

## **SUPPORTING STATEMENT**

**FOR:**

**Application For VA Education Benefits (VA Form 22-1990); Application For Family Member To Use Transferred Benefits (VA Form 22-1990E); Application For VA Benefits Under The National Call To Service Program (VA Form 22-1990N) OMB CONTROL NUMBER 2900-0154**

### **Justification.**

**1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

To receive VA Educational Assistance Allowance under chapters 33 and 30 of title 38, U.S.C., chapter 1606 of title 10, U.S.C., and sections 901 and 903 of Pub. Law 96-342, veterans, servicepersons, and reservists must complete the VA Form 22-1990, Application for Education Benefits. Everyone completes the form only once.

The following administrative and legal requirements necessitate the collection: 38 U.S.C. 3034; 3241, 3323(a), 3471, 5101(a); Pub. Law 96-342, sections 901 and 903; 10 U.S.C. 16136(b),.

**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.**

The claimant uses this form to submit an initial (or "original") claim for VA education benefits. The information requested on this form helps VA determine the applicant's eligibility to education benefits listed in paragraph #1 above. To streamline the application process for the claimant, we have divided one large application into three, removing the two least used programs (National Call to Service (NCS) Transfer of Entitlement (TOE) and developed separate applications for those programs, the VA Form 22-1990E and VA Form 22-1990N.

**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 is made via the va.gov portal, which has been implemented using algorithms that now helps guide the applicant more thoroughly toward completing the application based on their responses to the questions being asked. The implementation and use of va.gov helps to reduce the burden while continuing to enable the claimant 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 information collection only involves individuals (veterans, servicepersons and reservists, and some dependents). There is no impact on small businesses or other small 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.**

If this information is not collected or is collected less frequently, VA could not pay education benefits. 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 publications 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 12, 2019, Volume 84, Number 155, pages 39892 and 39893. No comments were received.

**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 confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

VA Form 22-1990 is retained permanently in the student's education file. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education, Vocational Rehabilitation and Employment 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 the application are of a sensitive nature.

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

The estimated annual burden hours, as indicated below, for the collection of this information is 248,916 **burden hours**, calculated based on the total responses received for 2016, 2017 and 2018.

- a. Number of Respondents: 807,296
- b. Frequency of Response: One Time
- c. Annual Burden Hours (Va.gov): 188,369 ( $565,107 \times 20 / 60 = 188,369$ )  
Annual Burden Hours (Paper): 60,547 ( $242,189 \times 15 / 60 = 60,547$ )
- d. Estimated Completion Time for Electronic/Paper: 20 & 15 minutes, respectively.

Each claimant has the option of filing this form electronically using va.gov program or on paper. It is estimated to take 15 minutes for the average claimant to complete and return the paper version of VA Form 22-1990 and an estimate of 20 minutes for the average claimant to complete and submit the electronic VA Form 22-1990. Data reflects that approximately 70% of claimants apply using the va.gov computer application system.

Type of Submission	%	Number of Respondents	Minutes Each	Burden Hours
VA.gov	70%	565,107	20	188,369
Paper	30%	242,189	15	60,547
<b>Total Burden Hours</b>	100%	807,296	N/A	<b>248,916</b>

e. The respondent population for VA Form 22-1990 is composed of individuals who are Veterans, serviceperson, reservists and dependent students. 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](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 **\$6,217,921** (248,916 burden hours X \$24.98 per hour).

**13. Provide estimates 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 are accessible through this link:  
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>

<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>Cost for Response on Paper Application/ Scanning</u>	<u>Paper Responses</u>	<u>Gov. Cost</u>
Clerk-GS 06	05	5min	\$20.55	N/A	242,189	<b>\$414,748</b> (242,189 X \$20.55 X 5 / 60)
<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>Cost for Total Responses</u>	<u>Total Responses</u>	
VCE-GS 09	05	40min	\$27.93	N/A	807,296	<b>\$15,031,851</b> (807,296 X \$27.93 X 40 / 60)
	Overhead at 100%. Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.					N/A
	Processing / Analyzing Cost					N/A
	Printing and Production Cost					N/A
<b>Total Cost to Government for Processing All Applications (Paper-Electronic)</b>						
<b><u>\$15,446,599</u></b>						

The processing times above are based on the actual amount of time employees of the grade level spend to process to completion, a claim received on these forms.

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

There is a slight increase in burden hours due to a slight increase in the number of 1990 responses received.

**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 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 by the Veterans Benefits Administration does not employ statistical methods.