

## Supporting Statement - Part A

### *Request for Approval of School Attendance and School Attendance Report* Control #2900-0049

#### Summary of Changes from Previously Approved Collection

- This request is a “revision” due to the respondent burden increasing due to the estimated number of receivables averaged over the past year.
- No comments were received during the 60-Day comment period

#### **1. Need for the Information Collection**

The Department of Veterans Affairs (VA) through its Veterans Benefits Administration (VBA) administers an integrated program of benefits and services, established by law, for Veterans, service personnel, and their dependents and/or beneficiaries. Information is requested by VA Forms 21-674 and 674c, *Request for Approval of School Attendance*, and VA Form 21-674b, *School Attendance Report*. Under the authority of 38 U.S.C. 101 (4)(A), recipients of disability compensation, dependency and indemnity compensation, disability pension, and death pension are entitled to benefits for eligible children between the ages of 18 and 23 who attend approved courses of education or training. Regulatory authority is found in 38 C.F.R. 3.277 and 3.667.

#### **2. Use of the Information**

The respondent population for VA Forms 21-674, 21-674b, and 21-674c is composed of individuals providing the necessary information for a child who attends an approved course of instruction or training between the ages of 18 and 23.

As such, this collection of information is used to report any changes in entitlement factors, including marriage, a change in course of instruction, and termination of school attendance.

#### **3. Use of Information Technology**

VA Forms 21-674, 21-674b, and 21-674c are available on the One-VA Website in a fillable electronic format. VBA is currently hosting these forms on a secure server and does have the technology in place to allow for the complete submission of the forms. Validation edits are performed to assure data integrity. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.

#### **4. Non-Duplication**

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

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**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**

VA Forms 21-674 and 21-674c are used to gather information that is necessary to determine benefit entitlement to or for a veteran's child between the ages of 18 and 23 who is attending school. VA Form 21-674b is used to verify the school attendance of a child who is receiving benefits or for whom benefits are being received. Without this information, VA would be unable to properly authorize benefits for school attendance.

Additionally:

- VA Forms 21-674 and 674c are used by recipients of pension to report the child's income.
- VA Form 21-674c is used as a computer-generated version of the series and is automatically dispatched from VA's central computer system approximately three months before a child's 18<sup>th</sup> birthday, and
- VA Form 21-674b is used to confirm the school attendance of a child.

**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 Thursday, August 15, 2024. The 60-Day FRN citation is 89 FRN 66506.

No comments were received during the 60-Day comment period.

A 30-Day Federal Register Notice for the collection published on Monday, October 21, 2024. The 30-Day FRN citation is 89 FRN 84254.

Part B: CONSULTATION

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

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#### **9. Gifts or Payment**

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

#### **10. Confidentiality**

The records are maintained in the appropriate Privacy Act System of Records identified as “Compensation, Pension, Education, and Veteran Readiness and Employment Records-VA (58VA21/22/28),” published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

#### **11. Sensitive Questions**

No questions considered sensitive are being asked in this collection.

#### **12. Respondent Burden and its Labor Costs**

- a. Number of Respondents is estimated at **79,310** per year.
  - i. 46,691 for VA Form 21-674,
  - ii. 22,694 for VA Form 21-674b, and
  - iii. 9,925 for VA Form 21-674c.
- b. Frequency of Response is one time.
- c. Annual burden hours are 15,862 hours.
- d. The average estimated completion time is 12 minutes.
  - i. 15 minutes for VA Form 21-674,
  - ii. 5 minutes for VA Form 21-674b, and
  - iii. 15 minutes for VA Form 21-674c.
- e. VA 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 uses general wage data to estimate the respondents’ costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$31.48 based on the BLS wage code – “00-0000 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).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing

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the information collection. VBA estimates the total cost to all respondents to be \$499,335.76 (15,862 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. Costs to the Federal Government**

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	10	0.17	\$21.45	3.575	79,310	\$ 283,533.25
Overhead at 100% Salary							\$ 283,533.25
9	3	5	0.08	\$26.24	2.187	79,310	\$ 173,424.53
Overhead at 100% Salary							\$ 173,424.53
11	3	5	0.08	\$31.74	2.645	79,310	\$ 209,774.95
Overhead at 100% Salary							\$ 209,774.95
Processing / Analyzing Costs							\$ 1,333,465.47
Printing and Production Cost							\$ 14,816.28
Total Cost to Government							\$ 1,348,281.75

Overhead costs are 100% of salary and are the same as the wage listed above and the amounts are included in the total.

Printing and production costs approximates the cost of printing this information collection per year. (Processing/Analyzing Cost total divided by \$90).

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay ([Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/salaries/)). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

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**15. Reason for Change in Burden**

The respondent burden increased due to the estimated number of receivables averaged over the past year.

**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 to “Certification for Paperwork Reduction Submissions”**

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