

**Supporting Statement for Designation of Certifying Official
OMB 2900-0262
VA Form 22-8794**

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 law requires educational institutions and job training establishments to designate an official that will be responsible for certifying approved training for Veterans and other eligible persons. Each educational institution must have a VA certifying official on staff. The certifying official must submit to VA each student's enrollment information and any changes to such enrollment information. The "Designation of Certifying Official(s)" (VA Form 22-8794) provides VA with the names and signatures of those persons authorized to certify and submit to VA any new hours or changes in the enrollment of their VA students.

The following administrative and legal requirements necessitate the collection:

A. Titles 38 U.S.C. 3034(a), 3241, 3323(a), 3492, 3680, and 3684(a). 10 U.S.C. 16136(b), and 16166(b)

B. Titles 38 CFR 21.4203(a), 21.5200(d), 21.5292(e)(2), 21.5810(a), 21.7140(a), 21.7652, and 21.7656.

- 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 VA Form 22-8794 to maintain a record of the VA Certifying Official responsible for certifying approved training for Veterans and other eligible beneficiaries.

- 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 being used to reduce the burden as the forms associated with these collections are available in an electronically fillable format. However, the form is a controlled form only available to School Certifying Officials (SCOs), so it is not available on external websites. As a result, SCOs must obtain a copy from their Education Liaison Representative when copies are

needed. After the SCO completes the form, it must be signed and submitted 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 burden cannot be reduced for the smaller education institutions. The entries required for this information collection impose only a minimal burden on smaller VA approved facilities, equal to that of the larger institutions.

- 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.**

The consequences that would result if this collection was not submitted each time the person filling the position of Certifying Official changes, which could lead to erroneous student information being reported by someone other than the Designated Certifying Official, and could therefore, lead to fraud.

- 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 21, 2021, Volume 86, No. 75, pages 20795 and 20796.

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 22-8794 is stored and retained permanently in VA's Salesforce data and application repository system, which is updated by VA's Approval, Compliance and Liaison team (AC&L).

Our assurance of confidentiality is covered by 38 U.S.C. 5701 and our System of Records, Compensation, Pension, Education and Veteran Readiness 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: 6,631
- b. Frequency of Response: Annually
- c. Annual Burden Hours: 1105 (6,631 X 10/60)
- d. Estimated Completion Time: 10 minutes

e. The respondent population for the VA Form 22-8794 are school certifying officials of educational institutions who designate new officials to certify school enrollment certifications. 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 \$1,028.80. Assuming a forty (40) hour work week, the median hourly wage is \$25.72 (40 hours X \$25.72).

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 for “All Occupations” as of May 2020).

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 \$28,420.60 (1,105 burden hours X \$25.72 per hour).

13. 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.

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	Hourly Rate	Cost Per Response	Total Responses	Total
11	5	20 minutes	\$ 35.11	\$ 5.85	1,105	\$12,932.18
Overhead at 100% Salary						\$12,932.18

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.	
Processing / Analyzing Costs	\$12,932.18
Printing and Production Cost	\$0
Total Cost to Government	\$12,932.18

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 2021 General Schedule (Base) https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/RUS_h.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 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.

There has been a significant increase in the number of educational institutions designating new school certifying officials responsible for completing and submitting enrollment certifications during the periods from 2018 to 2020.

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 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 does not employ statistical methods.