

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

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 educational benefits for Veterans and to 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, and section 903 of Public Law 96-342. 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. 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 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. 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 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. 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.

VA is not aware of any duplication of this information collection.

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

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. 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.

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. 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 FR 14680, No. 120, pages 40773. No public 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 a change in enrollment is reported, the VA Form 22-1999V is retained in the individual's education folder. Forms that do not show changes in enrollment status are eventually destroyed in accordance with the VA directives. Our assurance of confidentiality is covered by 38 U.S.C. 3680 and 3684, and our Systems 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.

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 questions on this form are 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: 1465
- b. Frequency of Response: On occasion. [333 responses per year X 4.4 = 1465.
- c. Annual Burden Hours: 122 [333X4.4X5/60]
- d. Estimated Completion Time: 5 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. According to the latest available BLS Current Population Survey (CPS) (<http://www.bls.gov/cps/cpsaat39.htm>) (dated February 10, 2016), the median weekly earnings of full-time wage and salary workers are \$809.20. Assuming a forty (40) hour work week, the median hourly wage is \$20.23. 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 \$2468.10 (122 burden hours x \$20.23 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/Analyzing costs **\$7430** (\$1726+\$1303+\$4401)

We estimate that 1320 (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 \$15.69 (GS 4, step 5). It will take approximately 122 hours to process all forms received resulting in a processing cost of **\$1726**. [1320X5/60 X \$15.69]

We estimate that 147 (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 \$26.59 (GS 9, step 5) for a total of **\$1303**. [147X20/60 X \$26.59]

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 **\$4401** of the total amount of reporting fees paid each year will be attributable to advance payment certifications. [1465 x 3]

- a. Forms are not available on the VA inter/intranet forms websites as it is a controlled form completed and submitted by the institution of higher learning.
- b. Printing and production cost **\$0**
- c. Total cost to government **\$7430**

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

The requested burden estimate is 122 hours which has increased due to an increase in the number of applications received over FY's 2013, 2014 and 2015.

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 / does not employ statistical methods.
If statistical methods are employed, Part B must be completed.