

Application for Work Study Allowance; Student Work-Study Agreement (Advance Payment); Extended Student Work-Study Agreement; Student Work-Study Agreement
OMB 2900-0209
VA Forms 22-8691,
22-8692, 22-8692a, and 22-8692b

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 benefits to Veterans and other eligible individuals who are receiving educational assistance 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 National Call to Service Provision of Public Law 107-314.

In order to receive work-study benefits, eligible individuals must complete VA Form 22-8691, Application for Work-Study Allowance. The eligible individual then enters into an agreement with VA in which he or she agrees to work a specified number of hours. If the individual wants a payment of work-study allowance in advance of working those hours, VA Form 22-8692, Student Work-Study Agreement (Advance Payment), is used. If the individual does not want an advance payment of the work-study allowance, VA Form 22-8682b, Student Work-Study Agreement, is used. If the individual wants to extend the work-study contract, VA Form 22-8692a, Extended Student Work-Study Agreement, is used.

Section 3485 of title 38, United States Code, and section 21.4145 of title 38, Code of Federal Regulations necessitate these collections of information.

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 to determine the individual's eligibility for the work-study allowance, the number of hours the individual will work, the amount payable, whether the individual desires an advance payment, and whether the individual wants to extend the work-study contract.

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. The electronic connection is made via an internet-based application called Veterans Online Application

(VONAPP) that collects the same information as the printed on VA Form 22-1995. VONAPP allows applicants to submit information directly to the Regional Processing Office (RPO) with jurisdiction over the claim, reducing potential error and speeding the application process.

Work-Study applicants complete these forms and return them to the VA Regional Processing Office of jurisdiction for processing. The work-study application is available in an electronically fillable format on VA's website. Except for the application form, these forms go back and forth between VA and the claimant before the contract is finalized. This method of collecting the information is the most efficient and causes the least burden on the public. Further automation of these submissions is not practical due to the low frequency of the information collection and the complexity of developing a system for the full electronic submission of this information collection.

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.

A review was 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 only affects individual claimants. There is no impact on educational institutions or small businesses.

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 were not collected or collected less often, VA could not pay work-study benefits. There are no technical or legal obstacles to prohibit reduction of the collection 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 August 1, 2017, Volume 82, No. 146, pages 35876. 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.

These forms are retained permanently in the claimant's work-study folder. Privacy to the extent permitted by law is covered by VA 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.

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: 113,851
- b. Frequency of Response: 1
- c. Annual Burden Hours: 17,865
- d. Estimated Completion Time:

FORM	TIME (MIN)	# of FORMS	HOURS
VA Form 22-8691 (approved & denied)	15	53,083	13,271
VA Form 22-8692 & 22-8692b	5	46,673	3,889
VA Form 22-8692a	3	14,095	705
	Total	113,851 Forms	17,865 Hours

- e. The respondent population for VA Forms 22-8691, 22-8692, 22-8692a, and 22-8692b, is composed of individuals providing information in order to perform work study. VA 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 (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers are \$954.40. Assuming a forty (40) hour work week, the mean hourly wage is \$23.86 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: (http://www.bls.gov/oes/current/oes_nat.htm#00-0000 May 2016).

Legally, respondents may not pay a person or business for assistance 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 \$426,258.90 (17,865 burden hours x \$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 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:

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
6	5	10	.17	\$19.95	\$ 3.30	53,083	\$ 175,173.90
Overhead at 100% Salary							
6	5	10	.17	\$19.95	\$ 3.30	46,673	\$ 154,020.90
Overhead at 100% Salary							
6	5	5	.08	\$19.95	\$ 1.66	14,095	\$ 23,397.70
Overhead at 100% Salary							
Processing / Analyzing Costs							\$ 352,592.50
Printing and Production Cost							\$ 0
Total Cost to Government							\$ 352,592.50

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.

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/GS_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 each grade level spend to process to completion a claim received on this form. The within-grade step (5) of each employee represents the average experience of employees within each grade.

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

The increase reflects in the increase in the number of individuals using education benefits.

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.