

# SUPPORTING STATEMENT

<b>VA Form 22-1990S</b>	<b>Veteran Rapid Retraining Assistance Program (VRRAP) Approval</b>
<b>VA Form 22-10271</b>	<b>OMB# 2900-0885</b>

## 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 Veteran Rapid Retraining Assistance Program (VRRAP) was established by Section 8006 of Public Law 117-2 and immediately became effective on March 11, 2021. VRRAP provides eligible Veterans impacted by the COVID-19 pandemic the opportunity to pursue a covered high technology program or another program designed to provide training for a high-demand occupation. The VRRAP training program will pay for up to 12 months of retraining. These new information collections will: 1) allow Veterans the opportunity to apply for the retraining assistance so that VA may determine their eligibility; and 2) allow current GI Bill approved program providers to volunteer to participate and list applicable programs that veterans may apply the VRRAP funding to.

### **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 Form 22-1990S will allow Veterans to apply for VRRAP benefits.

VA Form 22-10271 will allow current GI Bill educational institutions and VET TEC training providers to volunteer to participate in the VRRAP program by acknowledging that they understand and agree to the unique payment structure of VRRAP. The information collection will also allow them to list the programs they seek to have participate in VRRAP.

VA employees will utilize the information provided by the applicant and the institutions, along with information residing in existing VA Information Technology systems, in order to make a determination as to whether or not the applicant meets the definition of an eligible Veteran and whether or not the program qualifies as specified in statute. Also, the information provided will be utilized to pay the institutions as agreed.

**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 information from Veterans collected on VA Form 22-1990S will be collected electronically through the VA.GOV electronic application(s) portal at [www.va.gov](http://www.va.gov). Information technology will help to reduce the burden. The online electronic collection through va.gov has been implemented using algorithms that help guide the applicant toward completing the application based on their responses to the questions being asked.

The information from educational institutions collected on VA Form 22-10271 will be collected electronically through a fillable pdf electronic application and required to be returned via email. Information technology will help to reduce the burden.

**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 includes educational institutions who acknowledges voluntary participation in the VRRAP program by completing, and submitting the Participation Agreement, VA Form 22-10271 as an open-ended one-time submission, via email, directly to the Muskogee Regional Processing Office. The use of electronic submission will minimize the burden for these educational 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.**

VA would not comply with statute, if we do not offer a manner for Veterans to apply to the VRRAP program. The new public law, which was effective upon enactment, requires VA to begin paying up to 12 months of retraining assistance benefits to eligible Veterans. These information collections will provide VA the information necessary to determine a Veteran's eligibility for VRRAP benefits. Furthermore, VA's authority to

issue VRRAP benefits expires 21 months after the date of enactment, thus making the information collections extremely time sensitive.

**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 June 17, 2021, Volume 86, Number 115, page 32330. 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 Veteran Readiness and Employment Records – VA (58VA21/22/28) which is 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 3,250 hours. The estimated number of submissions from respondents for the application, VA Form 22-1990S is 17,250, which is the statutory maximum number of eligible Veterans who may receive VRRAP assistance. The estimated number of submissions from respondents (educational institutions) for the Participation Agreement, VA Form 22-10271 is 1,500.

- a. Number of Respondents: 18,750
- b. Frequency of Response: Once
- c. Annual Burden Hours: 3,250 hours
- d. Estimated Completion Time for Respondent: 25 minutes (10 minutes for VA Form 22-1990S, and 15 minutes for VA Form 22-10271).
- e. Respondent Population:

**VA Form 22-1990S:**

The respondent population consists of Veterans unemployed due to the COVID-19 pandemic who are seeking to pursue approved high technology programs or other programs designed to provide training for a high-demand occupation. 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.

**VA Form 22-10217:**

The respondent population consists of school certifying officials at educational institutions that voluntarily agree to participate in the VRRAP program in an open-ended, one-time submission of the form sent on behalf of Veterans who pursue the VRRAP program. 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.

**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).**

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](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 \$83,590 (3,250 burden hours x \$25.72 per hour).

**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:**

**Note:** The hourly wage information above is based on the hourly 2021 General Schedule (Base) Pay for the Rest of USA;

[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/RUS_h.pdf)

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 is a slight increase in burden due to adding the participation agreement as part of the collection for the VRRAPI application (VA Form 22-1990s).

**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 I information Employing Statistical Methods.**

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