

**SUPPORTING STATEMENT FOR V A FORM 22-0803, APPLICATION FOR
REIMBURSEMENT OF LICENSING OR CERTIFICATION TEST FEES
(2900-0695)**

A. Justification.

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

Statute requires that an individual who desires a benefit the Department of Veterans Affairs (VA) administers must apply to VA for that benefit (38 U.S.C. 5101(a)). The collection of information is necessary to apply 38 U.S.C. 5101(a) and 38 U.S.C. 3689 (which is applicable pursuant to 38 U.S.C. 3034(a), 3241(a), 3323, 3471, and 3513) to claims for educational assistance for licensing or certification tests under the various educational assistance programs VA administers.

This submission represents a revision of an existing collection. Due to the enactment of Title V of Public Law 110-252, it is necessary to provide individuals eligible for chapter 33 the ability to apply for reimbursement of licensing or certification test fees.

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 will use the information collection specific to licensing or certification test reimbursement to decide whether the claimant should be paid educational assistance for taking a licensing or certification test and the amount the claimant should be paid.

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 or responses, and the basis for the decision for adopting this means of collection). Also describe any consideration of using information technology to reduce burden.

Information technology is not being used to reduce the information collection burden. Although this form is available electronically, it is not currently available in a fillable format. VA is working to provide a system that will allow individuals to file all claims electronically.

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

VA is not aware of any duplication of this information collection.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB form 83-1) describe any methods used to minimize burden.

The collection of information will not have a significant impact on a substantial number of small entities. Only individuals will supply this information.

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.

If VA does not collect this information, we will not be able to determine who is eligible for reimbursement of licensing or certification test fees or the amount that should be paid to those who are eligible.

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 OPM.

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

8. a. 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 prior to submission to OMB. Summarize public comments received in response to the notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on the cost and hour burden.

The Department notice was published in the Federal Register on October 2, 2014, Volume 79, No. 191, page 59558. No comments were received in response to this notice.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and record keeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances that preclude consultation every three years with representatives of those from whom information is to be obtained.

No outside consultations were made.

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

VA does not provide any 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, regulations, or agency policy.

VA Form 22-0803 is retained in the student's education file. Information will be protected as described in the system of records notice, Compensation, Pension, Education and Vocational Rehabilitation Records – VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2011 Compilation.

11. Provide additional justification for any questions of a sensitive nature 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.

None of the information collected is of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

The estimated annual burden is 408 hours. The annualized cost to respondents is \$9,792.

- a. The number of respondents: 1,631
- b. Frequency of response: 1 annually
- c. Annual Burden Hours: 408
- d. Estimated completion time: 15 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 \$9,792. (408 burden hours X \$24 per hour).

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

This information collection does not involve any record keeping 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 aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost to the government for administering this form is estimated to be \$14,146.

a. The processing cost of \$37,386.67 is based on an estimate that a GS 9/5 employee earning \$26.02 will have to review each application. We estimate that it will take 20 minutes to review 1,631 claims. $1,631 \times \$26.02 \times 20/60 = \$14,146$.

b. There are no administrative costs associated with forms for this information collection because the Code of Federal Regulations does not require the use of a VA Form.

15. Explain the reason for any program changes or adjustment reported in Items 13 or 14 of OMB 83-1.

The decrease in annual burden is due to the majority of eligible individuals seeking reimbursement were those individuals receiving Post-9/11 GI Bill benefits -which allowed the reimbursement of only one test. The expiration date is being 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.

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

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

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

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submission,” of OMB 83-1.

This information collection fully complies with the requirement of 5 CFR 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods

No statistical methods are used in this data collection.

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.