

**SUPPORTING STATEMENT FOR: VA FORM (No Form)  
Submission of School Catalog to the State Approving  
Agency**

(OMB Control Number 2900-0568)  
**38 U.S.C. § 21.4253(d)**

**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 eligible persons pursuing approved programs of education under chapters 30, 32, 33 and 35, title 38, United States Code, chapters 1606 and 1607, title 10, United States Code, and sections 901 and 903 of Public Law 96-342. These programs may be approved by VA or by divisions of State governments, known as State approving agencies (SAAs), pursuant to a contract VA has with SAAs. Title 38 U.S.C. 3675 requires accredited educational institutions, with the exceptions of elementary and secondary schools, to submit copies of their catalog to the State approving agency when applying for approval of a new course. Title 38 U.S.C. 3676 requires non-accredited institutions to submit at least two copies of their catalog to the State approving agency when applying for approval of a new course. Neither the State approving agencies nor VA can approve such a course until the catalog is submitted. Title 38 CFR, sections 21.4253 and 21.4254, restates this statutory requirement in the Code of Federal Regulations.

**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.**

State approving agencies and VA use the catalogs to determine what courses can be approved for VA training. VA receives catalogs when institutions change their

education programs. In general, the catalogs are collected approximately once a year. Without this information, VA and the State approving agencies cannot determine what courses could be approved.

**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.**

The statute requires that the school submit copies of the catalog to the SAA. While many SAAs will accept electronic catalogs, some SAAs may require a hardcopy. VA will accept electronic school catalogs as part of an approval for all educational institutions provided such catalogs comply with individual state requirements. A school's catalog that is submitted electronically must be submitted in a format that is not alterable.

**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 schools that want the State approving agency to approve courses are the only sources from which the SAA can obtain their catalogs. This information collection will not have a significant impact on a substantial number of small entities. The burden cannot be reduced for these entities. The information must be provided for courses being considered for approval regardless of the size of the educational institution.

**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 schools do not submit their catalogs, State approving agencies will be unaware of what new courses schools are offering, and consequently, would be unable to approve them for educational claimants receiving VA education benefits. Educational claimants may not receive VA educational assistance for pursuit of unapproved courses.

**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 notice was published in the Federal Register on October 2, 2019, Volume 84, Number 191 page 52594.

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

Neither VA, nor any of the State approving agencies provides any payment 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.**

School catalogs are kept by the State approving agencies. These catalogs do not have any confidential information. Schools develop catalogs to give students (and prospective students) knowledge of school rules, regulations and courses offered.

**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**

Catalogs do not contain information considered to be of a sensitive nature.

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

Estimate of Information Collection Burden.

- a. Number of Respondents: 10,330
- b. Frequency of Response: On occasion.  $10,330 \times 15 / 60 = 2,582$  annual burden hours).
- c. Annual Burden Hours: 2,582
- d. Estimated Completion Time: 15 minutes

e. The respondent population for the Submission of School Catalog to the State Approving Agency is composed of accredited educational institutions, with the exceptions of elementary and secondary schools. The 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 worker is \$999.20. Assuming a forty (40) hour work week, the median hourly wage is \$24.98

The general wage code 00-0000 for "All Occupations" may be found by clicking this link: [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm), effective, May, 2018.

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 \$64,498 (2,582 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 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.**

The estimated cost to the Federal government is \$0. State approving agencies collect this information as part of their course approval responsibilities. There are no direct costs to VA associated with this information collection. VA contracts with each State

approving agency for their course approval services. The costs of this information collection are covered under those contracts.

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

There was a slight increase in the burden, due to a slight increase in the number of catalogs collected.

**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.