

## SUPPORTING STATEMENT - PART A

Request for Change of Program or Place of Training – OMB Control Number 2900-0074

### Summary of Changes from Previously Approved Collection

- Request for Change of Program or Place of Training.
- This information collection renewal resulted in an increase in burden hours due to an increase in the number of responses received for the period(s) 2021, 2022 and 2023 and is therefore being submitted as a Revision.
- The form was recently changed to allow access to, and submission through, the electronic form submission portal, VA.gov.
- No comments were received during the 60-day public comment period.

### 1. Need for the Information Collection

Department of Veterans Affairs (VA) pays educational benefits to eligible Veterans, Service members, and eligible dependents under the Chapters 30, 32, and 33 programs; Section 903 of PL 96-342, and to Selected Reservists under Chapter 1606 of Title 10 U.S. Code. Each eligible individual must be pursuing an approved program of training to be eligible for benefits. The student must complete the Request for Change of Program or Place of Training, VA Form 22-1995 to identify and request approval for a change of program or place of training.

The following administrative and legal requirements necessitate the collection:

- a. 38 U.S.C. 3034, 3241, 3323, 3471, 3691, and 10 U.S.C. 16136(b).
- b. 38 CFR 21.4234, 21.7114, 21.7614, 21.1030, 21.5030(c)(2), 21.5292(e)(2), 21.7030, 21.7530 and 21.9510.

### 2. Use of the Information

The VA uses the information requested on this form to determine the applicant's continued eligibility to educational assistance administered by VA when a change of program or place of training occurs.

### 3. Use of Information Technology

Information technology is helping to reduce the burden. The electronic collection is currently being submitted through VA.gov electronic submission portal. This system collects the same information as the printed VA Form 22-1995 but only takes 15 minutes to complete versus 20 minutes for the paper version.

### 4. Non-duplication

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

### 5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

### 6. Less Frequent Collection

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

### 7. Paperwork Reduction Act Guidelines

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. Consultation and Public Comments

#### Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, May 31, 2024. The 60-Day FRN citation is Volume 89, FRN 47242. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Friday, August 2, 2024. The 30-Day FRN citation is Volume 89, FRN 63254.

#### Part B: CONSULTATION

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

9. Gifts or Payment

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

10. Confidentiality

The VA Form 22-1995 is retained in the student’s education file. Our assurance of confidentiality is covered by 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.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

- a. Number of Respondents: 243,462.
- b. Frequency of Response: Once Occasionally.
- c. Annual Burden Hours: 66,951 (Please refer to chart below for burden calculation).
- d. (1) Estimated Completion Time (Electronic Application-VA.gov): 15 minutes.  
(2) Estimated Completion Time (Paper Application): 20 minutes.

Each claimant has the option of submitting this form either electronically or by paper application. We estimate that it takes 15 minutes for the average claimant to complete and submit the electronic version of VA Form 22-1995. We estimate that it takes 20 minutes for the average claimant to complete and return the paper version of VA Form 22-1995. We estimate that 70 percent of the applications are received electronically, with 30 percent sent by mail.

Type of Submission	Percentage of Total Annual Responses (Electronic vs. Paper)	Total Annual Number of Responses Received	Minutes	Burden Hours
Electronic	70%	170,423	15	<b>42,605</b>

(Va.gov)				(170,423 X 15min / 60min)
	of 243,462			
Paper	30% of 243,462	73,039	20	<b>24,346</b> (73,039 X 20min / 60 min)
<b>Totals</b>	<b>100%</b>	<b>243,462</b>	<b>-----</b>	<b>66,951</b>

e. The respondent population for the VA Form 22-1995 consists 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](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 respondent cost to be \$2,107,617. (66,951 burden hours X \$31.48 per hour).

### 13. Respondent Costs Other Than Burden Hour Costs

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. Cost to the Federal Government

Grade	Step	Burden Time Employee	Hourly Rate	Application	Cost per Response	Total Responses	Total
09	05	15 min	\$32.56	Electronic	\$8.14	170,423	\$1,387,243.22
09	05	20 min	\$32.56	Paper	\$10.85	73,039	\$ 792,716.61
Overhead at 100% Salary							\$2,179,959.83
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.							
Processing / Analyzing Costs							\$2,179,959.83
Printing and Production Cost							-0-
<b>Government Cost</b>							<b>\$2,179,959.83</b>

Overhead costs are 100% of salary and are the same as the wage listed above and the amounts are included in the total. This collection has no printing and production cost.

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](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 based on each type of version.

#### 15. Reasons for Change in Burden

This information collection renewal resulted in an increase in burden hours due to an increase in the number of responses received for the period(s) 2021, 2022 and 2023.

#### 16. Publication of Results

The results of this information collection will not be published.

#### 17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

#### 18. Exceptions "Certification for Paperwork Reduction Submissions"

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