

SUPPORTING STATEMENT
Accelerated Payment Verification of Completion Letter
VA FORM 22-0840
OMB Number 2900-0636

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

The Department of Veterans Affairs (VA) is authorized to pay accelerated education benefits to Veterans and persons on active duty pursuing approved programs of education under chapter 30, title 38, United States Code and chapters 1606 and 1607, title 10, United States Code.

Public Law 107-103 authorized the accelerated payment option under 38 U.S.C. chapter 30, effective October 1, 2002. Public Law 110-181 authorizes the accelerated payment option under 10 U.S.C. chapters 1606 and 1607, effective October 1, 2008. Section 3014A of title 38, and sections 16131a and 16162a of title 10 provide that the Secretary must prescribe regulations including the requirements for the request, certification of receipt, and use of an accelerated payment under these education programs.

38 CFR section 21.7154(d)(1) provides the rules for certification and use of the accelerated payment option under 38 U.S.C. chapter 30. Sections 16131a(f) and 16162a(f) of title 10, United States Code provide the rules for certification and use of the accelerated payment option under chapters 1606 and 1607, respectively. Furthermore, those sections authorize VA to use existing codified regulations for the accelerated payment option under chapter 30 to administer that option under chapters 1606 and 1607. The Accelerated Payment Verification of Completion Letter is used to obtain the certification and use of payment in accordance with the aforementioned statutes.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

VA uses this certification information to implement the regulations regarding receipt and use of the accelerated payment.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also described any consideration of using information technology to reduce burden.

Information technology is helping to reduce the burden. The electronic collection is made via an internet-based application called Veterans Online Application (VONAPP) that collects the same information as the printed VA Form 22-0840. VONAPP allows applicants to submit information directly to the Regional Processing Office (RPO) with jurisdiction over the claim, reducing potential error and speeding the application process.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

A review was 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. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Chapter 30, 1606, and 1607 claimants are the only sources for this information. The information collection does not have any impact on small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

VA would not be able to administer the certification provision of accelerated payment set by law and regulation without this collection.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

Generally, an individual will not request more than one accelerated payment per term. However, some training programs offer short duration high cost courses that last anywhere from a week to several weeks. If an individual enrolls in several short duration courses during a term, it is possible he or she will request more than one accelerated payment. In those instances, we would obtain more than one certification per term.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notice was published in the Federal Register on October 7, 2014, Volume 79, No. 194, pages 60586 and 60587. No comments were received in response to this notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

VA does not provide any payment or gifts to respondents.

10. Describe any assurance of privacy to the extent permitted by law provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

After processing, the claimant's information is retained in his or her education record. We periodically destroy these records. If a claimant's education record is destroyed, all documents contained in that record are also destroyed. Privacy to the extent permitted by law is covered by VA System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records—VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2009.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No information is considered to be of a sensitive nature.

12. Estimate of the hour burden of the collection of information. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.

The total estimated annual burden to the public for this information collection is 9 hours for 108 respondents.

a. Number of Respondents: 108

b. Frequency of Response: on occasion

c. Annual Burden Hours: 9 hours

d. Estimated Completion Time: 5 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 \$216 (9 burden hours x \$24 per hour).

We projected the number of accelerated payments that VA will make in future years by using the data from the FY 2011, FY 2012, and FY 2013 Presidential Budget Submissions.

We believe that each claimant will use an average of 1 accelerated payment per year.

The law requires respondents to furnish any increase or decrease in hours of pursuit, whether or not the course was successfully completed, and an explanation of how the accelerated payment was used. VA estimates that a respondent would need approximately 5 minutes to complete this letter. Based on a cost of \$24.00 per hour, for 9 hours, the cost to the public in burden hours is \$216.00.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

VA estimates that the total annual cost to the government for administering applications for accelerated program is \$1461.16 annually.

a. We estimated the time to process and mail certifications to respondents will be (GS 9/5 @ \$26.02 x 108 x 30 minutes/60= \$1,405).

b. We estimated the cost for postage will be (\$.49 each for postage + \$.03 per envelope = \$.52 each x 108 certificates = \$56.16).

c. Total: \$1,461.16

15. Explain the reason for any burden hour changes since the last submission.

This submission reflects a reduction in burden to the public due to the decreased number of individuals requesting accelerated payments. The expiration date placeholder has been added to the form.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information is not for publication or tabulation.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA will display the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

The data collection does not employ statistical methods.