

SUPPORTING STATEMENT
Survey of Individuals Using Their Entitlement to Educational Assistance
under the Educational Assistance Programs Administered by the
Secretary of Veterans Affairs
OMB 2900-NEW

SUPPORTING STATEMENT A

Justification

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

On December 16, 2016, Congress passed Public Law 114-315, the Jeff Miller and Richard Blumenthal Veterans Health Care and Benefits Improvement Act of 2016 (see PLAW-114publ315.pdf, included with this PRA submission). Section 414 of this law requires the Department of Veterans Affairs (VA) to procure a third-party contractor to survey individuals using the Post-9/11 GI Bill. The law required that within 270 days of the enactment of this law, the VA would enter into a contract with a non-government entity to conduct a survey of a statistically valid sample of individuals who are using or who have used their VA entitlement to educational assistance under the Post-9/11 GI Bill (Chapter 33), the Montgomery GI Bill – Active Duty (Chapter 30), the Veterans Education Assistance Program (VEAP; Chapter 32), or the Survivors' and Dependents' Educational Assistance (DEA; Chapter 35). The law provides that the contract shall:

- no later than one month before the collection of data under the survey begins, the survey shall be submitted to the Committees on Veterans' Affairs of the Senate and House of Representatives;
- the non-government entity shall complete the survey and submit to the Secretary the results of the survey no later than 180 days after entering into the contract;
- the survey shall be conducted by electronic means and by any other means the non-government entity determines appropriate.

Per Public Law 114-314, the education assistance program survey is expected to collect the following types of information from each individual surveyed (as applicable):

- Demographic information, including highest level of education completed, military occupational specialty/specialties; whether the individual has service-connected disability; whether individual entitled to rehabilitation and

- participated in such a program
- Satisfaction with education benefit training information: Opinion on the effectiveness of transition assistance program, effectiveness of education/training benefits program, effectiveness of instructions on use of benefits
- Satisfaction with educational assistance program
- Opinion on the resources used to decide to use education benefit and to choose which program to pursue
- Information about goals when enrolling in education/training program
- Perception of experience with education benefits processing system
- Opinion of experiences with school certifying official of educational institution
- Information about any services or benefits the educational institution provided to veterans while pursuing program of education/training
- Type of educational institution, enrollment at full vs. part-time basis
- Whether education/training was completed, or number of credit hours completed
- Employment status
- Description of circumstances preventing individual from using educational assistance entitlement
- Whether the individual is using the entitlement or transferred it to a dependent

VA will ask program beneficiaries to provide feedback on the information required by Public Law 114-315 Section 414.

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 information will be collected from individuals who have used or are using their entitlement to education assistance under chapters 30, 32, 33, and 35 of title 38, United States Code, to pursue a program of education or training. The feedback from the survey will assess the outcomes, situations, and decisions by the beneficiaries of the educational assistance chapters under title 38 United States Code.

The survey is designed to collect the information on beneficiary demographics, including the highest level of education completed by the individual and military occupational specialty while serving on active duty as a member of the Armed Forces. Additionally, the beneficiaries' feedback about the transition assistance program under section 1144 of title 10, United States Code, and the effectiveness of the program, including instruction on the use of the benefits will be collected. The goal of the survey is to gauge an individual's experience with the multiple aspects of VA's education and training benefit. This measurement may bring insights and value to all stakeholders at VA. Front-line VA leaders can take steps to improve the customer experience; meanwhile VA executives can receive data that allow them to make changes.

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.

Educational Assistance Program feedback data will be collected using an online transactional survey or paper survey disseminated via an invitation email or mailed letter sent to selected beneficiaries. After the survey has been distributed, recipients will have two weeks to complete the survey. Invitees will receive a reminder email or mailed letter after one week. The online survey includes branching, such that respondents will not view and respond to all survey questions, but rather the number of questions they receive depends on their responses to prior questions. The survey questionnaire includes 52 questions. Due to branching, respondents will complete anywhere from 8-49 questions (8 if respondents passed their benefit to dependents; 39-49 questions for all other respondents).

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.

VA would not be able to satisfactorily fulfill its legislative mandate to provide benefits for training if this information were not collected.

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 December 22, 2020, Volume 85, Number 246, page 83682.

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.

Our assurance of privacy 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.

None of the information collected is of a sensitive nature.

12. Estimate of the hour burden of the collection of information. Please show mathematical calculations:

The estimated burden to the public for this information collection is 180 hours. The estimated submissions from respondents is 1,080.

- a. Number of Respondents: 1,080
- b. Frequency of Response: Once
- c. Annual Burden Hours: 180 hours
- d. Estimated Completion Time for Respondent: 10 minutes
- e. The respondent population for this new VA Form 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 gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers is \$973.60. Assuming a forty (40) hour work week, the median hourly wage is \$18.58 based on the BLS wage code of "00-000-0000 for "All Occupations." This information was taken from the following website https://www.bls.gov/oes/current/oes_nat.htm, 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 \$3,345 (180 burden hours X \$18.58 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeeping resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There is no expected annual cost burden to respondents or recordkeeping resulting from the collection of information, beyond the hour burden shown in items 12 and 14.

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:

Federal Cost Item	Total
As required by legislation, the survey and report will be conducted on contract. A Firm Fixed Price contract type will be used. The estimate was provided by a qualified vendor given a copy of the legislation and relevant policies.	\$910,000
Federal costs identified in questions 12 and 13	\$0

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

This is a new information collection submission.

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 OMB83-1.

This submission does not contain any exceptions to the certification statement.