

**SUPPORTING STATEMENT FOR  
APPLICATION FOR EDUCATIONAL ASSISTANCE  
TO SUPPLEMENT TUITION ASSISTANCE, 38 CFR 21.1030(c), 21.7140(c)(5)  
(OMB 2900-0698)**

**A. Justification**

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

Statute (38 U.S.C. 5101(a)) requires that an individual who desires a benefit that the Department of Veterans Affairs (VA) administers must apply to VA for that benefit. The collection of information is necessary to apply 38 U.S.C. 501 (a), 3014(b), 3034(a), 3313(e) and 5101(a) to claims for educational assistance under the Montgomery GI Bill-Active Duty (Chapter 30) and the Post-9/11 GI Bill (Chapter 33) to supplement tuition assistance provided under a program administered by the Secretary of a military department.

**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 will use the information to decide whether the claimant should be paid educational assistance to supplement the tuition assistance he or she has received, and if he or she should be paid, the amount to be paid to the claimant.

**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.**

Applications for educational assistance are filed electronically using VA's online application (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 our 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 will not have a significant impact on a substantial number of small entities. Only individuals are required to supply this information.

**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 VA does not collect this information, it would be impossible to know who is eligible for educational assistance to supplement tuition assistance, and the amount that should be paid to those who are eligible.

**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 (Insert Date) (Volume\_\_\_, No. \_\_\_) (page/pages) (Insert Page Number(s)). (No or number) 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 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.**

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 of a sensitive nature.

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

Estimate of Information Collection Burden:

- a. Number of Respondents: 8,000
- b. Frequency of Response: On occasion.
- c. Annual Burden Hours: 1,600 [8,000X12/60=1600 annual burden hours].
- d. Estimated Completion Time: 12 minutes
- e. The respondent population consists of veterans who are pursuing approved programs of education. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as educational background and wage potential of respondents. Therefore, VBA used general wage data for “All Occupations” 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” dated Jan, 2017 may be found by clicking this link: [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://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 \$37,168.00 (1600 burden hours X \$23.23 per hour).

The total estimated cost to the schools is \$40,000 (1600 hours multiplied by a respondent's cost of \$25 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 information collection does not involve any reporting or record keeping costs above those identified in item 12.

**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.**

VA estimates that the total annualized cost to the government to collect the information required by §§ 21.1030(c) and 21.7140(c)(5) is \$72,053. This cost is computed as follows.

Estimated Costs to the Federal Government: \$72,053

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
09	05	1600	27.02	--	8000	\$72,053
--	--	--	--	--	--	--
Overhead at 100% Salary						72,053
<b>Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.</b>						
Processing / Analyzing Costs (No Adm. Cost)						\$0
Printing and Production Cost						\$0
Total Cost to Government						\$0

There are no administrative costs associated with this information

collection since the statute necessitating this collection of information does not require the use of a VA form.

**Note:** The hourly wage information above is based on the hourly 2017 General Schedule (Base) Pay [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/RUS_h.pdf). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of the grade level spend to process to completion a claim received on this form.

REPORTING FEE INFORMATION: There is no cost to schools because VA pays each school that furnishes training under the various VA education programs a fee for processing all required VA reports or certifications for each veteran or other claimant. VA refers to these fees as "school reporting fees" which help schools to defray the costs of processing paperwork required to be submitted to VA. The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967 and are in 38 U. S. C. 3684

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

There is a decrease in the annual burden as a result of the decreased number of requests received for educational assistance to supplement tuition assistance.

**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 complies with all requirements under 5 CFR 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.