

## SUPPORTING STATEMENT – PART A

### Application for Reimbursement of Licensing or Certification Test Fees OMB 2900-0695

#### 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 the Federal Government

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

Statute requires that an individual who desires a benefit the Department of Veterans Affairs (VA) administers must apply to VA for that benefit (38 U.S.C. 5101(a)). The collection of information is necessary to apply 38 U.S.C. 5101(a) and 38 U.S.C. 3689 (which is applicable pursuant to 38 U.S.C. 3034(a), 3241(a), 3323, 3471, and 3513) to claims for educational assistance reimbursement for licensing or certification test fees under the various educational assistance programs VA administers.

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

VA will use the information collection specific to licensing or certification test reimbursement to decide whether the claimant should be reimbursed the amount of the fee charged for taking a licensing or certification test and the amount.

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

Currently, the application for reimbursement of licensure or certification test fees is only available in a paper format which can be accessed, fillable and printable through [www.va.gov](http://www.va.gov). However, VA is reviewing how information technology could reduce the burden. When available, the online electronic collection will be made via the [va.gov](http://va.gov) electronic application portal, which will include algorithms to help guide the applicant toward completing the application based on their responses to the questions being asked.

#### **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 was not collected or collected less often, VA would not be able to determine who is eligible for reimbursement of licensing or certification test fees or the amount that should be paid to those who are eligible; and if this information is collect less often, VA would be unable to administer benefits in a timely and accurate manner.

## **7. Paperwork Reduction Guidelines**

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

## **8. Consultation and Public Comments**

### Part A

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.

The Department notice was published in the Federal Register on October 27, 2021, Volume 86, No. 205 page 59449. No comments were received.

### Part B

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

## **9. Gifts or Payments**

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

## **10. Confidentiality**

VA Form 22-0803 is retained in the student's electronic 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 is contained in the Privacy Act Issuances, 2012 Compilation.

## **11. Sensitive Questions**

No questions considered sensitive are being asked in this collection.

## 12. Respondent Burden and its Labor Costs

VA Form 22-0803 Application for Reimbursement of Licensing or Certification Test Fees

- a. Number of Responses: 12,630 (Respondents: 4,210)
- b. Frequency of Response: Occasionally (3 per year)
- c. Annual Burden Hours: 3,158 hours (12,630 X 15/60)
- d. Estimated Completion Time for Respondent: 15 minutes
- e. The respondent population for the VA Form 22-0803 consists of beneficiaries who are pursuing approved licensure or certification tests. 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 (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 the information collection. VBA estimates the total cost to all respondents to be \$99,398 (3,158 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. Cost to the Federal Government

Grade	Step	Burden Time Employee	Hourly Rate	Cost per Response	Total Responses	Total
09	05	20 min	\$32.56	\$10.85	12,630	\$137,078
Overhead at 100% Salary						\$137,078

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	\$137,078
Printing and Production Cost (Maintenance Cost)	\$0
<u>Total Cost to Government</u>	\$137,078

**Note:** The hourly wage information above is based on the hourly 2024 General Schedule Pay. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx)

**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 of the OMB approval on the collection instrument.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

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