

**SUPPORTING STATEMENT FOR VA ENROLLMENT CERTIFICATION,
VA Form 22-1999
OMB Number 2900-0073**

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 educational benefits to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C., section 510 and chapters 1606 and 1607, title 10, U.S.C., and sections 901 and 903 of Public Law 96-342. Educational institutions and training establishments are required to use the VA Form 22-1999, Enrollment Certification, to report to VA, without delay the information concerning the enrollment or reenrollment into the training of Veterans, service persons, reservists, and other eligible individuals. In certain instances, the enrollment certification is used by VA to authorize and make payments in advance if the trainee requests an advance payment. In other instances, VA is authorized to make lump sum payments of up to 60% of a claimant's tuition and fees if the trainee requests an accelerated payment. In these cases, VA Form 22-1999 serves as the trainee's request for an accelerated payment as well as for the educational and/or training institution's report of the trainee's enrollment.

The following administrative and legal requirements necessitate the collection:

- A. 38 U.S.C. 3034, 3241, 3323, 3680; and 3684, 10 U.S.C. 16136, and 16166
- B. 38 CFR 21.4203, 21.5200(d), 21.7152, 21.7652, and 21.9720

The correct estimated annual burden is 474,814 hours. The 30 day Federal Register Notice (FRN) erroneously shows the estimated annual burden as "747,814 hours".

- 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 the information collected on VA Form 22-1999 to determine the amount of educational benefits payable to the trainee during the period of enrollment or training. Additionally, VA also uses these forms to determine

whether the trainee has requested an advance payment or accelerated payment of benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting an advance or 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 describe any consideration of using information technology to reduce burden.**

Information technology is being used to reduce the burden. VA allows schools to submit the information using VA Online Certification of Enrollment through (VA-Once). The majority of enrollment certifications received are submitted electronically.

- 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.**

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

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The educational institutions and job training establishments providing training are the only sources for this information. The information collection burden cannot be reduced for small educational institutions or job training establishments. The form must be submitted for any student receiving benefits under VA education programs. The information provided must be uniform and consistent regardless of the size of the educational institution or job training establishment.

- 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 pay benefits for training if this information were not collected.

- 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.

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

- 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, Number 194, page 60584. 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 payments 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.**

If the school responds, the information provided is retained permanently in the student's education folder. Our assurance of privacy 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 is contained in the Privacy Act Issuances, 2011 Compilation.

- 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.**

None of the information collected is considered to be of a sensitive nature.

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

- a. The number of respondents: 1,424,443
- b. Frequency of response: 2 annually
- c. Annual Burden Hours: 474,814
- d. Estimated completion time: 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 \$11,395,536. This total annual public burden cost is offset by school reporting fees paid by VA.

The estimated annual burden for the collection of the information is 474,814 hours. 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.

VA received responses from approximately 9,000 schools from FY 2012 through FY 2013. Historically, VA has received an average of 2 enrollment certifications (responses) for each trainee each year. VA estimates that an average of 1,424,443 students will train each year from FY 2014 through FY 2015 resulting in approximately 2,848,886 responses each year based on the receipt of two submissions per year, per student.

Based on an estimated receipt of 2,848,886 responses as indicated above, the annual burden is 474,814 hours.

This total annual public burden cost of \$11,395,536 is offset by school reporting fees paid by VA. VA pays each school that furnishes training under various education programs a fee for processing all required VA reports or certifications for each trainee. These fees help defray the costs of processing paperwork and are provided in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967, and have been increased per Public Law 111-377 effective October 1, 2011. These reporting fees provisions are codified in 38 U.S.C. 3684. As a result, there is no additional cost to the public for this information collection.

- 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 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 estimates from Items 12, 13, and 14 in a single table.**

The Annual Cost to the Government for administering this form is estimated at \$24,709,338. VA estimates it will take a GS 9/5 Claims Examiner (paid \$26.02 per hour) 20 minutes to process each response (2,848,886) equaling \$24,709,338 in administration costs.

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

The change in the annual burden is due to the overall increase in the number of trainees using the Post-9/11 GI Bill, thus, it reflects the change due to adjustment in the agency estimate. The increase is also reflected as a result of an increase to the hourly wage of VA Claims Examiners VCE's processing each submission. The expiration date has also 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.**

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

- 17. If seeking approval to not display 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 Submissions," of OMB 83-I.**

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

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B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.