

OMB #2900-0576

VA Form 22-1999c	Renewal Submission of Certification of Affirmation of Enrollment Agreement Correspondence Course
------------------	--

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 educational benefits for correspondence training under chapters 30, 32, 33, 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 statute provides that before VA can pay education benefits, the claimant must affirm in writing the enrollment agreement for the correspondence course after the expiration of 5 full days after the date that he or she signed the correspondence contract. Accordingly, VA Form 22-1999c, Certificate of Affirmation of Enrollment Agreement of Correspondence Course was developed to assist with this statutory requirement. The claimant either affirms the agreement or destroys this form. The claimant then notifies the correspondence school of this decision. If the agreement is affirmed, the claimant enters a date no later than the seventh day after the date the agreement was signed, signs the form, and then the claimant sends the completed form to the correspondence school. The correspondence school's Certifying Official attaches an enrollment certification to VA Form 22-1999c and sends both forms to VA for processing.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3686(b)
- b. 38 U.S.C. 3323(a)
- c. 10 U.S.C. 16136(b)
- d. 10 U.S.C. 16166 (b)
- e. 38 C.F.R. 21.4256 (b)

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 to pay education benefits for correspondence training. This information allows VA to determine if the claimant has been informed of the 5 day reflection period required by law.

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.

This collection has been converted to an electronic fillable format which is available on the internet. Due to cost restrictions, it is prohibitive to have this form made capable to be submitted electronically.

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 or entities.

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 when a claimant requests education benefits based on approved correspondence training.

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 January 26, 2017, Volume 82, No. 16, page 8568. 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.

VA Form 22-1999c 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. 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. Please show mathematical calculations:

Note: The average number of claimants who entered correspondence courses for this collection that is from '2013, '2014, and '2015 was 445 respondents. The number of time for each submission remains at 3 minutes.

Estimate of Information Collection Burden

a. Number of Respondents: 445

- b. Frequency of Responses: Annually
- c. Annual Burden Hours: 22 (445 X 3min / 60 = 22)
- d. Estimated Completion Time: 3 minutes
- e. The respondent population for the VA Form 22-1999c 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 \$954.40. Assuming a forty (40) hour work week, the median hourly wage is \$23.86.

The general wage code of "00-000-0000 for "All Occupations" may be found by clicking this link http://www.bls.gov/oes/current/oes_nat.htm#00.0000 all occupations as of May, 2016).

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 \$525 (22 burden hours X \$23.86 per hour).

The total estimated cost to the public is \$330 (22 hours multiplied by \$15 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeeping resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no questions of a sensitive nature.

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:

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
09	05	22	27.02	--	445	\$594
--	--	--	--	--	--	--
Overhead at 100% Salary						\$594
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						
Processing / Analyzing Costs (22 hours X 27.02)						\$594
Printing and Production Cost						\$0
Total Cost to Government						\$594

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. 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

The slight increase in the annual reporting burden hours is due to the overall increase of the number of respondents entering correspondence courses from 360 to 445. The previous submission accounted for years of data from 2011 and 2012, whereas this submission covered three years of respondent information from 2013 through 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 not employ statistical methods. If statistical methods are employed, Part B must be completed.