

SUPPORTING STATEMENT – PART A

Application for Reimbursement of National Exam Fee– OMB 2900-0706

Summary of Changes from Currently Approved Collection

- The ICR is associated with rulemaking RIN 2900-AQ88
- Increased Annual Burden
- Updated Total Cost to all Respondents
- Updated Cost to Government

1. Need for the Information Collection

Public Law 108-454 and Public Law 111-377 authorize the Department of Veterans Affairs (VA) to reimburse claimants for the amount of the fees charged for national tests for admission, and national exams for credit. Section 106 of Public Law 108-454 allows eligible persons under chapters 30, 32, and 35 of title 38, U.S.C., and chapters 1606 of title 10 U.S.C., to receive reimbursement for approved national tests for admission to Institutions of Higher Learning (IHLs) or graduate schools, as well as national tests that provide an opportunity for course credit at IHLs.

Section 108 of Public Law 111-377 allows eligible persons under chapter 33 of title 38, U.S.C., to receive reimbursement for a national test for admission and national tests for credit. As required under 38 U.S.C. 5101, and 38 C.F.R. Section 21.1030, an eligible individual must apply to VA in order to receive an education benefit administered by VA. VA has developed VA Form 22-0810, “Application for Reimbursement of National Test Fee”, for claimants’ use in submitting information necessary to receive reimbursement for their national test fees.

2. Use of the Information

VA will use the information collected to determine whether the claimant qualifies to receive reimbursement for a claimed national test, and if so, the amount of the reimbursement of the fee charged.

3. Use of Information Technology

Information is collected when the student applies for reimbursement of the fees required to take the national test. An electronically fillable format of VA Form 22-0810 is available on VA’s GI Bill website for the claimant to fill out, print, and submit to VA.

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

If this information is not collected, VA will not be able to adjudicate the reimbursement of national test fees as required by statute.

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

A. Public Comments

The associated proposed rule, RIN 2900-AQ88, was published in the Federal Register on May 24, 2023, Volume 88, Number 100, page 33672. No comments pertaining to the collections of information were received in response to this notice.

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 22-0810 is retained permanently in the claimant's 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 are contained in the Privacy Act Issuances, 2012 Compilation.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

VA Form 22-0810

Application for Reimbursement of National Exam Fee

- a. Number of Respondents: 310
- a. Frequency of Response: Once
- b. Annual Burden Hours: 78 [310 X 15 min / 60min = 78]
- d. Estimated Completion Time: 15 minutes

e. The respondent population is Veterans 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 the educational background and wage potential of respondents. Therefore, VBA used 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

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 \$2,440 (310 responses per year x 15 minutes per application x \$31.48).

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

Application for Reimbursement of National Exam Fee
VA Form 22-0810

<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>Cost per Response</u>	<u>Total Responses</u>	<u>Gov. Cost</u>
09	05	15 minutes	\$32.56	\$8.14	310	\$2,523.40 (310 X \$32.56 X 15 / 60)
	Overhead at 100%. Overhead costs are 100% of salary and are also the same as the wage listed above; and the amount is included in the total.					-0-
	Processing / Analyzing Cost					\$2,523.40
	Printing and Production Cost					-0-
Total Cost to Government						\$2,523.40

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx

Note: The hourly wage information is based on the hourly 2024 General Schedule Pay.

15. Reasons for Change in Burden

The burden has increased since the previous approval due to a provision in the associated rulemaking, RIN 2900-AQ88, which constituted an increase in the estimated number of respondents, resulting in an increase in the reporting burden hours.

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 for OMB approval on the collection instrument.

18. Exception to Certification for Paperwork Reduction Act Submissions

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