

## SUPPORTING STATEMENT

VA Form 22-1995	Request for Change Of Program or Place of Training OMB 2900-0074
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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.**

Department of Veterans Affairs (VA) pays educational benefits to eligible Veterans and service members (under Chapters 30, 32, and 33 of Title 38, United States Code, and section 903 of PL 96-342), and to Selected Reservists (under chapters 1606 and 1607 of Title 10, United States Code). Each Veteran, service member, or Selected Reservist must be pursuing an approved program of training to be eligible for benefits. The eligible student must complete VA Form 22-1995 (Request for Change of Program or Place of Training) to identify and request approval for a change of program or place of training.

The following administrative and legal requirements necessitate the collection:

- a. 38 U.S.C. 3034, 3241, 3323, 3471, 3691, and 10 U.S.C. 16136(b), and 16162.
- b. 38 CFR 21.4234, 21.7114, 21.7614, 21.1030, 21.5030(c)(2), 21.5292(e)(2), 21.7030, 21.7530 and 21.9510.

**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 requested on this form to determine the applicant's continued eligibility to educational assistance administered by VA when a change of program or place of training occur.

**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 collection is made via an internet-based application called Veterans Online Application (VONAPP) that collects the same information as the printed 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.

**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.**

VA is not aware of any duplication of this information collection.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collection only involves individuals and has 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 is not collected VA would not be able to pay education benefits to individuals who had a change of program or place of training. There are no technical or legal obstacles to reducing the 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.**

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 17, 2018, Volume 83, No. 74, page 16924.

**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 22-1995 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 are 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 questions on this application are considered to be of a sensitive nature.

**12. Estimate of the hour burden of the collection of information. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.**

The number of respondents/responses was determined using the FY 2017 Presidential Budget Submission estimate. Information in the FY 2017 budget estimates that an average of 949,474 trainees will train in educational assistance programs that require use of this form annually from FY 2018 through FY 2020. We estimate that approximately 20 percent of these respondents will complete this form each year for a total number of responses of 184,895.

Each claimant has the option of submitting this form either electronically or by paper application. We estimate that it takes 20 minutes for the average claimant to complete and return the paper version of VA Form 22-1995. We estimate that it takes 15 minutes for the average claimant to complete and submit the electronic version of VA Form 22-1995. VA estimates that approximately 30 percent of claimants will submit the electronic version of the form. See table below for an estimate of the burden hours for the electronic and paper submissions.

<b>Type of Submission</b>	<b>Percent</b>	<b>Number</b>	<b>Minutes</b>	<b>Hours</b>
Electronic	30%	55,468	15	13,866
Paper	70%	129,427	20	43,143
<b>Totals</b>	100%	184,895		57,009

- a. Number of Respondents: 184,895
- b. Frequency of Response: 1
- c. Annual Burden Hours: 57,009
- d. (1) Estimated Completion Time (Paper Application): 20  
(2) Estimated Completion Time (Electronic Application): 15
- e. The respondent population for the VA Form 22-1995 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 (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](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 \$1,387,599.00 (57,009 burden hours x \$24.34 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 Employee	Hourly Rate	Application	Total Responses	Total
09	05	20 min	27.48	Paper	129,427	\$1,185,552
09	05	15 min	27.48	Electronic	55,468	381,066
Overhead at 100% Salary						\$1,566,618
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						\$1,566,618
Printing and Production Cost						\$32,424
<b>Total Cost to Government</b>						<b>\$1,599,042</b>

**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](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 slight change in burden is due to an overall decrease in benefit usage.

**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 omit 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 employ statistical methods.