

## SUPPORTING STATEMENT – PART A

OMB 2900-0154

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)

### 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**

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. Use of the Information**

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. Use of Information Technology**

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. 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 VA educational benefits 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 December 2, 2022, Volume 87, No. 231, pages 74214. 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**

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. Sensitive Questions**

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

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

- a. Number of Respondents: 810,000
- b. Frequency of Response: Once
- c. Annual Burden Hours (Va.gov): 189,000 ( $567,000 \times 20 / 60 = 189,000$ )  
Annual Burden Hours (Paper): 60,750 ( $243,000 \times 15 / 60 = 60,750$ )  
Annual Burden Hours Total: 249,750
- d. Estimated Completion Time: 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.

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 \$7,862,130 (249,7500 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 Wage Rate	N/A	Cost for Response on Paper Application/Scanning	Gov. Cost
Clerk-GS 06	05	5min	\$23.96	N/A	243,000	<b>\$485,190</b> (243,000 X \$23.96 X 5 / 60)
Grade	Step	Burden Time Employee	Hourly Wage Rate	N/A	Total Electronic Responses	
VCE-GS 09	05	40min	\$32.56	N/A	567,000	<b>\$12,307,680</b> (567,000 X \$32.56 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.					<b>\$12,792,870</b>
	<b>Processing / Analyzing Cost</b>					<b>12,792,870</b>
	Printing and Production Cost					<u>\$0</u>
<b>Total Cost to Government for Processing All Applications (Paper-Electronic)</b>						<b>\$12,792,870</b>

**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.