

SUPPORTING STATEMENT FOR VA FORM 22-315
OMB 2900-0118
VA Form 22-315

A. Justification

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

The Department of Veterans Affairs (VA) is authorized to pay education benefits to individuals pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C.; chapters 1606 and 1607 of title 10, U.S.C.; Section 903 of Public Law 96-342; and the NCS (National Call to Service) (10 U.S.C., chapter 31, section 510). This information collection is necessary when a student is receiving Department of Veterans Affairs (VA) education benefits while enrolled at two training institutions at the same time. The institution at which the student pursues his approved program of education must verify that courses pursued at a second or supplemental institution will be accepted as full credit toward the student's course objective. Educational payment for courses pursued at the second institution is not payable unless evidence is received to verify that the student is pursuing his or her approved program while enrolled in these courses. VA Form Letter 22-315 serves as this certification of acceptance of credit.

VA Form Letter 22-315 is sent to the student by a VA claims examiner in cases where this information is not already established or included in the applicant's file. The letter directs the student to have the certifying official of the primary institution complete the information on the reverse side of the form. The certifying official at the primary institution uses the letter to list the course or courses pursued at the secondary institution for which the primary institution will give full credit. Copies of the letter are sent to both the primary and secondary institutions. The certifying official at the primary institution sends the completed letter to the VA regional office. The certifying official may also send the information electronically using the VA-ONCE system. The claims examiner then determines whether education benefits can be authorized for these courses based on this information. Without this information, benefits cannot be authorized for any courses pursued at any institution other than the primary institution.

The following administrative and legal requirements necessitate the collection:

A. 38 U.S.C. 3002(3), 3014, 3202(2), 3231(a)(3), 3301(3), 3452(b), 3501(a)(5), 3531(a); 10 U.S.C. 16136(b), 16161, 16166(b), and section 510 of chapter 31

B. 38 CFR 21.4233(b), 21.5070, 21.5131, 21.7070, 21.7630, 21.9620

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 has used information from the current collection to ensure that claimants are pursuing their approved program while enrolled at a supplemental school. Without this information, VA might underpay or overpay benefits.

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 helping to reduce the burden. We estimate that 80% of this information will be delivered through the VA-ONCE system. VA-ONCE is the electronic information system currently being used by education institutions to report education activity at the education facility.

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 does not involve small businesses. The information collection does not have a significant impact on a substantial number of small schools. It cannot be reduced for small enrollment schools as the information collected is required by statute. The form must be submitted for any student receiving VA educational benefits who pursues a course at a school other than the school from which he or she plans to receive an approved degree. The information to be provided must be uniform and consistent regardless of the size of the school. This form letter requires minimal input from school officials. The school or training institution is required to complete only three items (course designation and title, signature and title of certifying official, and date) on the Form Letter 22-315.

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 might underpay or overpay 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 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.

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 June 22, 2016, Volume 81, No. 120, pages 40770-40771. No comments were received.

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.

If the student responds, the information provided is retained permanently in the student'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 is contained in the Privacy Act Issuances, 2011 Compilation.

The student is notified of the privacy protections through a notification at the end of the document. The notification cites 38 U.S.C. 5701 and System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28).

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 of a sensitive nature.

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

Estimate of Information Collection Burden.

- a. Number of Respondents: 10,614
- b. Frequency of Response: Annual
- c. Annual Burden Hours: 1,769
- 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) http://www.bls.gov/oes/current/oes_nat.htm#00.0000, (dated May 2015).

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 \$41,094 (1769 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 recordkeeping 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. Processing cost of \$92,978 is based on the salary of an adjudicator (GS-9 step 5 with an hourly salary of \$26.28), a processing time of 20 minutes per response, and a total of 10,614 responses.
- b. Forms are available on the VA intranet forms websites.
- c. Printing and production costs \$0
- d. Total cost to government \$92,978

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

There was an increase in the number of trainees each year in 2013, 2014, and 2015. The expiration date has been added to the form letter”.

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.