

**SUPPORTING STATEMENT FOR
CERTIFICATE OF DELIVERY OF ADVANCE PAYMENT AND ENROLLMENT
(2900-0325)**

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits and retraining assistance to veterans and other eligible individuals pursuing approved programs of education. When certain requirements are met, VA is authorized to issue payments in advance of the beginning date of training under chapters 30, 32, 35 of title 38, U.S. Code, chapters 1606 and 1607 of title 10, U.S. Code, section 903 of Public Law 96-342, and the Veterans Retraining Assistance Program (VRAP) of Public Law 112-56. The schools deliver advance payments to the individual and are required by law to certify to the VA that these deliveries were made. The schools are also required to report the following to VA: the failure of a student to enroll; an interruption or termination of attendance; or a finding of unsatisfactory attendance, conduct or progress.

The following statutes and regulations require this information collection:

a. 38 U.S.C. 3034, 3241, 3531, 3680(d), 3684

b. 10 U.S.C. 16136(b), 16166(b)

c. 38 C.F.R. 21.4138a, 21.4203(a) and (d), 21.5135, 21.5200(d), and 21.5292(e)(2), 21.7151(b), and 21.7640(d)

2. VA uses information from the current collection at the beginning of the school term to ensure that advance payments have been delivered and to determine whether the student has increased, reduced, or terminated training.

3. Information technology is not being used to reduce the information collection burden because VA is not currently able to accept electronic signatures 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. Each educational institution that accepts advance payments on behalf of students are required by statute, regardless of the size of the institution, to submit a certification of delivery. The form must be submitted for any student that receives the advance payment. For that reason, the information collection cannot be reduced for small establishments.

6. Collecting this information is done after the school delivers the advance payment to the student. Delivery of advance payment cannot be confirmed without a completed form. The collection of information prevents an overpayment or underpayment of benefits. If the information was not collected or collected irregularly, VA would be unable to prevent erroneous payments.
7. The collection of this information does not require any special circumstances.
8. The Department notice was published in the Federal Register on February 26, 2013, Volume 78, Number 38, page 13159. No comments were received in response to this notice.
9. VA does not provide any payments or gifts to respondents.
10. VA Form 22-1999V is retained permanently in the claimant's education folder. Our assurance of confidentiality 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, 2011 Compilation.
11. None of the questions on this form are considered to be of a sensitive nature.
12. The estimated annual burden for the collection of this information is 58 hours based on 700 responses. The estimated number of respondents (schools) is 159. We continue to estimate the school will need approximately five minutes to complete and process each VA Form 22-1999V.

This estimate is determined as follows:

- a. Approximately 566 students received advance payments in FY2012. Consistent with the Presidential Budget Submission, VA expects to receive an average of 700 responses annually over the next three years.
- b. On average we receive 4.4 responses from each school. Based on this average, we project that 700 responses will be received from approximately 159 schools. Update- the burden information posted in the 60-day and 30-day Federal Register Notices was incorrect and has been updated to include the correct annual burden of 58 hours.

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

14. The annual cost to the Government for administering the form is estimated to be \$3,849 based on 700 responses annually. This cost is determined as follows:

- a. We estimate that 630 (90%) of the responses received will not require a change in the student's enrollment. It takes approximately 5 minutes to process forms with no change. No change forms are processed by employees in the Finance division with an average salary of \$15.20 (GS 4, step 5). It will take approximately 53 hours to process all forms received resulting in a processing cost of \$806.00
- b. We estimate that 70 (10%) of the responses received will require a change in the student's enrollment. It takes approximately 20 minutes to process forms that indicate a change in enrollment. Change forms are processed by employees in the Education division with an average salary of \$25.77 (GS 9, step 5). It will take approximately 23 hours to process all forms received resulting in a processing cost of \$593.00
- c. In accordance with 38 USC 3684 schools receive \$12 for each student certified without advance payment and \$15 for each student certified with an advance payment. The net amount paid to schools for an advance payment is \$3 per student (\$15 - \$12). We estimate that \$2100 (700 x \$3) of the total amount of reporting fees paid each year will be attributable to advance payment certifications.
- d. The administrative cost is \$350. This amount was determined by multiplying \$.50 (printing and distribution costs) by 700.

15. The requested burden estimate of 58 hours represents a significant change from the 35 hours reported in the previous submission because of the implementation of the Veterans Retraining Assistance Program (VRAP). VRAP is a temporary program that was recently implemented on July 1, 2012 and will end on March 31, 2014. We expect that the burden will decrease significantly after March 31, 2014 since VRAP will have ended.

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

17. The collection instrument, VA Form 22-1999v, may be reproduced and/or stocked by respondents and veterans organizations. Requiring VA to display an expiration date on the form would result in unnecessary waste of existing stocks. Inclusion of the expiration date could also result in a delay of the Department's action on the benefit being sought (respondent trying to obtain a newer version, while VA would have accepted the older version). For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date.

B. Collection of Information Employing Statistical Methods

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