

SUPPORTING STATEMENT

VA FORM 22-0803	Application for Reimbursement of Licensing or Certification Test Fees OMB-2900-0695
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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

Statute requires that an individual who desires a benefit the Department of Veterans Affairs (VA) administers must apply to VA for that benefit (38 U.S.C. 5101(a)). The collection of information is necessary to apply 38 U.S.C. 5101(a) and 38 U.S.C. 3689 (which is applicable pursuant to 38 U.S.C. 3034(a), 3241(a), 3323, 3471, and 3513) to claims for educational assistance for licensing or certification tests under the various educational assistance programs VA administers.

This submission represents a revision of an existing collection. Due to the enactment of Title V of Public Law 110-252, it is necessary to provide individuals eligible for chapter 33 the ability to apply for reimbursement of licensing or certification test fees.

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 will use the information collection specific to licensing or certification test reimbursement to decide whether the claimant should be paid educational assistance for taking a licensing or certification test and the amount the claimant should be paid.

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 online electronic collection will be made via the Vets.gov portal which has been implemented using algorithms that help guide the applicant toward completing the application based on their responses to the questions being asked. The implementation and use of Vets.gov helps to reduce

the burden while continuing to enable the Veteran to submit the application directly to the Regional Processing Office (RPO) with jurisdiction over the claim, thus reducing potential errors and speeding up the application process.

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 will not have a significant impact on a substantial number of small entities. Only individuals will supply this information.

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 VA does not collect this information, we will not be able to determine who is eligible for reimbursement of licensing or certification test fees or the amount that should be paid to those who are eligible.

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 this 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 30, 2018, Volume 83, No. 83, Pages 18877. There were 2 public comments.

1) Public Comment:

Dear Ms. Kessinger:

OMB Control Number: 2900-0695 refers to Application for Reimbursement of Licensing or Certification Test Fees, (VA Form 22-0803).

Whenever a Department of Veterans Affairs (VA) Notice is published in the Online Federal Register (FR – <https://www.federalregister.gov/agencies/veterans-affairs-department>) pertaining to requesting public comment on a change to an existing collection of records OR a new collection of records maintained by VA, there are a significant lack of necessary documents to allow such public comment. The new or revised form/content is not included in the VA FR Notice so there is no way to compare these changes with what is already part of the collection. Additionally, in many cases, there may be other Supporting Statements associated with this collection change that may provide insight on why this change is being proposed but they are not part of the FR Notice. This is the case in all Notices up for OMB review AND many other Notices that indicate a change to a record collection maintained by VA.

The online FR as indicated in the link above ALREADY has an easy way to rectify this situation and provide those missing documents that would then allow public comment. The online FR allows a sidebar section titled “Enhanced Content” that has a subsection within it called “Supporting/Related Materials”. Those missing documents (new/revised collection form/content as well as any Supporting Statement) could be included within that subsection in the VA FR Notice.

I suggest making this change to include those missing documents in the Enhanced Content portion of the online FR Notice and this will then allow any necessary public comment to be provided. This only needs to be provided for revisions and additions to record collections (in some cases reinstatements of record collections that no longer have available content on the Internet). Extensions of already approved collections do NOT need to have this Enhanced Content.

Roland Roberts

VA’s Response to Public Comment:

Mr. Roberts –

VA forms managers do upload the information collection instruments (forms, surveys, etc.) and the supporting documents for the information collection into ROCIS (GSA Data Base). At the present time we have not been required to upload these same documents to the Federal Register. The Federal Register Notice does provide the VA contact information so that the public can request the documents from either the VA Clearance Officer (Cynthia Harvey-Pryor) or myself (Nancy Kessinger). If the VA Clearance Officer determines that VA forms managers will start using the “Enhanced Content” feature and she notifies us of this change we will proceed to use the feature.

Nancy J. Kessinger
VBA Forms Manager (20M33)
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2) Public Comment:

Form needs to be shorter. As a veteran some of the questions are redundant.

Kevin Johnson

VA's response to Public Comment:

Mr. Johnson –

Thank you for your comment. VA is in the process of reviewing the form for redundancy and will make every effort to ensure that the Veteran is not required to answer redundant questions.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

VA does not provide any payments or gifts 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 22-0803 is retained in the student's education file. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation Records – VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2012 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 considered to be of a sensitive nature.

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

The estimated burden to the public for this information collection is **660 hours**.

a. Number of Respondents: **2,641**

b. Frequency of Response: **Annually**

- c. Annual Burden Hours: **660 hours**
- d. Estimated Completion Time for Respondent: **15 minutes**
- e. **The respondent population for this VA Form 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 \$973.60. Assuming a forty (40) hour work week, the median hourly wage is \$24.34.

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" as of May, 2017).

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 \$16,088.74 (661 burden hours X \$24.34 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).

This submission does not involve any record keeping costs.

14. 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	--	2,641	\$24,192
						\$0
Overhead at 100% Salary						\$24,192
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						\$0
Printing and Production Cost						\$0

Total Cost to Government _____	\$24,192
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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.

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

The increase in this annual burden is due to the increase in the number of individuals seeking licensing and certification test reimbursement.

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 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.