

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 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).
- 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, and PL 115-48.

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. VA.gov is the computer program that represent the technology that is used to collect the information.

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.

The Request for Change of Program or Place of Training, VA Form 22-1995 is currently used to collect the Edith Rogers Nourse STEM Scholarship information based on the Harry W. Colmery Act of 2017, (Public Law 115-48). However, VA is removing STEM from the form, and will instead gather the information utilizing the Edith Rogers Nourse STEM Scholarship application, VA Form 22-10203, which has already been OMB approved.

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 November 16, 2020, Volume 85, No. 221, page 73134. One comment was received.

From: Justin Hauschild <justin.hauschild@studentveterans.org>

Sent: Monday, November 23, 2020 12:06 PM

To: Green, Danny S. <Danny.Green2@va.gov>

Subject: [EXTERNAL] Revision Details: OMB Control No. 2900-0074 and OMB Control No. 2900-0209

Mr. Green,

I am contacting you to request additional details about two recent VA notices for revisions of currently approved collections of information.

The relevant OMB Control Numbers are: OMB Control No. 2900-0074 (Requests for Change of Program or Place of Training) and OMB Control No. 2900-0209 (Applications for Work-Study Allowance; Student Work-Study Allowance (Advance Payment); Student Work-Study Agreement; and Extended Student Work-Study Agreement).

Each Notice indicates the type of review is a revision.

Could you please specify what the revisions are or point me to where they are available publicly so that I may review them?

Best regards,

Justin Hauschild

Legal Fellow

Student Veterans of America

202-223-4710 ext. 542

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The views expressed in this communication are not the legal opinion(s) of the author and are not intended as professional legal advice or counsel. If you need legal advice, you should contact a licensed attorney in the appropriate jurisdiction.

VA Response:

Good Afternoon Mr. Hauschild,

Department of Veterans Affairs received your request regarding OMB Control Numbers 2900-0074 and 2900-0209.

1. Specifically, OMB Control No. 2900-0074 provides an update to the Request for Change of School or Program, VA Form 22-1995. Prior to the creation of VA Form 22-10203, a beneficiary had to apply for the Edith Rogers Nourse STEM Scholarship via the VA Form 22-1995. With the inception of the new VA Form 22-10203, the VA Form 22-1995 must be updated to reflect the change.

In addition to removing the STEM Scholarship choice from this form, VA also made the following additional revisions:

- a. Moved the Request to Opt-Out of Information Sharing with Educational Institutions from the top of the form to the instructions.
 - b. Moderately changed the direct deposit enrollment language for clarity, AND
 - c. Changed the request for the applicant's telephone numbers from Primary and Secondary, to Home and Mobile.
2. Regarding the OMB Control No. 2900-0209, Application for Work-Study Allowance, (VA Form 22-8691), Student Work-Study Allowance (Advance Payment) (VA Form 22-8692a), Student Work-Study Agreement (VA Form 22-8692), and the Extended Student Work Study Agreement (VA Form 22-8692b), these revisions are as a result of renewing the forms associated with the VA Work Study Program and the Information Collection.

While renewing the Information Collection, it was determined some updates were required on the VA Forms:

- a. For the VA Form 22-8691, it was revised to include the Edith Rogers Nourse Stem Scholarship as an education program.
- b. To remove the option for the applicant to apply under the Reserve Educational Assistance Program (REAP or chapter 1607).
- b. Changed the request for the applicant's telephone numbers from Primary and Secondary, to Home and Mobile.
- c. For the VA Form 22-8692, no change.
- d. For the VA Forms 22-8692a and 8692b, no change.

Since the revised forms are currently still within the 60-day Federal Register Notice comment period, these updated versions will not be available on our website(s) until after OMB provides their final approval. However, per your request, I am attaching copies of the VA Forms 22-1995 and 22-8691, which show the affected changes.

Thanks,

Education Service

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.

Type of Submission	Percent	Number	Minutes	Hours
Electronic	30%	55,468	15	13,866
Paper	70%	129,427	20	43,143
Totals	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 \$1,028.80. Assuming a forty (40) hour work week, the mean hourly wage is \$25.72 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 (May 2020).

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 \$1,466,271.48 (57,009 burden hours x \$25.72 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	28.73	Paper	129,427	\$1,239,479.23
09	05	15 min	28.73	Electronic	55,468	398,398.91
Overhead at 100% Salary						\$1,637,878.14
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						\$1,637,878.14
Printing and Production Cost (Maintenance Cost)						\$32,424
Total Cost to Government						\$1,670,302.14

Note: The hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay <https://vaww.infoshare.va.gov/sites/educationservice/pro/Lists/Procedures%20Task%20Creation/Attachments/16/Wage%20and%20Salary%20Table%20for%202020.pdf>, May 2020.

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 VA is removing STEM from the form and will instead, gather the information utilizing the Edith Rogers Nourse STEM Scholarship application, VA Form 22-10203, which has already been OMB approved. There is no change to burden as a result of this revision.

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.