

SUPPORTING STATEMENT – PART A
TIME RECORD (WORK STUDY PROGRAM)
OMB CONTROL NUMBER 2900-0379

Summary of Changes from Previously Approved Collection

- Time Record (Work Study Program).
- This information collection renewal resulted in a decrease in burden hours due to a decrease in the number of responses received for the period(s) 2021, 2022 and 2023, This submission is therefore being submitted as a Revision.
- 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 Work Study allowance to Veterans and other eligible individuals pursuing approved programs of education under Chapters 30, 31, 32, 33, and 35 of title 38, and title 10 U.S.C. Chapter 1606. The VA Form 22-8690 is a time record/sheet report used by a supervisor and an eligible individual to record and report the number of hours completed by the student. The form should be submitted after the student completes at least 50 hours of work.

The following administrative and legal requirements necessitate the collection:

- A. Title 38 United States Code §3485.
- B. Title 38 Code of Federal Regulations §21.272 and §21.4145.

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

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.

This form is not available for use through the internet by the general public due to the risk of fraud. However, the form is available in a fillable format on the VA intranet (internal form) website to be sent for both the supervisor and the Work Study student to complete and submit to the Muskogee Regional Processing Office for 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. The form must be submitted for any student receiving Work Study benefits. The information provided must be uniform and consistent regardless of the size of the school or other reporting organization.

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 Work Study 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 publications 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, June 10, 2024. The 60-Day FRN citation is Volume 89, FRN No 112, Page 48965. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Wednesday, Aug, 21, 2024. The 30-Day FRN citation is Volume 89, FRN No 162, Page 67718.

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 22-8690 is retained permanently in the claimant's electronic education folder. 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. Estimation of Respondent Burden:

VA Form 22-1999

[VA Enrollment Certification]

There was a total of 216,813 "Work Study Time Sheet Record" instruments received for calendar years 2021, 2022 and 2023, resulting in an average annual receipt of 72,271 responses. The result calculates to a total of 6,022 burden hours.

- a. **Number of Respondents:** 72,271.
- b. **Frequency of Response:** Occasionally.
- c. **Annual Burden Hours:** 6,022 hours (72,271 x 5min. / 60 min.).
- d. **Estimated Completion Time for Respondent:** 5 minutes.

e. The respondent population for the VA Form 22-8690 is comprised VA beneficiaries participating in the VA Work Study Program and their supervisors at facilities such as educational institutions, VA regional offices, VA medical centers, State and national Veterans cemeteries and congressional offices. These respondents verify the actual number of hours worked by a Work Study student and submits the form to VA on their behalf. 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 \$189,572.56. (6,022 burden hours X \$31.48 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: \$480,963.50.

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Number of Respondents	Total
7	5	15min	\$26.62	\$6.65	72,271	\$480,963.50 (72,271 X \$26.62 X 15min/60min)
Overhead at 100% Salary						\$480,963.50
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						\$480,963.50
Printing and Production Cost						-0-
Total Cost to Government						\$480,963.50

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.

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

There was a decrease in the burden hours due to a decrease in the number of Work Study Time Records received in 2021, 2022 and 2023.

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.