

2023 SUPPORTING STATEMENT

APPLICATION FOR REIMBURSEMENT OF NATIONAL EXAM FEE

VA Form # 22-0810 - OMB Control Number 2900-0706

Summary of Changes from Previously Approved Collection:

- Title: Application for Reimbursement of National Exam Fee, VAF 22-0810.
- This collection renewal results in a decrease in burden. The reduction in the burden hours is based on a reduction in the number of average annual national examination fees reimbursed for periods 2020, 2021 and 2022. This information collection request has been entered into ROCIS as a “Revision” due to a decrease in the burden hours.
- There are no revisions required for the VA Form 22-0810 instrument that affects the burden for this collection.
- No comments were received during the Comment Period.

A. Justification.

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

Public Law 108-454 and Public Law 111-377 authorize the Department of Veterans Affairs (VA) to reimburse claimants for the amount of the fees charged for national tests for admission, and national exams for credit. Section 106 of Public Law 108-454 allows eligible persons under chapters 30, 32, and 35 of title 38, U.S.C., and chapters 1606 of title 10 U.S.C., to receive reimbursement for approved national tests for admission to Institutions of Higher Learning (IHLs) or graduate schools, as well as national tests that provide an opportunity for course credit at IHLs.

Section 108 of Public Law 111-377 allows eligible persons under chapter 33 of title 38, U.S.C., to receive reimbursement for a national test for admission and national tests for credit. As required under 38 U.S.C. 5101, and 38 C.F.R. Section 21.1030, an eligible individual must apply to VA in order to receive an education benefit administered by VA. VA has developed VA Form 22-0810, “Application for Reimbursement of National Test Fee”, for claimants’ use in submitting information necessary to receive reimbursement for their national test fees.

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 collected to determine whether the claimant qualifies to receive reimbursement for a claimed national test, and if so, the amount of the reimbursement of the fee charged.

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 is collected when the student applies for reimbursement of the fees required to take the national test. An electronically fillable format of VA Form 22-0810 is available on VA's GI Bill website for the claimant to fill out, print, and submit to VA.

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.

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not impose a significant economic impact on a substantial number of 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 this information is not collected, VA will not be able to adjudicate the reimbursement of national test fees as required by statute.

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.

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

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.

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, September 5, 2023. The 60-Day FRN citation is Volume Number 88, FRN 170, Page 60743. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on XXXXX, XXX,XX,XXXX. The 30-Day FRN citation is volume number XX, FRN XX, Page(s) XXXX-XXXX.

No additional consultation apart from soliciting public comments through the Federal Register was conducted or this submission.

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

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

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 VA Form 22-0810 is retained permanently in the claimant'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 are contained in the Privacy Act Issuances, 2012 Compilation.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

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

No questions considered sensitive are being asked in this collection.

12. Estimate of the hour burden of the collection of information:

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The estimate for this Information Collection burden is based on figures from 2020, 2021 and 2022. There was approximately a total of 692 responses received for these periods, resulting in an annual average of 230 responses received, with a burden of 57 hours.

- a. Number of Respondents: 230.
- a. Frequency of Response: Once.
- b. Annual Burden Hours: 57 [230 X 15 minutes. / 60min = 57].
- d. Estimated Completion Time: 15 minutes.

e. The respondent population is 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 the educational background and wage potential of respondents. Therefore, VBA used general wage data 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 \$1,190.40. Assuming a forty (40) hour work week, the **mean hourly wage is \$29.76 based on the BLS wage code – “00-0000 All Occupations.” (\$29.76 X 40 hours)**. This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm May 2023.

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 \$1,696.32 (57 burden hours x \$29.76 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete 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 are accessible through this link: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf.

Note: The hourly wage information below is based on the hourly 2023 General Schedule (Base) Pay.

Estimated Costs to the Federal Government: \$1,783.65

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<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>Cost per Response</u>	<u>Total Responses</u>	<u>Gov. Cost</u>
09	05	15 minutes	\$31.02	\$7.75	230	\$1,783.65 (230 X \$31.02 X 15 / 60)
	Overhead at 100%. Overhead costs are 100% of salary and are also the same as the wage listed above; and the amount is included in the total.					-0-
	Processing / Analyzing Cost					\$1,783.65
	Printing and Production Cost					-0-
<u>Total Cost to Government</u>						<u>\$1,783.65</u>

15. Explain the reason for any burden hour changes since the last submission.

The burden has decreased since the previous approval due to a reduction in the number of average annual national examination fees reimbursed for periods 2020, 2021 and 2022. This information collection request has been entered into ROCIS as a "Revision" due to a decrease in the burden hours.

There are no revisions required for the VA Form 22-0810 instrument that affects the burden for this collection.

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 results of this information collection will not be published.

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 display of the expiration date for OMB approval on the collection instrument.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.

B. Collection of Information Employing Statistical Methods.

This collection of information by the Veterans Benefits Administration does not employ statistical methods.