

**SUPPORTING STATEMENT FOR REIMBURSEMENT OF PREPARATORY (PREP)
COURSE FOR LICENSING OR CERTIFICATION TEST
Public Law 116-154 Section 5
38 USC 3315
VAF 22-10272
(2900-0892)**

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 Department of Veterans Affairs (VA) is authorized to pay education benefits to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 31, 32, 33, and 35 of title 38, U.S.C., and chapter 1606 of title 10, U.S.C.

On August 8, 2020, Public Law 116-154, entitled the “Ryan Kules and Paul Benne Specially Adaptive Housing Improvement Act of 2019,” was signed into law. Section 5 of this law amends 38 U.S. Code § 3315 by adding section 3315B, titled “Preparatory courses for licensure and certification tests.” This new provision allows VA to pay Post 9/11 GI Bill (chapter 33) and Survivors’ and Dependents’ Educational Assistance (DEA or chapter 35) educational assistance for preparatory courses for licensing and certification tests beginning on or after August 1, 2021.

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 collected on the VA Form 22-10272 will be utilized to permit beneficiaries to apply for reimbursement of approved preparatory courses taken to assist with preparing for a Licensing or Certification Test.

VA will use data from this information collection to ensure eligible Post 9/11 GI Bill (chapter 33) and Survivors’ and Dependents’ Educational Assistance (DEA or chapter 35) can receive payment for attending the approved preparatory course. Without the utilization of this form, eligible beneficiaries will not be able to apply for the reimbursement they may be rightly entitled to pursuant to 38 U.S. Code § 3315B.

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 to the extent currently possible. The VA Form 22-10272 will be made available as a fillable PDF document which can either be mailed to the VA Regional Processing Offices or submitted via email.

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.

If the VA do not collect this information, no preparatory courses taken by eligible individuals to prepare for a licensing or certification could be approved and reimbursed.

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 September 7, 2021, Volume 86, Number 170, page 50211. One comment was received from the public in response to this notice as shown below.

10/6/2021

blob:https://www.fdms.gov/09476f2e-8b0c-439a-9dd0-9929bc5f5acb

PUBLIC SUBMISSION

As of: 10/6/21 7:47 AM
Received: October 05, 2021
Status: Posted
Posted: October 06, 2021
Tracking No. kue-beyj-m33x
Comments Due: November 08, 2021
Submission Type: Web

Docket: VA-2021-VACO-0001
2021 Notice with Comments

Comment On: VA-2021-VACO-0001-0324
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Reimbursement of Preparatory Course for Licensing or Certification Test; OMB No. 0892; FR Doc No: 2021-19270

Document: VA-2021-VACO-0001-0338
Comment on ICR-Reimbursement of Preparatory Course for Licensing or Certification Test; Swift, R.

Submitter Information

Email: rswift@workcred.org
Organization: Workcred

General Comment

The Department of Veteran's Affairs might consider adding an additional section on VA-Form 22-10272 to confirm whether the certification or licensure preparatory course supports a certification or licensure exam that is approved by the U.S. Department of Veteran's Affairs. Applicants could use the Department of Veteran's Affairs search tool (<https://inquiry.vba.va.gov/weamspub/buildSearchCountryLCCriteria.do>) to learn which certification and licensure tests are covered and their costs. Or, there could be a check box for Department of Veteran's Affairs staff to confirm that the certification and licensure preparatory course is for an approved certification or license. By adding this box, it would ensure that certification and licensure preparatory courses are only reimbursed for certifications and licenses that have been approved.

VA Response:

Thank you for the comment to add an additional section or clarification to VA Form 22-10272. The applicant is eligible to apply for reimbursement to any preparatory course. However as indicated, reimbursement can only be approved if the preparatory course is VA approved AND the Licensure and Certification Test is approved as well. The GI BILL website provides lists of VA approved preparatory courses as well as the VA approved licensure and certification tests. Upon receipt of a claimant's application for

the preparatory reimbursement, VA considers the charge/cost and approval criteria before issuing any reimbursements.

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 22-10272 will be retained in the student's education file. Our assurance of confidentiality is covered by 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.

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:

a. Number of Respondents: 285

b. Frequency of Response: Occasionally

c. Annual Burden Hours: 71 (285 X 15/60)

d. Estimated Completion Time for Respondent: 15 minutes

e. The respondent population consists of Veterans and eligible individuals seeking reimbursement of preparatory test fees associated with a Licensing or Certification Test. 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 median weekly earnings of full-time wage and salary workers are \$1,082.80. Assuming a forty (40) hour work week, the median hourly wage is \$27.07.

The general wage code of “00-0000 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 \$1,921.97 (71 burden hours X \$27.07 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 recordkeeping/reporting fees/costs associated with this collection.

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	\$29.02	Paper	285	\$2,756.90
Overhead at 100% Salary						\$2,756.90
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						\$2,756.90
Printing and Production Cost (Maintenance Cost)						\$0
Total Cost to Government						\$2,756.90

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

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. Therefore, no change in burden.

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 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, "Certification for Paperwork Reduction Act Submissions," of OMB83-1.

This information collection fully complies with all the requirements of 5 CFR 1320.8(b) (3).

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.