VA and the State approving agencies cannot determine what courses could be approved.
3. The statute requires that the school submit copies of the catalog to the SAA. While many SAAs will accept electronic catalogs, some SAAs may require a hardcopy. VA will accept electronic school catalogs as part of an approval for all educational institutions provided such catalogs comply with individual state requirements. A school's catalog that is submitted electronically must be submitted in a format that is not alterable.
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 schools that want the State approving agency to approve courses are the only sources from which the SAA can obtain their catalogs. This information collection will not have a significant impact on a substantial number of small entities. The burden

cannot be reduced for these entities. The information must be provided for courses being considered for approval regardless of the size of the educational institution.

6. If schools do not submit their catalogs, State approving agencies will be unaware of what new courses schools are offering, and consequently, would be unable to approve them for educational claimants receiving VA education benefits. Educational claimants may not receive VA educational assistance for pursuit of unapproved courses.

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

8. The Department notice was published in the Federal Register on June 17, 2013 Volume 78, Number 116, page 36305. No comments were received in response to this notice.

9. Neither VA nor any of the State approving agencies provides any payment or gifts to respondents.

10. School catalogs are kept by the State approving agencies. These catalogs do not have any confidential information. Schools develop catalogs to give students (and prospective students) knowledge of school rules, regulations and courses offered.

11. Catalogs do not contain information considered to be of a sensitive nature.

12. The estimated annual burden for the collection of this information is 2,404 hours, submitted by approximately 9,614 respondents (schools). At present, we have approximately 9,614 schools approved to offer classroom training.

We continue to consider that an employee of a school will need an average of 15 minutes (one fourth of an hour) to send a catalog to a State approving agency. This number, 9,614 respondents, multiplied by .25 hours yields an estimated annual burden of 2,404 hours.

We estimate that the annual cost to the public for this information collection is \$48,080 based on 9,614 responses. Multiplying 2,404 hours by \$20 per hour (school employee's salary) yields \$48,080.

13. This submission does not involve any recordkeeping costs.

14. The estimated cost to the Federal government is \$0. State approving agencies collect this information as part of their course approval responsibilities. There are no direct costs to VA associated with this information collection. VA contracts with each State approving agency for their course approval services. The costs of this information collection are covered under those contracts.

15. There is a non-significant increase in the number of hours of burden due to the increase in the number of schools offering training approved for VA education benefits.

16. VA does not publish this information or make it available for publication. Schools publish their catalogs. Neither VA nor the State approving agencies republish these catalogs, nor do these agencies make the catalogs available for republishing.

17. The information collection does not display an expiration date.

18. This information collection complies with all requirements under 5 CFR 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.