

Supporting Statement – PART A

Designation of Certifying Official(s)

OMB 2900-0262

Summary of Changes from Previously Approved Collection

- Designation of Certifying Official(s).
- The form was recently changed to allow access to, and submission through, the new electronic submission portal, Enrollment Manager.
- The burden has decreased since the previous approval due to a reduction in the number of average annual “Designation of Certifying Official(s)” instruments received for periods 2021, 2022 and 2023. This information collection request has therefore been entered into ROCIS as a “Revision” due to a decrease in the burden hours.
- No comments were received during the 60-day 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.

The law requires educational institutions and job training establishments to designate an official that will be responsible for certifying approved training for Veterans and other eligible persons. Each educational institution must have a VA certifying official on staff. The certifying official must submit to VA each student’s enrollment information and any changes to such enrollment information. The “Designation of Certifying Official(s)” (VA Form 22-8794) provides VA with the names and signatures of those persons authorized to certify and submit to VA any new hours or changes in the enrollment of their VA students.

The following administrative and legal requirements necessitate the collection:

A. Titles 38 U.S.C. 3034(a), 3241, 3323(a), 3492, 3680, and 3684(a). 10 U.S.C. 16136(b), and 16166(b)

B. Titles 38 CFR 21.4203(a), 21.5200(d), 21.5292(e)(2), 21.5810(a), 21.7140(a), 21.7652, and 21.7656.

- 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.**

The VA uses VA Form 22-8794 to maintain a record of the VA Certifying Official(s) responsible for certifying approved training for Veterans and other eligible beneficiaries.

- 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.**

The SCO can upload the completed form and any required training certificates to the VA Education File Upload Portal, which can be accessed from any browser at <https://www.my.va.gov/EducationFileUploads/s/>. The form is a controlled form only available to School Certifying Officials (SCOs) and SCOs can access a copy from the GI Bill Website (Internet) <https://www.va.gov/find-forms/> under the Find a VA Form tab. After the SCO completes the form, it must be signed then submitted 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.**

The consequences that would result if this collection was not submitted each time the person filling the position of Certifying Official changes could lead to erroneous student information being reported by someone other than the Designated Certifying Official, and could therefore, lead to fraud.

- 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 Monday, May 13, 2024. The 60-Day FRN citation is Volume 89, FRN No 93, Page 41494. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Tuesday, July,16,2024. The 30-Day FRN citation is Volume 89, FRN No 136, Page 57995.

- 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 22-8794 is stored and retained permanently in VA's Salesforce data and application repository system, which is updated by VA's Approval, Compliance and Liaison team (AC&L). Our assurance of confidentiality is covered by 38 U.S.C. 5701, and 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 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.

No questions considered sensitive are being asked in this collection.

- 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.**

Estimation of Respondent Burden:

VA Form 22-8794

[Designation of Certifying Official(s)]

There was a total of 18,532 "Designation of Certifying Official(s)" instruments received for calendar years 2021, 2022, and 2023, resulting in an average annual receipt of 6,177 responses. The result calculates to a total of 1,029 burden hours.

- a. Number of Respondents: 6,177.
- b. Frequency of Response: Annually
- c. Annual Burden Hours: 1,029 (6,177 X 10 minutes / 60 minutes)
- d. Estimated Completion Time: 10 minutes
- e. The respondent population for the VA Form 22-8794 are school certifying officials of educational institutions who designate new officials to certify school enrollment certifications. 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 gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers is \$1,259.20. Assuming a forty (40) hour work week, the median hourly wage is \$31.48 based on the BLS wage code of "00-000-0000 for "All Occupations." 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 \$32,392.92 (1,029 burden hours X \$31.48 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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 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 Labor Cost to the Federal Government: \$81,124.60.

[Designation of Certifying Official(s), VA Form 22-8794]

Grade	Step	Burden Time-VA Employee	Hourly Rate	Cost Per Response	Total Responses	Total
11	5	20min.	\$39.40	\$13.13	6,177	\$81,124.60 (6,177 X \$39.40 X 20min. / 60min.)
Overhead at 100% Salary						\$81,124.60
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						\$81,124.60
Printing and Production Cost						\$0
Total Cost to Government						\$81,124.60

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx.

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.

The burden has decreased since the previous approval due to a reduction in the number of average annual "Designation of Certifying Official(s)" instruments received for periods 2021, 2022 and 2023. This information collection request has been entered into ROCIS as a "Revision" due to a decrease in the burden hours.

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 information collection is not for publication or tabulation use.

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 OMB 83-I.

This information collection fully complies with all the requirements of 5 CFR 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.