

**SUPPORTING STATEMENT FOR VA FORMS 22-1990, 22-1990E
and 22-1990N
OMB NUMBER 2900-0154**

A. Justification.

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

In order to receive VA Educational Assistance Allowance under chapters 33 and 30 of title 38, U.S.C., chapters 1606 and 1607 of title 10, U.S.C., and sections 901 and 903 of Pub. Law 96-342, veterans, servicepersons, and reservists must complete VA Form 22-1990, Application for Education Benefits or VA Form 22-1990E, Application for Family Member to Use Transferred Benefits or VA Form 22-1990N, or the Application for VA Education Benefits Under the National Call to Service (NCS)

The following administrative and legal requirements necessitate the collection: 38 U.S.C. 3034; 3241, 3323(a), 3471, 5101(a); Pub. Law 96-342, sections 901 and 903; 10 U.S.C. 16136(b), and 16166(b).

- 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.**

The claimant uses the VA Form 22-1990 to submit an initial (or "original") claim for VA education benefits. The information requested on this form helps VA determine the applicant's eligibility to education benefits. In order to streamline the application process for the claimants, the VA has expanded the initial application to include two additional programs: (1) Application for Family Member to Use Transferred Benefits (VA Form 22-1990E); and (2) Application for VA Education Benefits Under the National Call to Service (NCS) Program

- 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. Claimants have the option of using VONAPP (Veterans On-Line Application) to submit the information via the Internet. Additionally, we have converted these forms into an electronic fillable format available on the Internet. VA estimates that 70% of claimants submit

the forms via VONAPP.

- 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.**

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 the Department.

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

The collection of information does not involve small businesses or 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.**

If this information is not collected or is collected less often, VA would not be able to pay education benefits. There are no technical or legal obstacles to reducing the burden.

- 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 3 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 statistical data classification that has not been reviewed and approved by OMB.**

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

- 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 December 17, 2015 Volume 80, No. 242, Pages 78820-78821. An anonymous comment was received on May 4, 2016. The comment was a brief one word expression ("Good") of appreciation therefore a response from the VA was not warranted.

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

No payments or gifts to respondents have been made under this collection of Information.

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.

VA Education Service's assurance of confidentiality is covered by the VA System of Records, Compensation, Pension, Education, Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) which are contained in the Privacy Act Issuances, 2012 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.

There are no questions on the applications of a sensitive nature.

12. Estimate of the hour burden of the collection of information: Please show mathematical calculations:

Estimate of the Information Collection Burden.

A. Number of Respondents: 859,522

- VA Form 22-1990 consists of 859,128 responses received via (Paper & VONAPP) for 2013, 2014 and 2015 rendering a total of 214,783 burden hours. Formula = $12 \times d / 60 = c$ for burden hours.
- VA Form 22-1990N consists of 37 responses received via (VONAPP) for 2013, 2014 and 2015 rendering a total of 9 burden hours. Formula = $12 \times d / 60 = c$ for burden hours.

- VA Form 1990E consists of 357 responses received via (VONAPP) for 2013, 2014 and 2015 rendering a total of 89 burden hours. Formula = $12aXd/60=c$ for burden hours.

B. Frequency of Response: One Time

C. Annual Burden Hours: 214,881 ($859,522 \times 15 / 60 = 214,881$)

D. Estimated Completion Time: 15 minutes

E. The respondent population is composed of Veterans and their dependent student. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics gathers information on full-time wage and salary workers. Accordingly, the median weekly earnings of full-time wage and salary workers is \$929.20. Assuming a forty (40) hour work week, the median hourly wage is \$23.23.

The general wage code of 00-000-0000 for "All Occupations," May 2015, may be found by clicking this link:

http://www.bls.gov/oes/current/oes_nat.htm#00.0000.

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$4,991,686 (214,881 burden hours x \$23.23 per hour).

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.

Estimated Costs to the Federal Government:

A. The estimated annual cost to the Federal Government for administering this collection of information is **\$19,404,412** based on 859,522 responses annually.

For the approximate 293,786 applications submitted on paper, a GS 4 step 5 clerk who earns \$13.31 per hour scans the paper form into The Image Management System (TIMS), an electronic file system. This step should take approximately 5 minutes per application. 5 minutes times 293,786 responses gives a total of 24,482 hours.

The cost to the government for scanning the paper forms at \$13.31 per hour totals \$325,855 ($\$13.31 \times 24,482$). After scanning, each application is processed by an adjudicator working at the GS 9 step 5 rate (\$22.57). The adjudicators will need approximately 40 minutes to process each claim (40 minutes x 859,522 responses = 573,015 Hours). The cost to the government for processing all 859,522 at \$22.57 = \$19,399,412.

VA also incurs a yearly maintenance cost for the Veteran On-line Application, (VONAPP) of \$5,000.

B. Forms are available on the VA inter/intranet forms websites.

C. Printing and production cost is not applicable since forms are available on web.

D. Total cost to government - **\$19,404,412**

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

There is a slight increase in burden hours due to an increase in the number of applications/responses received. The VA Form 22-1990R (Veterans Retraining Assistance Program) was once being used to report the burden information using this collection. We no longer provide services under the VRAP program because the program terminated on March 31, 2014 and the burden was reported during the last submission. Therefore, the burden hours in this collection does not contain any uses of application completion time for this collection using the VA Form 22-1990.

The expiration date placeholder has been added to the forms.

The VA Form 22-1990 is being revised to include edits to Part II of the form to "state that the effective date for benefits for training under the Chapter 33 program are **not** payable prior to that election date." Item 10d has also been added to the application based on Section 702, which asks the claimant if they will be living in the same state during training. Item 9F is being updated to tell the veteran that he or she **MUST** check a box for the benefit being relinquished, and that **not** checking

the box will delay the claim.

- 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 collection is not for publication or tabulation use.

- 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.

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.