

**SUPPORTING STATEMENT
TIME RECORD (WORK-STUDY PROGRAM)
(2900-0379)
VA FORM 22-8690**

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 work-study allowance to veterans and other eligible persons pursuing approved programs of education under Chapters 30, 31, 32, 33, and 35 of 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).

VA Form 22-8690 is a time sheet report used by a supervisor and an eligible individual to record and report the number of hours completed by the trainee. The form should be submitted after the trainee completes at least 50 hours of work.

The following administrative and legal requirements necessitate the collection:

- A. Title 38 United States Code §3485
- B. Title 38 Code of Federal Regulations §21.272 and §21.4145.

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 the information collected on these forms to ensure that the amount of benefits payable to the student who is pursuing work study is correct. Without this information, VA would not have a basis upon which to make payment.

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 form is not available for use through the internet by the general public due to the risk of fraud. However, the form is available in a fillable format on the VA intranet (internal form) website for both the supervisor and the work-study trainee to complete the form.

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 information collection cannot be reduced for small schools or other reporting organizations. The form must be submitted for any student receiving work-study benefits. The information provided must be uniform and consistent regardless of the size of the school or other reporting organization.

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.

Payment of work-study benefits cannot be made without a completed form.

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 the 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 April 5, 2017, Volume 82, Number 64, page 16665. No 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 payment or gift 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.

VA Form 22-8690 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:

Estimate of Information Collection Burden.

- a. Number of Respondents: 75,306
- b. Frequency of Response: Annually
- c. Annual Burden Hours: 6,275
- d. Estimated Completion Time: 5 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 are \$929.20. 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: https://www.bls.gov/oes/current/oes_nat.htm, 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 \$149,722 (6,275 burden hours X \$23.86 per hour).

The total estimated cost to the public is \$149,722 (6,275 hours multiplied by \$23.86 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 record keeping 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:

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
7	5	15	\$ 22.09	\$ 5.52	75,306	\$ 415,689.00
Overhead at 100% Salary						\$ 415,689.00
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						\$415,689.00
Printing and Production Cost						\$ 40,288.00
Total Cost to Government						\$455,977.00

The

estimated cost to the Federal government is \$455,977. VA calculated this amount as follows:

A GS 7, step 5 working in the Finance Division as an Accounts Receivable Analyst with an hourly salary of \$22.09 would need 15 minutes to process each of the 75,306 forms resulting in a cost of \$415,689.00.

We anticipate having mailing costs of \$39,159 per year based on mailing 75,306 forms (49 cent per stamp, and 3 cents for each envelope = \$.52).

We anticipate having printing costs of \$1,129 for 75,306 forms with a cost of \$15 for printing 1,000 forms (75,306/1000 X \$15 = 1,129).

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/17Tables/html/RUS_h.aspx). 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.

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

The increase in the burden is a result of more students participating in the Work-Study program.

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 submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

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