

SUPPORTING STATEMENT - PART A

VA Enrollment Certification

VA Form 22-1999, OMB #2900-0073

Summary of Changes from Previously Approved Collection

- o VA Enrollment Certification.
- o The form was also recently changed to allow access to, and submission through, the new electronic form submission portal, Enrollment Manager.
- o This information collection renewal resulted in a decrease in burden hours due to a significant decrease in the number of responses received for the period(s) 2021, 2022 and 2023, and due to the use of three years of data, as opposed to four years used for the previous renewal. This submission is therefore being submitted as a Revision.
- o 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 Department of Veterans Affairs (VA) is authorized to pay educational benefits to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C., section 510 and chapter 1606 of title 10, U.S.C., and section 903 of Public Law 96-342. Educational institutions and training establishments are required to use the VA Form 22-1999, Enrollment Certification, to report to VA, without delay, the information concerning the enrollment or reenrollment into the training of Veterans, Service members, Reservists, and other eligible individuals. In certain instances, the enrollment certification is used by VA to authorize and make payments in advance if the student requests an advance payment. In other instances, VA is authorized to make lump sum payments of up to 60% of a beneficiary's tuition and fees if they request an accelerated payment. In these cases, VA Form 22-1999 serves as the student's request for an accelerated payment as well as for the educational and/or training institution's report of the student's enrollment.

The following administrative and legal requirements necessitate the collection:

A. 38 U.S.C. 3034, 3241, 3323, 3680; and 3684, 10 U.S.C. 16136.

B. 38 CFR 21.4203, 21.5200(d), 21.7152, 21.7652, and 21.9720.

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 uses the information collected on VA Form 22-1999 to determine the amount of educational benefits payable to the student during the period of enrollment or training. Additionally, with the exception of chapter 33, VA also uses these forms to determine whether the student has requested an advance payment or accelerated payment of benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting an advance or 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.

Information technology is being used to reduce the burden as the form associated with this collection is now available in an electronically fillable format and is submitted through the new VA electronic submission portal "Enrollment Manager" (EM). EM is the online system used to certify VA students and trainees. EM use is mandatory. Access must be requested and granted before SCOs can submit it through EM for automated processing.

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.

VA would not be able to pay benefits for training if this information were not collected.

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, May 24, 2024. The 60-Day FRN citation is Volume 89, FRN No 102, Page(s) 45939-45940. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Monday, July 29, 2024. The 30-Day FRN citation is Volume 89, FRN No 145, Page 60975.

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.

When the school responds, the information provided is retained permanently in the student's education folder and in Enrollment Manager. 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 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 22-1999

[VA Enrollment Certification]

There was a total of 11,399,541 “Enrollment Certification” instruments received for calendar years 2021, 2022 and 2023, resulting in an average annual receipt of 3,799,847 responses. The result calculates to a total of 633,307 burden hours.

- a. Number of Respondents: 3,799,847.
- b. Frequency of Response: Occasionally.
- c. Annual Burden Hours: 633,307 hours (3,799,847 x 10min. / 60 min.).
- d. Estimated Completion Time for Respondent: 10 minutes
- e. The respondent population for the VA Form 22-1999 consists of School Certifying Officials who submit the form on behalf of Veterans and eligible beneficiaries 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 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 \$19,936,504.36. (633,307 burden hours X \$31.48 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).

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 Labor Costs to the Federal Government: \$16,496,393.76.

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The processing time estimates below are based on the actual amount of time employees of the grade level spend to process to completion a claim received on this form. It is estimated that only 40% of responses received are processed by the GS-9/5 employee. (total responses of 3,799,847 X 40%) = 1,519,938.

| Grade | Step | Burden Time-VA | Hourly Rate | Cost Per Response | Total Responses | Total |
|-------|------|----------------|-------------|-------------------|-----------------|-------|
|-------|------|----------------|-------------|-------------------|-----------------|-------|

| | | | | | | |
|---|---|-----------------|---------|---------|---|--|
| | | Employee | | | 3,799,847 | |
| 9 | 5 | 20 min. | \$32.56 | \$10.85 | 1,519,938 (@ 40% manually processed) | \$16,496,393.76 (1,519,938 X \$32.56 X 20 min. / 60 min.) |
| Overhead at 100% Salary | | | | | | \$16,496,393.76 |
| 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 | | | | | | \$16,496,393.76 |
| Printing and Production Cost | | | | | | \$0 |
| Total Cost to Government | | | | | | \$16,496,393.76 |

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.

REPORTING FEE INFORMATION: There is no cost to schools because VA pays each school that furnishes training under the various VA education programs a fee for processing all required VA reports or certifications for each Veteran or other claimant. VA refers to these fees as "school reporting fees" which help schools to defray the costs of processing paperwork required to be submitted to VA. The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967, and are in 38 U. S. C. 3684.

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

This information collection renewal resulted in a decrease to burden hours due to a significant decrease in the number of responses received for the period(s) 2021, 2022 and 2023, and due to the use of three years of data, as opposed to four years used for the previous renewal. This submission is therefore being submitted as a Revision. This information collections considers various types of enrollments such as paper hardcopies, electronic originals, and supplemental enrollments.

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 of the OMB approval on the collection instrument.

18. Explain each exception to the certification, "Certification for Paperwork Reduction Act Submissions," of OMB83-1.

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 does not employ statistical methods. If statistical methods are employed, Part B must be completed.