

## **SUPPORTING STATEMENT**

### **“Accelerated Payment Verification of Completion Letter”**

#### **VA FORM LETTER 22-0840 – OMB 2900-0636**

##### **Summary of Changes from Previously Approved Collection:**

- Title: Accelerated Payment Verification of Completion Letter, VA Form 22-0840.
- This collection renewal results in a zero increase in burden hours based on the number of average annual receipts of accelerated payment verification letters for the period(s) 2020, 2021 and 2022. This information collection request has been entered into ROCIS as an “Extension” due to no change in burden hours from the previous renewal submission.
- There are a few very non-substantial revisions required for the VA Form 22-0840, however, those revisions do not affect the burden for this collection.
- There were no comments received in response to the 30 and 60-Day Federal Register Notices.

##### **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 accelerated education benefits to Veterans, Service members, and Transfer of Entitlement (TOE) dependents pursuing approved programs of education under chapter 30, title 38, United States Code, and chapter 1606, title 10, United States Code.

Public Law 107-103 authorized the accelerated payment option under 38 U.S.C. chapter 30, effective October 1, 2002. Public Law 110-181 authorized the accelerated payment option under 10 U.S.C. chapters 1606 effective October 1, 2008. Section 3014A of title 38 and section 16131a of title 10 provide that the Secretary must prescribe regulations including the requirements for the request, certification of receipt, and use of an accelerated payment under these education programs.

Title 38 CFR section 21.7154(d)(1) provides the rules for certification and use of the accelerated payment option under 38 U.S.C. chapter 30. Sections 16131a of title 10, U.S.C., provide the rules for certification and use of the accelerated payment option

under chapter 1606. Each of these sections authorize VA to use existing codified regulations for the accelerated payment option under chapter 30 to administer that option under chapters 1606.

**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.**

Eligible Veterans, Service members, and beneficiaries electing to receive an accelerated payment for educational assistance payments must certify they received such payment and how the payment was used, and the data collected from the VA Form 22-0840 is used to determine the entitlement to the accelerated payment.

**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.**

Responses from the VA Form 22-0840 are not submitted electronically. Education Service previously had been discussing ways to allow electronic responses for eligible individuals. However, the number of responses remains so small that doing so is not a high priority for IT solutions. The average number of annual responses over this three-year period is only ten and does not fluctuate up nor down by more than a few responses.

**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.**

The VA would not be able to administer the certification provision of accelerated payment set by law and regulation without the continuation of this collection, although small.

**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 Friday, September 15, 2023. The 60-Day FRN citation is Volume Number 88, FRN 178, Page 63674. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Friday, November, 17, 2023. the 30-Day FRN citation is volume number 88, FRN 221, Pages 80390-80391.

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.**

After processing, the eligible individual's information is retained in his or her education file. If the eligible individual's education file is destroyed, all documents contained in that file are also destroyed. Privacy, to the extent permitted by law, is covered by the VA System of Records; Compensation, Pension, Education, and Veteran Readiness and Employment Records – VA (58VA21/22/28), which is contained in the Privacy Act Issuance, 2012.

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 31 responses received for these periods, resulting in an annual average of 10 responses received, with a burden of 1 hour.

- a. Number of Respondents: 10
- a. Frequency of Response: One time
- b. Annual Burden Hour(s): 1 [10 X 5 minutes / 60 minutes = 1]
- c. Estimated Completion Time: 5 minutes.

12e. The respondent population for the VA Form 22-0840 include eligible individuals who are pursuing approved programs of education in courses associated with high cost, high-tech programs. 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 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](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 \$29.76 (1 burden hour 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: \$25.85**

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Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
9	5	5min.	\$ 31.02	\$ 2.58	10	\$ 25.85
Overhead at 100% Salary						\$ 0
Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.						
Processing / Analyzing Costs						\$ 25.85
Printing and Production Cost						\$ 0
<b>Total Cost to Government</b>						<b>\$ 25.85</b>

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](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.

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

This collection renewal results in a zero increase in burden hours based on the number of average annual receipts of accelerated payment verification letters for the period(s) 2020, 2021 and 2022. This information collection request has been entered into ROCIS as an "Extension" due to no change in burden hours from the previous renewal submission.

**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.