

SUPPORTING STATEMENT

VA Form 22-1999b	Notice of Change in Student Status OMB-2900-0156
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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, persons on active duty, reservists, and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35 of title 38, United States Code; chapters 1606 and 1607 of title 10, U.S.C.; sections 901 and 903 of Public Law 96-342; the National Call to Service Provision of Public Law 107-314; and the "Transfer of Entitlement" Provisions of Public Laws 107-107 and 110-252. Benefits are not payable when pursuit of a program is interrupted or terminated, or is not completed according to the regularly established policies and regulations of the educational institutions. Educational institutions are required to report without delay to VA, in the form prescribed by VA, the interruption or termination, or a finding of unsatisfactory attendance, progress, or conduct. VA Form 22-1999b serves as this report to VA of such changes in enrollment status.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3020, 3034(a), 3241, 3323(a), 3474, 3524, 3680(a), 3684(a); 10 U.S.C. 510, 16136(b), and 16166(b).
- b. 38 Code of Federal Regulations 21.4203, 21.5200(d), 21.5292(e)(2), 21.5812, 21.7156, 21.7656, 21.9720, and 21.9725.

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 whether the eligible person's educational benefits should be increased, decreased, or terminated, and the effective date of the change, if applicable. Without this information, VA might underpay or overpay benefits.

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 (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.

Educational institutions providing training are the only sources for this information. The change in this information collection will not have a significant impact on a substantial number of small entities and the existing burden cannot be reduced for these entities. The information must be provided in a uniform, consistent fashion regardless of the size of the educational institution for those students who have changes in their enrollments.

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 is not collected, eligible persons may be underpaid or overpaid. If the information is collected less frequently, it would impair VA's ability to prevent overpayments and under-payments of educational benefits.

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 April 17, 2018, Volume 83, Number 74, pages 16924. 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.

10. VA Form 22-1999b is retained permanently in the claimant's electronic education folder. The confidentiality of the information entered on this form is required by 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 estimated annual burden for the collection of the information is 68,586 hours.

Based on an estimated receipt of 411,517 responses as indicated above, the annual burden is 116,600 hours.

Therefore, the annual cost to schools that submit responses electronically is estimated to be \$1,509,000 based on 100,600 hours based on the respondents' cost of \$15 an hour.

The estimated burden to the public for this information collection is 68,586 hours. The estimated submissions from respondents is 411,517.

VA receives an average of 411,517 responses from approximately 9,000 schools VA estimates that it will take 10 minutes to complete this form.

- a. Number of Responses: **411,517**
- b. Frequency of Response: **On occasion**
- c. Annual Burden Hours: **68,586 hours**
- d. Estimated Completion Time for Respondent: **10 minutes**
- e. The total annual cost to all respondents of \$1,669,383 is offset by school reporting fees paid by VA. 38 U.S.C. 3684 directs VA to pay each institution \$11 for each student certified or \$15 for any students certified for advance payment during the calendar year.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$973.60. Assuming a forty (40) hour work week, the mean hourly wage is \$24.34 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: (https://www.bls.gov/oes/current/oes_nat.htm, May 2017).

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 \$1,669,383. (36,000 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. 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	10 min	27.48	--	411,517	\$1,884,748
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Overhead at 100% Salary						\$1,884,748
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						\$1,884,748
Printing and Production Cost						\$0
Total Cost to Government						\$1,884,748

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/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.

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

The decrease in the annual burden is due to the decrease in the number of VA Form 22-1999b.

This ICR expired due to the transition of systems that affected the process for ensuring that expiring VA Education ICR's were submitted to OMB in a timely manner. The transition has been completed and the information collection request duties have been updated in order to avoid future VA Education ICR's from expiring.

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.