

**WHITE PAPER**  
**Application for Reimbursement of Preparatory (Prep) Course**  
**for Licensing or Certification Test**  
**OMB Control Number 2900-NEW (VA Form 22-10275)**

July 21, 2021

By Electronic Submission

The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Dear OIRA Desk Officer:

Pursuant to 5 C.F.R. § 1320.13, the Department of Veterans Affairs (VA) requests emergency approval by August 1, 2021, of the use of the Application for Reimbursement of Preparatory (Prep) Course for Licensing or Certification Test, VA Form 22-10275.

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.”

The Application for Reimbursement of Preparatory (Prep) Course for Licensing or Certification Test is an essential instrument which the VA plans to use to collect information from beneficiaries under the Post 9/11 GI Bill (chapter 33) and Survivors’ and Dependents’ Educational Assistance (DEA or chapter 35) seeking educational assistance for preparatory courses for licensing and certification tests beginning on or after August 1, 2021.

We fully understand this law passed nearly a year ago, but VA has been working on creating this form in earnest since last year so allow adequate time to gather input from the various stakeholders, include the 53 separate State approving agencies ultimately responsible for adjudicating approval decisions on applications for program approval. However, in the midst of working on this form, the Johnny Isakson and David P.Roe, M.D. Veterans Health Care and Benefits Improvements Act (Public Law 116- 315) was signed by the President on January 5<sup>th</sup>, 2021. This legislation included thirty-two provisions that directly impacted VA Education Benefits. Fourteen of these provisions were effective immediately on the date of enactment. Another fifteen provisions are effective August 1<sup>st</sup>, 2021. Accordingly, VA worked to implement those provisions first. It was our duty to ensure those programs be in place to permit beneficiaries to fully utilize their Post 9/11 GI Bill benefits.

Without approval of this form, eligible beneficiaries may be harmed due to the inability to apply for reimbursement they may be rightly entitled to pursuant to 38 U.S. Code § 3315B.

VA has determined this request meets the criteria of 5 CFR 1320.13, in that the collection of information is needed prior to the expiration of time periods established

under 5 CFR 1320. It is essential to the mission of VA to collect this information. The use of normal clearance procedures, which will take at least 90 days, would hinder the mission of VA by effectively making this additional funding unavailable to covered Veterans beginning August 1, 2021. If granted, the emergency approval is only valid for 180 days.

If you have any questions and/or confirm a publication date, please contact Rochelle Foxworth, VA Privacy Act Officer at [Rochelle.Foxworth@va.gov](mailto:Rochelle.Foxworth@va.gov).

Sincerely,

Thomas J. Alphonso  
Assistant Director,  
Policy and Procedures  
Education Service