

**SUPPORTING STATEMENT FOR OMB 2900-0465
STUDENT VERIFICATION OF ENROLLMENT
VA FORM 22-8979**

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 education benefits to veterans and other eligible persons pursuing approved programs of education under chapters 30, 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; NCS (National Call to Service) (10 U.S.C., chapter 31, section 510).

Section 3680(g) of title 38, U.S.C., states that VA may require proof of continued enrollment. VA Form 22-8979 and the electronic versions of this form are used as this proof. This collection obtains verification of the student's continued enrollment prior to releasing payments. This collection of information is for both college and non-college degree programs.

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 by this collection to determine the individual's continued entitlement to benefits. The collection of this information is essential for the administration of these programs. The student is required to submit the verification on a monthly basis to allow for a frequent, periodic release of payment. Without this information, VA could not pay some benefits based on proof of attendance and/or change in enrollment.

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 collect the information provided on this form. Individuals receiving benefits under Chapter 33 do not have to verify their attendance. Chapter 30, 1606, and 1607 respondents must submit this information electronically using either the automated telephone system or the Internet. If the information is provided via the toll-free automated telephone number, it is collected using Interactive Voice Response technology (IVR). If the

information is provided via the Internet, it is collected via the Web Automated Verification of Enrollment (WAVE).

Only respondents receiving education benefits under chapter 32 or 35, or section 903, who are enrolled in non-college degree programs receive the paper form. Currently, VA extracts claimant information electronically from education data resources and places it into the appropriate blocks of VA Form 22 8979. VA then sends the printed form to chapter 32 and 35, as well as section 903, respondents during computer generated monthly mailings. The majority of individuals enrolled in non-college degree programs verify their attendance using the toll-free customer service number (1-888-442-4551) instead of returning the form. The number of respondents who complete and return the paper form is insignificant.

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.

Collection of this information on a monthly basis will prevent overpayment of benefits due to late reporting, since payment will not be made until the report of attendance for this benefit has been returned to VA and processed. To collect information less often would preclude VA from making monthly payments under existing regulations.

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 a special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines. Currently, we do not require monthly verifications under Chapter 33. Additionally, the amount of overpayments is significantly increased, in no small part due to the lack of a second confirmation of the information provided by the school.

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 9, 2019, Volume 84, No. 154, page 39395. 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.

If a student responds using a paper application, the information provided is retained permanently in the student's education folder. Information provided through the internet showing a change in enrollment status is also retained permanently in the student's education folder. Our assurance of privacy is covered 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, 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.

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

- a. Number of Respondents: 185,008 (928,740 responses)
- b. Frequency of Response: On occasion (The approximate number of responses received annually per respondent is 5 responses)
- c. Annual Burden Hours: 15,479 ($928,740 \times 1 / 60 = 15,479$)
- d. Estimated Completion Time: 1 minute
- e. The respondent population for VA Form 22-8979 is composed of individuals who are Veterans and their dependent student. VBA 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 gathers information on full-time wage and salary workers. Accordingly, the median weekly earnings of full-time wage and salary workers is \$999.20. Assuming a forty (40) hour work week, the median hourly wage is \$24.98.

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#00-0000

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 \$386,665 (15,479 burden hours X \$24.98 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:

- a. The estimated annual cost to the Federal Government is \$187,691 based on 928,740 responses and the cost of maintenance for electronically accessible systems.

The following is the annual cost for submissions returned on VA Form 22-8979:

The IVR (toll-free telephone) system is expected to incur a maintenance cost of \$24,500.

VA's Philadelphia IT Center estimates the annual cost of maintaining WAVE as \$97,500.

Based on our last submission, a little over 1% of the responses received will report changes in enrollment. No processing is required by a claims examiner if no change in enrollment is reported by the respondent. Changes in enrollment are processed by a claims examiner (GS9/5 with hourly rate of \$27.93 per hour). These changes in enrollment equal a total of 9,287 responses.

We estimate that 60% of these responses will be decreases in enrollment which require a longer processing time of 20 minutes. This will equal a total of 5,572 responses.
(5,572 responses X 20 minutes = 1,857 processing hours.)

We estimate that 40% of these responses will be increases in enrollment which require a processing time of 8 minutes. This will equal a total of 3,715 responses.
(3,715 responses X 8 minutes = 495 processing hours.)

This is a total processing time for the GS9/5 of 2,352 hours at an hourly rate of \$27.93 resulting in a cost to the government of \$65,691.

- b. Forms are available on the VA inter/intranet forms websites.
- c. No Printing and production cost.
- d. Total cost to government: \$187,691

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

The change in the burden is due to an increase in the number of respondents. The number of individuals utilizing the Chapter 35 education program, that requires enrollment certifications, has increased.

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 information collection fully complies with all the requirements of 5 CFR 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.