

SUPPORTING STATEMENT

APPLICATION FOR REIMBURSEMENT OF LICENSING OR CERTIFICATION TEST FEES

VA FORM 22-0803

OMB CONTROL NUMBER 2900-0695

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information

Statute requires that an individual who desires a benefit the Department of Veterans Affairs (VA) administers must apply to VA for that benefit (38 U.S.C. 5101(a)). The collection of information is necessary to apply 38 U.S.C. 5101(a) and 38 U.S.C. 3689 (which is applicable pursuant to 38 U.S.C. 3034(a), 3241(a), 3323, 3471, and 3513) to claims for educational assistance reimbursement for licensing or certification test fees under the various educational assistance programs VA administers.

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 will use the information collection specific to licensing or certification test reimbursement to decide whether the claimant should be reimbursed the amount of the fee charged for taking a licensing or certification test and the amount.

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.

Currently, the application for reimbursement of licensure or certification test fees is only available in a paper format which can be accessed, fillable and printable through www.va.gov. However, VA is reviewing how information technology could reduce the burden. When available, the online electronic collection will be made via the va.gov electronic application portal, which will include algorithms to help guide the applicant toward completing the application based on their responses to the questions being asked.

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 only involves beneficiaries and has no impact on educational institutions or small businesses.

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 VA does not collect this information, we will not be able to determine who is eligible for reimbursement of licensing or certification test fees or the amount that should be paid to those who are eligible.

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.

The collection of this information does not require any special circumstances.

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 October 27, 2021, Volume 86, No. 205 page 59449. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

VA does not provide any payments or gifts 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 22-0803 is retained in the student's electronic 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 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 considered to be of a sensitive nature.

12. Estimate of the hour burden of the collection of information. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.

The estimated average burden to the public for this information collection is 660 hours based on a total of 12,606 responses over the periods 2018, 2019 and 2020.

- a. Number of Respondents: 4,202 (12,606/3 year)
- b. Frequency of Response: Occasionally
- c. Annual Burden Hours: 1,050 hours (4,202 X 15/60)
- d. Estimated Completion Time for Respondent: 15 minutes

e. The respondent population for the VA Form 22-0803 consists of beneficiaries who are pursuing approved licensure or certification tests. 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 \$1,082.80. Assuming a forty (40) hour work week, the mean hourly wage is \$27.07 based on the BLS wage code – “00-0000 All Occupations.” (\$27.07 X 40 hours). This information was taken from the following website: (<https://vaww.infoshare.va.gov/sites/educationservice/pro/Lists/Procedures%20Task%20Creation/Attachments/43/May%202020%20National%20Occupational%20Employment%20and%20Wage%20Estimates%20BLS.html> May 2021).

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 \$28,423.50 (1,050 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).

This submission does not involve any record keeping 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 Employee	Hourly Rate	Cost per Response	Total Responses	Total
09	05	20 min	\$25.58	\$8.52	4,202	\$35,829.05
Overhead at 100% Salary						\$35,829.05
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						\$35,829.05
Printing and Production Cost (Maintenance Cost)						\$0
<u>Total Cost to Government</u>						\$35,829.05

Note: The hourly wage information above is based on the hourly 2021 General Schedule (Base) Pay https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS_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 was a slight increase to the burden based on the slight increase in the number of beneficiaries seeking licensing and certification reimbursement.

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 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.