

## Supporting Statement for VA Form 22-8794

(OMB Control Number 2900-0262)

### **A. Justification.**

1. The law requires educational institutions and job training establishments to designate an official that will be responsible for certifying approved training for Veterans and other eligible persons. Each educational institution must have a VA Certifying Official on staff. The certifying official must submit to VA each student's enrollment information and any changes to such enrollment information. The "Designation of Certifying Official(s)" (VA Form 22-8794) provides VA with the names and signatures of those persons authorized to certify and submit to VA any new hours or changes in the enrollment of their VA students.

Education Service is no longer using the VA Form 22-8794a which was only submitted when an educational institution requested to receive payments electronically and anytime there was a change to an account.

The following administrative and legal requirements necessitate the collection:

A. Titles 38 U.S.C. 3034(a), 3241, 3323(a), 3492, 3680, and 3684(a). 10 U.S.C. 16136(b), and 16166(b)

B. Titles 38 CFR 21.4203(a), 21.5200(d), 21.5292(e)(2), 21.5810(a), 21.7140(a), 21.7652, and 21.7656.

2. VA uses VA Form 22-8794 to maintain a record of the VA Certifying Official responsible for certifying approved training for Veterans and other eligible persons.

3. VA Education Service does not have the ability to accept and validate electronic signatures. As such, we are unable to accept the forms associated with this collection electronically. However, information technology is being used to reduce the burden as the forms associated with these collections are available in an electronically fillable format. Upon completion, an official must sign and submit the forms to VA.

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 burden cannot be reduced for the smaller education institutions. The entries required for this information collection impose only a minimal burden on smaller VA approved facilities, equal to that of the larger institutions.

6. The consequences that would result if this collection was not submitted each time the person filling the position of Certifying Official changes could lead to erroneous student information being reported by someone other than the Designated Certifying Official and could therefore, lead to fraud.
7. The collection of information does not require any special circumstances.
8. The Department notice was published in the Federal Register on November 20, 2013, Volume 78, Number 224, page 69747. No comments were received in response to this notice.
9. VA does not provide any payment or gifts to the respondents.
10. VA Form 22-8794 is retained permanently in the claimant'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 information collected is considered to be of a sensitive nature.
12.
  - a. Number of Respondents – 900
  - b. Frequency of Response – Annually
  - c. Annual Burden Hours – 150 hours
  - d. 10 minutes
  - e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$3,600 (150 hours x \$24.00).
13. The submission of this information collection results in no record-keeping costs.
14. The cost to the Federal Government for administering this form is estimated at \$4,996 based upon 900 total responses.

The processing cost was determined based upon an Education Liaison Representative (ELR) processing 900 responses with a processing time of 10 minutes per response, using an average hourly salary of a GS 11/5 at \$31.17. (900 x 10min/60min x \$31.17= \$4,675.50).

Administrative costs for printing and distribution for this collection is \$100.00.

The mailing cost for VA Form 22-8794 is \$220.50 based on 900 responses at \$.49 (First class stamp \$.46 and \$.03 for each envelope). Since approximately half of these forms are brought to the RPO by the ELR, we estimate only half of the forms require mailing, ( $900/2 \times \$.49 = \$220.50$ ).

15. The change in the annual burden is the result of a decrease in the total number of responses received and the discontinuance of VA Form 22-8794a. The expiration date placeholder has been added to the form.

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

17. We are not seeking approval to omit the expiration date for OMB approval.

18. The collection of this information fully complies with all the requirements of 5 C.F.R. 1320.8(b)(3).

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

This collection of information does not employ statistical methods.