

**SUPPORTING STATEMENT FOR VA FORM 22-5281**  
**Application for Refund of Educational Contributions**  
(OMB Control Number 2900-0261)

**A. Justification.**

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

Public Law 94-502 established the Post-Vietnam Era Educational Assistance Program (VEAP). The VEAP program account is jointly funded by the eligible participant and the Department of Defense. The fund provides educational assistance payments to eligible participants who entered the service after December 31, 1976, and before July 1, 1985, and are pursuing training under Chapter 32, title 38 U.S.C.

VA Form 22-5281, Application for Refund of Educational Contributions, is required to process a refund of contributions made by program participants who wish to disenroll from the program. If a participant stops enrollment from the program prior to discharge or release from active duty, such participant's contributions will be refunded on the date of the participant's discharge or release from active duty or within 60 days of receipt of notice by the Secretary of the participants' discharge. If a participant stops enrollment from the program after discharge or release from active duty, the participant's contributions shall be refunded within 60 days of receipt of an application for a refund from participant.

**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 current information collection to properly identify and refund the amount currently being held in the Post-Vietnam Era Veterans Education account to the qualifying Veteran.

**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.**

VA Form 22-5281 is available in an electronic fillable format on the Internet. The form cannot be submitted electronically at this time, as a signature is required.

**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 our Department.

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

There is no impact on education institutions or small businesses.

**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.**

Without the information submitted on VA Form 22-5281, we would be unable to refund to the participant the amount which is currently being held in the Post-Vietnam Era Veterans Education account.

**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 Wednesday, May 11, 2016, Volume 81, Number 91, page 29327. 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 payment 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.**

VA Form 22-5281 is retained permanently in the claimant'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 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**

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

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

Estimate of Information Collection Burden.

- a. Number of Respondents: 461
- b. Frequency of Response: Annually. The approximate number of responses received per year is 1 response. [461 X 10 / 60 = 77 annual burden hours].
- c. Annual Burden Hours: 77
- d. Estimated Completion Time: 10 minutes
- e. The respondent population is composed of Veterans who are students.

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 worker

is \$929.20. Assuming a forty (40) hour work week, the median hourly wage is \$23.23 based on the BLS wage code— “00-0000 All Occupations” in the latest available BLS Current Population Survey (CPS), dated May, 2015. This is the link that supports this latest information; [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)

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 \$1,789 (77 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.**

The annual cost to the government for administering these requests is estimated at \$1,022 based on 461 annual responses. This cost is determined as follows:

- a. The processing cost of \$1,022 is based on an estimate that a GS 9/5 employee will have to review each application. The salary for such an employee is \$26.59 per hour. We estimate it will take 5 minutes to review each claim. (461 claims x \$26.59 x 5 min /60 min = \$1,022)
- b. There are no administrative costs associated with this information collection.

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

The public burden in hours has decreased because of the diminishing need of VEAP disenrollment refunds since there have been no new enrollees to VEAP.

**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 information collection fully complies with all the requirements of 5 Code of Federal Regulations 1320.8(b)(3).

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

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