

# **WHITE PAPER – JUSTIFICATION**

## **EMERGENCY SUBMISSION OMB CONTROL NUMBER 2900-NEW**

### **SEEKING OMB APPROVAL OF TWO NEW UNIFORM APPLICATIONS FOR DEPARTMENT OF VETERANS AFFAIRS' APPROVAL OF COURSES OF EDUCATION AND 2 ASSOCIATED PROGRAM LISTS FOR EACH—**

- VA FORM 22-10287 “Application for Approval of an Institution of Higher Learning Facility”
- VA FORM 22-10287a “Institution of Higher Learning Facility – Program List”
- VA FORM 22-10288 “Application for Approval of a Non-College Degree, Vocational Flight School, License/Certification Exam Provider, Preparatory Courses for License/Certification, Correspondence School, High School, Apprenticeship/On-the-Job Training for Multi-State Apprenticeship Facility”
- VA FORM 22-10288a “Other than Institution of Higher Learning Facility – Program List”

September 19, 2023  
By Electronic Submission  
The Office of Management and Budget (OMB)  
725 17th Street, NW  
Washington, DC 20503

Dear OIRA Desk Officer:

The Department of Veterans Affairs' Education Service Program Office is seeking a 6-month “Emergency Approval” of the two forms and associated program lists indicated above as authorized and mandated by Section 11 of Public Law 117-333. This Public Law was enacted on January 5, 2023, amending title 38 CFR §3672. This provision of the law required VA to create and design two new uniform applications for approval of courses of educational programs, and for those forms to be available for use by October 1, 2023.

These forms will be completed by educational institutions, training establishments and other organizations, as applicable, seeking approval of one or more of their programs of study for the payment of VA Education benefits to eligible beneficiaries. The institutions will submit the forms to the State Approving Agency (SAA) of jurisdiction for their review. By law, each SAA has the authority to make such approvals in their

respective state. VA contracts with a SAA in each state for this work. Prior to the new legislative requirement, each SAA used their own application form making it difficult for training institutions operating in more than one state to readily complete the process as different states required different information. The new law ensures uniformity across all states.

Once reviewed, the SAA will send the appropriate form with the associated program list, along with a letter documenting their decision to VA for additional processing to incorporate the information into our approval database known as the “Web Enabled Approval Management System” (WEAMS).

Although this law was signed January 5, 2023, the Program Office has since been collaborating with a workgroup comprised of some of the more than fifty SAAs, internal staff, VA leadership, and other stakeholders regarding the information, reporting criteria, and collection questions necessary to make the approval determinations. Because the criteria are complex, it has taken considerable time to reach consensus before moving forward with form development. Approval of this emergency request is critical to the Agency to meet the statutory requirement.

These forms will be used by educational institutions interested in applying for initial approval of their programs for payment of VA benefits, for revision of existing program approvals or withdrawal of approval for programs no longer offered. The institutions will complete either the VA Form 22-10287 or the VA Form 22-10288, based on the type of training offered at their institution. Institutions of Higher Learning (IHLs) will use the VA Form 22-10287 exclusively, and all other types of educational training establishments will use the VA Form 22-10288. Each institution will use their associated “program list” for adding, revising or removing any program they offer. Some administrative revision(s) may be required that do not involve program approval related matters, will be submitted on their respective application. In these instances, the associated program list will not be required. Administrative modifications include things such as changes of address, banking information, or ownership when all program offerings remain the same.

The VA Forms 22-10287 and 22-10288 and their associated program lists will be submitted by the educational institution to the SAA of jurisdiction for review. The SAA makes an approval decision and notifies the institution accordingly. Immediately following, the SAA sends the approval package to the VA Education Liaison Representative (ELR) of jurisdiction. The approval package includes the application from the training institution, the SAA’s findings and additional related information to support payment of GI Bill benefits, as well as a copy of the notification to the training institution.

The ELR reviews the approval package for completeness (or requests additional required information). Once the package is deemed complete, the ELR processes the package by entering the required information into WEAMS. Lastly, the ELR provides a report containing the final information to the training institution, with a copy to the SAA of jurisdiction. The approval data in WEAMS is used by Veterans Claims Examiners

(VCEs) to process benefits payments to eligible VA beneficiaries. The same approval data is fed to our external database known as the Comparison Tool to aid prospective students in choosing a school that best suits their needs.

In turn, the training institution uses the information received from the ELR and SAA to report student enrollments in VA's new electronic reporting system known as "Enrollment Manager" (EM). The enrollment data submitted through EM facilitates payments to eligible student Veterans and beneficiaries.

Because the provisions of Public Law 117-333 Section 11 required the two uniform applications and their associated program lists be developed, designed and available by October 1, 2023, the use of normal clearance procedures would hinder their availability.

If you have any questions, please contact Rochelle Foxworth, VA Privacy Act Officer, at [Rochelle.Foxworth@va.gov](mailto:Rochelle.Foxworth@va.gov).

Sincerely,

Tom Alphonso  
Assistant Director, Policy and Procedures  
Education Service