

SUPPORTING STATEMENT

VA Form 22-1999	Renewal Submission for VA Enrollment Certification OMB-2900-0073
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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 to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C., section 510 and chapters 1606 and 1607, title 10, U.S.C., and 901 and 903 of Public Law 96-342. Educational institutions and training establishments are required to use the VA Form 22-1999, Enrollment Certification, to report to VA, without delay the information concerning the enrollment or reenrollment into the training of Veterans, service persons, reservists, and other eligible individuals. In certain instances, the enrollment certification is used by VA to authorize and make payments in advance if the trainee requests an advance payment. In other instances, VA is authorized to make lump sum payments of up to 60% of a claimant's tuition and fees if the trainee requests an accelerated payment. In these cases, VA Form 22-1999 serves as the trainee's request for an accelerated payment as well as for the educational and/or training institution's report of the trainee's enrollment.

The following administrative and legal requirements necessitate the collection:

A. 38 U.S.C. 3034, 3241, 3323, 3680; and 3684, 10 U.S.C. 16136, and 16166

B. 38 CFR 21.4203, 21.5200(d), 21.7152, 21.7652, and 21.9720

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 VA Form 22-1999 to determine the amount of educational benefits payable to the trainee during the period of enrollment or training. Additionally, VA also uses these forms to determine whether the trainee has requested an advance payment or accelerated payment of benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting an advance or accelerated 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.

Information technology is being used to reduce the burden. VA allows schools to submit the information using VA Online Certification of Enrollment through (VA-Once). The majority of enrollment certifications received are 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.

VA would not be able to pay benefits for training if this information were not collected.

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 notices were published in the Federal Register on December 6, 2017, Volume 82, Number 233, page 57654. No comments were received from the public in response to this notice.

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 school 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.

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 information collected is of a sensitive nature.

12. Estimate of the hour burden of the collection of information. Please show mathematical calculations:

The total estimated burden to the public for this information collection is 851,394 hours. The average submissions from respondents over '2014, '2015 and '2016 period is 3,405,576; *[This figure is based on hardcopy and electronic supplemental enrollments whereby 2 submissions were received each year over the 3 year period. The total number of responses was 6,811,152].*

- a. **Number of Respondents: 1,702,788**
- b. **Frequency of Response: Twice Annually**
- c. **Annual Burden Hours: 851,394 hours**
- d. **Estimated Completion Time for Respondent: 15 minutes**
- e. **The respondent population for the VA Form 22-1999 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 [https://www.bls.gov/oes/current/oes_nat.htm_for "All Occupations"](https://www.bls.gov/oes/current/oes_nat.htm_for%20All%20Occupations) 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 \$20,314,261 (851,394 burden hours X \$23.86 per hour).

The total estimated cost to the public is \$21,284,850 (851,394 hours multiplied by the respondent cost of \$25 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 Employee	Hourly Rate	Cost Per Response	Total Responses	Total
09	05	20 min	27.48	--	1,702,788	\$17,027,880
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Overhead at 100% Salary						\$17,027,880
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						\$17,027,880
Printing and Production Cost						\$0
<u>Total Cost to Government</u>						\$17,027,880

Note: The hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/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.

No adjustments have been made since the prior submission.

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 OMB83-1.

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.