

SUPPORTING STATEMENT – PART A

OMB 2900-0073

VA Enrollment Certification

VA FORM 22-1999

Summary of Changes from Currently Approved Collection

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

1. Need for the Information Collection

The Department of Veterans Affairs (VA) is authorized to pay educational benefits to Veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35, title 38, U.S.C., section 510 and chapter 1606 of title 10, U.S.C., and section 903 of Public Law 96-342. Educational institutions and training establishments are required to use the VA Form 22-1999, Enrollment Certification, to report to VA, without delay, the information concerning the enrollment or reenrollment into the training of Veterans, Service members, Reservists, and other eligible individuals. In certain instances, the enrollment certification is used by VA to authorize and make payments in advance if the student requests an advance payment. In other instances, VA is authorized to make lump sum payments of up to 60% of a beneficiary's tuition and fees if they request an accelerated payment. In these cases, VA Form 22-1999 serves as the student's request for an accelerated payment as well as for the educational and/or training institution's report of the student's enrollment.

The following administrative and legal requirements necessitate the collection:

- A. 38 U.S.C. 3034, 3241, 3323, 3680; and 3684, 10 U.S.C. 16136.
- B. 38 CFR 21.4203, 21.5200(d), 21.7152, 21.7652, and 21.9720.

2. Use of the Information

VA uses the information collected on VA Form 22-1999 to determine the amount of educational benefits payable to the student during the period of enrollment or training. Additionally, with the exception of chapter 33, VA also uses these forms to determine whether the student has requested an advance payment or accelerated payment of

benefits. Without this information, VA would not have a basis upon which to make payment or to know if a person was requesting an advance or accelerated payment.

3. Use of Technology

Information technology is being used to reduce the burden as the form associated with this collection is now available in an electronically fillable format and is submitted through the new VA electronic submission portal “Enrollment Manager” (EM). EM is the online system used to certify VA students and trainees. EM use is mandatory. Access must be requested and granted before SCOs can submit it through EM for automated processing.

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

VA would not be able to pay benefits for training if this information were not collected.

7. Paperwork Reduction 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

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.

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

When the school responds, the information provided is retained permanently in the student's education folder and in Enrollment Manager. 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 is 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

VA Form 22-1999 VA Enrollment Certification

- a. Number of Responses: 3,799,847.
- b. Frequency of Response: Occasionally,
- c. Annual Burden Hours: 633,307 hours (3,799,847 x 10min. / 60 min.).
- d. Estimated Completion Time for Respondent: 10 minutes

e. The respondent population for the VA Form 22-1999 consists of School Certifying Officials who submit the form on behalf of Veterans and eligible beneficiaries 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 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 gathers information on full-time wage and salary workers. According to the latest available BLS data, the median hourly wage is \$31.48 based on the BLS wage code of "00-000-0000 for "All Occupations." 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 \$19,936,531 (3,799,847 responses X 10 minutes per application X \$31.48 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeeping resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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. 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 Labor Costs to the Federal Government: \$16,496,393.76.

[VA Enrollment Certification, VA Form 22-1999]

The processing time estimates below are based on the actual amount of time employees of the grade level spend to process to completion a claim received on this form. It is estimated that only 40% of responses received are processed by the GS-9/5 employee. (total responses of 3,799,847 X 40%) = 1,519,938.

Grade	Step	Burden Time-VA Employee	Hourly Rate	Cost Per Response	Total Responses 3,799,847	Total
9	5	20 min.	\$32.56	\$10.85	1,519,938 (@ 40% manually processed)	\$16,496,393.76 (1,519,938 X \$32.56 X 20 min. / 60 min.)
Overhead at 100% Salary						\$16,496,393.76
Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.						
Processing / Analyzing Costs						\$16,496,393.76
Printing and Production Cost						\$0
Total Cost to Government						\$16,496,393.76

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay. 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 not changed since the previous approval.

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.