

SUPPORTING STATEMENT

VA Form 22-10201	Veteran Employment through Technology Education Courses (VET TEC) High Technology Program Employment Verification Form OMB 2900-XXXX
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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.

On August 16, 2017, the President signed into law the Harry W. Colmery Veterans Educational Assistance Act of 2017 (“Forever GI Bill”), Public Law 115-48, which amends Title 38, United States Code to make certain improvements in the laws administered by the Secretary of Veterans Affairs (VA), and for other purposes. Section 116 of the law authorizes VA to establish a 5-year high technology pilot program for veterans as an educational program provided by leading technology employers. Section 116 also requires that VA receive employment certification from school certifying officials (SCOs) and veterans enrolled in the VET TEC pilot program.

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 VET TEC Employment Verification Form 22-10201 will allow student veterans and SCOs to certify that a student veteran has obtained meaningful employment with the skills acquired during their training program funded by the VET TEC program. Education Service request approval of this information collection to implement the provision in law that requires employment verification. VA must begin providing VET TEC no later than January 2019. Thus, VA requires approval of this information collection so that VA can verify veteran employment as required by the law.

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 collection will be made 100% electronically. Information technology will help to reduce the burden. The online electronic collection will be made via the Vets.gov portal which has been implemented using algorithms that help guide the applicant toward completing the application based on their responses to the questions being asked. The implementation and use of Vets.gov helps to reduce the burden while continuing to enable veterans and other eligible individuals to submit their election to opt-out directly to the Regional Processing Office (RPO) with jurisdiction over their claim, thus reducing potential errors and speeding up the application process.

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 comply with statute, if we do not collect veteran employment verification. The new law requires VA to certify and verify employment for student veterans which aligns with the skills acquired during their training program, funded by the VET TEC program offered by the Department of Veterans Affairs.

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 notices were published in the Federal Register on April 2, 2019 Volume 84, Number 63, pages 12670 and 12671. No comments were received from the public in response to this notice.

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.

The information provided is retained permanently in the student'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 is contained in the Privacy Act Issuances, 2011 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 46,875 hours. The initial estimated submissions from respondents is 750.

a. Number of Respondents: 562,500

- b. Frequency of Response: Once
- c. Annual Burden Hours: 46,875 hours
- d. Estimated Completion Time for Respondent: 5 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 (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 \$999.20. Assuming a forty (40) hour work week, the mean hourly wage is \$24.98 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 2018).

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 **\$1,170,937.50** (46,875 burden hours x \$24.98 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 are no questions of a sensitive nature.

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	Cost Per Response	Total Responses	Total
09	05	15 minutes	\$24.34	--	562,500	\$3,422,813

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Overhead at 100% Salary						\$3,422,813
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						\$3,422,813
Printing and Production Cost						\$0
<u>Total Cost to Government</u>						\$3,422,813

Note: The hourly wage information above is based on the hourly 2019 General Schedule (Base) Pay https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB_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.

This is not applicable since this is the first 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.

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods. If statistical methods are employed, Part B must be completed