

SUPPORTING STATEMENT – PART A

Application for VA Education Benefits, VA Form 22-1990
Application for Family Member to Use Transferred Benefits, VA Form 22-1990E
Application for VA Benefits Under the National Call to Service Program, VA Form 22-1990N - OMB Control Number 2900-0154

Summary of Changes

- Application for VA Education Benefits
- Application for Family Member to use Transferred Benefits
- Application for VA Benefits under the National Call to Service Program.
- This renewal submission makes significant revisions to the Application for Education Benefits, VA Form 22-1990. The major purpose for the revisions is due to the “Digital-GIB (DGIB) Modernization and Automation” efforts the agency has recently implemented to automate original claims processing through the new VA.gov electronic application submission portal, as was recently also part of the agency’s burden decrease initiative reported to OMB in 2023.
- Removed all references to Chapter 32, VEAP benefits and related information.
- Question #2 - Change the Question from Sex of Applicant to Gender of Applicant.
- Application – Exchange Question Boxes to Open Text Space.
- Question 6 – Ask for Mobile Telephone Number first. Change the Direct Deposit (EFT) information to inform that any bank account information entered will now apply to any other benefit with the exception VA Health Benefits (VHA).
- Removed the VA Date Stamp.
- Removed the “attach a voided check” verbiage from Question #7 EFT.
- Removed All of PART III – Type and Program of Education or Training (e.g., Flight, National Tests, Licensing and Certification, Apprenticeships and OJT and T/Assistance (Top-Up) information)), and for students to specify their career objective.
- Removed Part IV.
- Deleted Part V which asks the applicant if they hold any FAA Flight Certificates, the applicants’ education information after high school, and about employment before and after military training.
- Removed Questions 22 and 23 regarding GETA (Government Employees Training Act benefits) or Tuition Assistance (Top-Up).
- No comments were received during the 60-Day Comment Period
- Removed the NOTE in PART VII since we no longer send out any VA Pamphlets.
- Removed PART VII – Marital and Dependency Status information.

- Deleted the second part of PART IX – applicant reminders.
- Updated the Jurisdiction Map to Add American Samoa and Mariana Island.
- This renewal is considered a revision as it resulted in an annual average decrease to the number of responses received for the periods 2022 and 2023.
- The estimated burden completion time will reduce from 15 to 10 minutes for both the paper and electronic versions, which will be accounted for during the next renewal period.
- The renewal for this information collection results in a decrease in burden hours based on a reduction in the annual average number of responses received based only on two years of data which is for the periods 2022 and 2023 and is therefore being submitted as a Revision.
- No comments were received during the 60-day public comment period.

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 and 33 of title 38, U.S.C., and chapter 1606 of title 10, U.S.C., 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; 3323(a), 3471, 5101(a); 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. In 2022, VA built a computer platform entitled "My Education Benefits" (MEB). The MEB electronic platform allows

Veterans to submit their VA Form 22-1990 “Application for Education Benefits” and VA Form 22-1990E, “Application for Family Member to Use Transferred Benefits” to VA. The MEB system is currently only available for Chapter 33 Post-9/11 applicants, but efforts are in place to add the Chapter 30 and 1606 program for claims processing. For now, all other Veterans may continue to use the VA.gov electronic platform to submit application for those programs.

When the VA Form 22-1990 application is received, the MEB pre-fills the applicant’s information into the portal based on historical data VA already has. Upon completion of the pre-filled information, e.g., service history, address, date of birth, etc.; it allows the claimant to make changes to the answers (if needed). This automation helps to reduce the burden because if the pre-filled information is correct, and no changes are necessary, the MEB can automatically generate an eligibility determination.

The VA Form 22-1990 is currently being substantively revised by removing certain questions such as asking for previous education and training, employment history, previous benefits received, and future education or training plans. VA leadership has determined those questions were not required in order to make an eligibility determination. Individuals unable to use MEB may use the VA.gov electronic platform to submit their VA Forms 22-1990 and 22-1990E. Both platforms have the same required questions and allows applicants to provide answers only to certain questions based on the benefit sought, thus allowing the applicant to skip inapplicable questions: skipping those unrelated questions allows Veterans Claims Examiners to process the application quicker and more efficiently and helps to reduce the burden on the claimant.

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.

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.

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, September 9, 2024. The 60-Day FRN citation is Volume Number 89 FRN 73192.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Friday, November 15, 2024. The 30-Day FRN citation is Volume Number 89, FRN 90395.

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 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. 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 22-1990

[APPLICATION FOR VA EDUCATION BENEFITS]

VA FORM 22-1990E

[APPLICATION FOR FAMILY MEMBER TO USE TRANSFERRED BENEFITS]

VA FORM 22-1990N

[APPLICATION FOR VA BENEFITS UNDER THE NATIONAL CALL TO SERVICE PROGRAM]

The number of respondents who submitted the application(s) for educational assistance benefits for the periods 2022 and 2023 were a total of 291,669. This figure, if divided by two (2) years of respondent data renders an average of 145,834 responses received annually. This number of responses received equates to 36,458 burden hours for both paper and electronic receipt of the forms. The program office will account for the 10-minute burden change upon next renewal or revision since we are accounting for the burden based on 2022, 2023 data only.

- a. Number of Respondents: 145,834 (291,669 / 2 years)
- b. Frequency of Response: Once
- c. Annual Burden Hours (Va.gov-elec.): 25,521 (102,084 X 15 / 60 = 25,521)

Annual Burden Hours (Paper): 10,937 (43,750 X 15 / 60 = 10,937),

Total Burden Hours = **36,458**.

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

Type of Submission	%	Number of Respondents	Minutes Each	Burden Hours
VA.gov (elec.)	70%	102,084	15	25,521
Paper	30%	43,750	15	10,937
Total Burden Hours	100%	145,834	N/A	36,458

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.

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 \$1,259.20. Assuming a forty (40) hour work week, the **mean hourly wage is \$31.48 based on the BLS wage code – “00-0000 All Occupations.” (\$31.48 X 40 hours)**. 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 \$1,147,697.84 (36,458 burden hours x \$31.48 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).

There are no overhead costs to respondents other than the labor 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: \$2,194,295.02

VA FORM 22-1990

[APPLICATION FOR VA EDUCATION BENEFITS]

VA FORM 22-1990E

[APPLICATION FOR FAMILY MEMBER TO USE TRANSFERRED BENEFITS]

VA FORM 22-1990N

[APPLICATION FOR VA BENEFITS UNDER THE NATIONAL CALL TO SERVICE PROGRAM]

<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>N/A</u>	<u>Cost for Response on Paper Application/Scanning</u>	<u>Gov. Cost</u>
<u>Clerk- GS 06</u>	<u>05</u>	<u>5min</u>	<u>\$22.82</u>	<u>N/A</u>	<u>43,750</u>	<u>\$83,197.91</u> <u>(43,750 X</u> <u>\$22.82 X 5 / 60)</u>
<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>N/A</u>	<u>Total Electronic Responses</u>	
<u>VCE- GS 09</u>	<u>05</u>	<u>40min</u>	<u>\$31.02</u>	<u>N/A</u>	<u>102,084</u>	<u>\$2,111,097.12</u> <u>(102,084</u> <u>X \$31.02 X 40 /</u> <u>60)</u>
	<u>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.</u>					<u>\$2,194,295.02</u>
	<u>Processing / Analyzing Cost</u>					<u>\$2,194,295.02</u>
	<u>Printing and Production Cost</u>					<u>\$0</u>
Total Cost to Government for Processing All Applications (Paper-Electronic)						<u>\$2,194,295.02</u>

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 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 for this information collection results in a decrease in burden hours based on a reduction in the annual average number of responses received based only on two years of data which is for the periods 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 instruments.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

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