SUPPORTING STATEMENT

FOR OMB CONTROL NUMBER 2900-0154

- APPLICATION FOR VA EDUCATION BENEFITS VAF 22-1990;

- APPLICATION FOR FAMILY MEMBER TO USE TRANSFERRED BENEFITS VAF 22-1990E;

- APPLICATION FOR VA BENEFITS UNDER THE NATIONAL CALL TO SERVICE PROGRAM VAF 22-1990N

Justification.

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

To receive VA Educational Assistance Allowance under chapters 30, 32 and 33 of title 38, U.S.C., chapter 1606 of title 10, U.S.C., and sections 903 of P. L. 96-342, Veterans, Service members, and Reservists must complete the VA Form 22-1990 Application for Education Benefits.

The following administrative and legal requirements necessitate the collection:
38 U.S.C. Sections 3034; 3241, 3323(a), 3471, 5101(a); P.L. 96-342, Section 903; and 10 U.S.C. Section 16131.

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.

Applicants complete and submit the Application for Education Benefits, VA Form 22-1990; National Call to Service (NCS), VA Form 22-1990N, or the Transfer of Entitlement (TOE), VA Form 22-1990E to file their claim for VA education benefits, which all have different eligibility requirements. The information requested on each of these forms helps VA to determine the applicant's eligibility to education benefits.

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 helping to reduce the burden. The online electronic collection is available via the Va.gov application portal, which has been implemented using algorithms that now helps guide the applicant more thoroughly toward completing the application based on the responses they provide for the questions being asked. The implementation and use of Va.gov helps to reduce the burden while continuing to enable the claimant to submit the application directly to the Regional Processing Office (RPO) with jurisdiction over the claim, thus reducing potential errors, and speeding up the application process.

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.

Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information collection only involves individuals (Veterans, Service persons, Reservists, and some dependents). There is no impact on small businesses or other small 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.

If this information is not collected, or is collected less frequently, VA could not pay education benefits. There are no technical or legal obstacles to reducing the burden.

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.

There is no special circumstance requiring collection in a manner inconsistent with

5 CFR 1320.6 guidelines.

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.

The Department notice was published in the Federal Register on December 2, 2022, Volume 87, No. 231, pages 74214. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

VA does not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The VA Forms 22-1990,1990N, and 1990E are retained permanently 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. 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.

None of the questions on the application are of a sensitive nature.

12. Estimate of the hour burden of the collection of information. Please show mathematical calculations:

The estimated annual burden hours, as indicated below, for the collection of this information is 170,780 **burden hours**, calculated based on the total number of paper and electronic responses of 2,049,368 that were received for 2019, 2020, and 2021.

      a. Number of Respondents: 683,122 (2,049,368 / 3 years)

      b. Frequency of Response: Once

MATHMATICAL CALCULATIONS FOR THE ABOVE AND BELOW BURDEN FIGURES

c. Annual Burden Hours (Va.gov): 119,546 (478,186 X 15 / 60 = 119,546)
   Annual Burden Hours (Paper):   51,234 (204,936 X 15 / 60 =   51,234)

d. Estimated Completion Time for both Electronic and Paper: 15 minutes.

e. The respondent population for VA Forms 22-1990, 1990E and 1990N is composed of individuals who are Veterans, Service members, Reservists and dependents. VBA cannot make further assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the collection.

Type of Submission	%	Number of Respondents	Minutes Each	Burden Hours
VA.gov (elec)	70%	478,186	15	119,546
Paper	30%	204,936	15	51,234
Total Burden Hours	100%	683,122	N/A	**170,780**

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are $1,120.40. Assuming a forty (40) hour work week, the **mean hourly wage is $28.01 based on the BLS wage code – "00-0000 All Occupations." ($28.01 X 40 hours). This** information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm May 2021.

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 4,783,547 (170,780 X $28.01 per hour).

13. Provide estimates 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).

This submission does not involve any record keeping costs.

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: $10,278,606.44

Grade	Step	Burden Time Employee	Hourly Wage Rate	N/A	Cost for Response on Paper Application/Scanning	**Gov. Cost**
Clerk-GS 06	05	5min	$22.82	N/A	204,936	**$389,719.96** (204,936 X $22.82 X 5 / 60)
Grade	Step	Burden Time Employee	Hourly Wage Rate	N/A	Total Electronic Responses	
VCE-GS 09	05	40min	$31.02	N/A	478,186	**$9,888,886.48** (478,186 X $31.02 X 40 / 60)
	Overhead at 100%. Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.					**$10,278,606.44**
_	**Processing / Analyzing Cost**					**$10,278,606.44**
	Printing and Production Cost					$0
Total Cost to Government for Processing All Applications (Paper-Electronic) **$10,278,606.44**						

Note: The hourly wage information above is based on the hourly 2023 General Schedule (Base) Pay. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf

The processing time estimates above are also 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 renewal of this information collection resulted in a decrease in burden hours based on a reduction in the annual average number of responses received for the periods 2019, 2020 and 2021.

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 by the Veterans Benefits Administration does not employ statistical methods. If statistical methods are employed, Part B of a Supporting Statement must be completed.