

**Supporting Statement for VA Form 22-0810
Application for Reimbursement of National Exam Fee
OMB 2900-0706**

A. Justification

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

Public Law 108-454 and Public Law 111-377 authorize the Department of Veterans Affairs (VA) to reimburse claimants for the amount of the fees charged for national tests for admission, and national exams for credit.

Section 106 of Public Law 108-454 allows eligible persons under chapters 30, 32, and 35 of title 38, U.S.C., and chapters 1606 of title 10, to receive reimbursement for approved national tests for admission to institutions of higher learning or graduate schools and national tests providing an opportunity for course credit at institutions of higher learning. Section 108 of Public Law 111-377 allows eligible persons under chapter 33 of title 38, U.S.C. to receive reimbursement for a national test for admission and national tests for credit. As required under 38 U.S.C. 5101, and 38 C.F.R. 21.1030, an eligible individual must apply to VA in order to receive an education benefit administered by VA. VA has developed VA Form 22-0810, Application for Reimbursement of National Test Fees, for claimants' use in submitting information necessary to receive reimbursement for national test fees.

- 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 will use the information collected to determine whether the claimant qualifies to receive reimbursement for a claimed national test, and if so, the amount of the reimbursement.

- 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 is collected when the student applies for reimbursement of the fees required to take the national test. An electronically fillable format of VA Form 22-

0810 is available on VA's website for the claimant to fill out, print, and submit to VA.

- 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 for reimbursement of national test fees only affects individual claimants. There is no significant impact on education 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 will not be able to administer the reimbursement of national test fees as required by statute.

- 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 April 17, 2020, Volume 85, No. 75 pages 21513.

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.

VA Form 22-0810 is retained permanently in the claimant's education folder. Our assurance of confidentiality is covered by 38 U.S.C. 5701 and our System of Records, Compensation, Pension, Education and 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.

There are no questions of a sensitive nature.

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

Estimate of Information Collection Burden.

- a. Number of Respondents: 297
- a. Frequency of Response: 1
- b. Annual Burden Hours: 74
- c. Estimated Completion Time: 15 minutes

- d. The respondent population is 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 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 “00-0000 for All Occupations” was taken from the following website: (http://www.bls.gov/oes/current/oes_nat.htm#00-0000 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 \$1,848.52 (74 burden hours x \$24.98 per hour).

- 1. Provide an estimate of the total annual cost burden to respondents or record-keepers 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.

2. 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.

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.						
		25 hours	\$ 28.72	\$ 718.00	297	\$ 2,133.20
Overhead at 100% Salary						\$ 2,133.20
Processing / Analyzing Costs						\$ 2,133.20
Printing and Production Cost						\$0
Total Cost to Government						\$ 2,133.20

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.

Note: The hourly wage information above is based on the hourly 2020 General Schedule (Base) Pay <https://vaww.infoshare.va.gov/sites/educationservice/pro/Lists/Procedures%20Task%20Creation/Attachments/9/Wage%20and%20Salary%20Table%20for%202020%20Rest%20of%20USA.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 each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

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

The annual burden hours have slightly increased due to an increase in individuals requesting reimbursement of national test fees.

- 4. 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.

- 5. 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.

- 6. 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 not employ statistical methods.