

**SUPPORTING STATEMENT FOR  
VA Form 22-0839, YELLOW RIBBON AGREEMENT  
(2900-0718)**

1. Public Law 110-252 authorizes the Department of Veterans Affairs (VA) to administer an education benefit program known as the Post-9/11 GI Bill. Section 3317 of title 38, United States Code, establishes the Yellow Ribbon G.I. Enhancement Program, referred to as the "Yellow Ribbon Program." The Yellow Ribbon Program allows institutions of higher learning (IHLs) to voluntarily enter into an agreement with VA to waive a portion of the outstanding amount of established charges not otherwise covered under the Post-9/11 GI Bill. VA will match the amount waived by the IHL; however, VA's portion will not exceed fifty percent of the total outstanding amount of established charges. IHLs wishing to participate in the Yellow Ribbon Program are required to submit the Yellow Ribbon Program Agreement (VA Form 22-0839) indicating the maximum number of students that will receive benefits under the program, the maximum dollar amount of outstanding established charges that will be waived for each student based on student status (i.e., undergraduate, graduate, doctoral) or sub-element (i.e., college or professional school), and the way in which the contribution will be given (i.e., direct grant, scholarship, or other).

Title 38 U.S.C. 3317 necessitates this collection of information.

2. VA will use the information collected to determine which IHLs will be participating in the Yellow Ribbon Program, the maximum number of individuals for whom the IHL will make contributions in any given academic year, the maximum dollar amount of outstanding established charges that will be waived for each student based on student status (i.e., undergraduate, graduate, doctoral) or sub-element (i.e., college or professional school).

3. At this time, information technology cannot be used to reduce the burden. VA does not have the technology to obtain signatures electronically and cannot require all schools to use information technology to submit this information.

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. Collection of this information will not have an impact on small businesses or other small entities. Participation in the Yellow Ribbon program is voluntary; therefore, IHLs are not required to submit this information to VA.

6. If the information is not collected, VA will not be able to administer the provisions of the Yellow Ribbon Program as mandated by statute.

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

8. The Department notices were published in the Federal Register on October 7, 2014, Volume 79, Number 194, page 60586. One comment was received from the public in response to this notice. The commenter sought clarification whether there had been any changes/revisions to VA Form 22-0839. A response was provided to commenter with information that no changes have been made to this form and that VA is seeking OMB approval of the renewal of this form.

9. VA does not provide any payment or gifts to respondents.

10. The form used to collect this information does not require any sensitive or private data. Title 38 U.S.C. 3317 requires that the information collected be made available to the public via a website; therefore, there is no implied assurance of confidentiality. Information provided on the form will be available for viewing via a link at VA's Education Service website ([www.GIBILL.va.gov](http://www.GIBILL.va.gov)).

11. None of the information collected is of a sensitive nature.

12. The total estimated burden to the public for this information collection is 31,710 hours, with submissions by 2,265 respondents. The estimated cost to the public is \$475,600

a. Number of Respondents: 2,265

b. Frequency of Response: Once

c. Annual Burden Hours: 31,710 hours

d. Estimated Completion Time: 14 hours

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 \$761,040 (31,710 burden hours x \$24 per hour).

VA received an average of 2,265 agreements each year over the last three years. Based on a survey of schools it was determined that it takes approximately 14 hours to gather the materials, review necessary information, and complete the Yellow Ribbon Program agreement.

13. This submission does not involve any record keeping costs.

14. The estimated cost to the Federal government is \$54,790. VA calculated this amount as follows:

Completed Agreement Forms Processed by VA:

We estimate the processing time for each Yellow Ribbon Agreement will be 30 minutes by a GS 13/5 employee in Washington, DC with an hourly wage of \$48.38. The cost will be \$54,790.

15. The increase in the annual reporting burden is due to additional schools submitting the Yellow Ribbon Program Agreement. The expiration date is being added to the form.

16. VA will post the Yellow Ribbon Agreement form to the GI Bill website by the second week of March in each calendar year. The deadline for completed agreements to be received by VA is May 15th of each calendar year (or the next business day if the 15th is a Saturday or Sunday). VA will publish the terms of the agreement via a link at [www.GIBILL.gov](http://www.GIBILL.gov).

17. VA is not requesting an exemption from displaying the expiration date on this form.

18. This information collection fully complies with all the requirements of 5 CFR 1320.8(b)(3) and 1320.9.

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

This collection of information by the Veterans Benefits Administration does not employ statistical methods.