

SUPPORTING STATEMENT FOR VA FORM 22-1999b
Notice of Change in Student Status
(2900–0156)

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans, persons on active duty, reservists, and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35 of title 38, United States Code; chapters 1606 and 1607 of title 10, U.S.C.; sections 901 and 903 of Public Law 96-342; the National Call to Service Provision of Public Law 107-314; and the “Transfer of Entitlement” Provisions of Public Laws 107-107 and 110-252. Benefits are not payable when pursuit of a program is interrupted or terminated, or is not completed according to the regularly established policies and regulations of the educational institutions. Educational institutions are required to report without delay to VA, in the form prescribed by VA, the interruption or termination, or a finding of unsatisfactory attendance, progress, or conduct. VA Form 22-1999b serves as this report to VA of such changes in enrollment status.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3020, 3034(a), 3241, 3323(a), 3474, 3524, 3680(a), 3684(a);
10 U.S.C. 510, 16136(b), and 16166(b).
 - b. 38 Code of Federal Regulations 21.4203, 21.5200(d), 21.5292(e)(2), 21.5812, 21.7156, 21.7656, 21.9720, and 21.9725.
2. VA uses the information collected to determine whether the eligible person’s educational benefits should be increased, decreased, or terminated, and the effective date of the change, if applicable. Without this information, VA might underpay or overpay benefits.
3. Information technology is being used to reduce the burden. VA allows schools to submit the information using VA Online Certification of Enrollment (VA-ONCE). The majority of enrollment certifications received are submitted electronically.
4. VA is not aware of any duplication of this information collection.
5. Educational institutions providing training are the only sources for this information. The change in this information collection will not have a significant impact on a substantial number of small entities and the existing burden cannot be reduced for these entities. The information must be provided in a uniform, consistent fashion regardless of the size of the educational institution for those students who have changes in their enrollments.

6. If this information is not collected, eligible persons may be underpaid or overpaid. If the information is collected less frequently, it would impair VA's ability to prevent overpayments and under-payments of educational benefits.
7. The collection of this information does not require any special circumstances.
8. The Department notice was published on October 7, 2014, Vol. 79, No. 194 page 60585. No comments were received from the public in response to this notice.
9. VA does not provide any payment or gifts to respondents.
10. VA Form 22-1999b is retained permanently in the claimant's electronic education folder. The information will be protected as described in the 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 information collected is considered to be of a sensitive nature.
12. The estimated annual burden for the collection of the information is determined as follows:
 - a) Average Number of Respondents: 546,517
 - b) Frequency of Response: 1 response per respondent annually
 - c) Annual Burden Hours: 91,086
 - d) Estimated Completion Time: 10 minutes
 - e) There is no estimated annual cost to the public as costs incurred are offset by school reporting fees paid by VA. 38 U.S.C. 3684 directs VA to pay each institution \$11 for each student certified or \$15 for any students certified for advance payment during the calendar year. Therefore, the annual cost to schools that submit responses electronically is estimated to be \$2,186,064 based on 91,086 hours based on the respondents' cost of \$24 an hour. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.
13. This submission does not involve any record keeping costs.

14. The Annual Cost to the Government for administering this form is estimated at \$2,370,062. VA estimates it will take a GS 9/5 Claims Examiner (paid \$26.02 per hour) 10 minutes to process each response (546,517) equaling \$2,370,062.

15. The change in the annual burden is due to the increase in the number of VA Form 22-1999b, Notice of Change in Student Status received. The majority of schools are submitting the information on-line using VA On-line Certification of Enrollment (VA-Once). The expiration placeholder has been added to the form.

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

17. VA is not seeking an exemption from displaying the expiration date on VA Form 22-1999b.

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

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.