

## SUPPORTING STATEMENT – PART A

### YELLOW RIBBON PROGRAM AGREEMENT VA Form 22-0839, VA Form 22-10275

OMB 2900-0718

#### 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**

Public Law 110-252 authorizes the Department of Veterans Affairs (VA) to administer an education benefit program known as the Post-9/11 GI Bill. Section 3317 of title 38, United States Code, establishes the Yellow Ribbon G.I. Enhancement Program, referred to as the “Yellow Ribbon Program.” The Yellow Ribbon Program allows institutions of higher learning (IHLs) to voluntarily enter into an agreement with VA to waive a portion of the outstanding amount of established charges not otherwise covered under the Post-9/11 GI Bill. VA will match the amount waived by the IHL; however, VA’s portion will not exceed fifty percent of the total outstanding amount of established charges.

IHLs wishing to participate in the Yellow Ribbon Program are required to submit the Yellow Ribbon Program Agreement (VA Form 22-0839) indicating the maximum number of students that will receive benefits under the program, the maximum dollar amount of outstanding established charges that will be waived for each student based on student status (i.e., undergraduate, graduate, doctoral) or sub-element (i.e., college or professional school), and the way in which the contribution will be given (i.e., direct grant, scholarship, or other).

The Principles of Excellence were established in 2012 and allow schools to publicly proclaim their adherence to the guidelines therein that promote transparency and student success.

Title 38 U.S.C. 3317 necessitates this collection of information, along with Executive Order 13607.

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

VA will use the information collected from VA Form 22-0839 to determine which IHLs will be participating in the Yellow Ribbon Program, the maximum number of individuals for whom the IHL will make contributions in any given academic year, the maximum dollar amount of outstanding established charges that will be waived for each student based on student status (i.e., undergraduate, graduate, doctoral) or sub-element (i.e., college or professional school).

VA will use the information collected from VA Form 22-10275 to determine which schools have voluntarily elected to participate in the Principles of Excellence.

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

At this time, information technology cannot be used to reduce the burden. VA does not have the technology to obtain signatures electronically and cannot require all schools to use information technology to submit this information.

## **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**

A respondent need only file a Yellow Ribbon Agreement once therefore the burden cannot be decreased further. If the information is not collected, VA will not be able to administer the provisions of the Yellow Ribbon Program as mandated by statute. Similarly, a respondent needs only a single form to elect to participate in the Principles of Excellence.

## **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 notices were published in the Federal Register on June 30, 2022, Volume 87, Number 125, Pages 39161 and 39162. No comments were received from the public 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**

Our assurance of confidentiality is covered by 38 U.S.C. 5701.

VA published a System of Records Notice on July 19, 2012, covering our System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), 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**

- a. Number of Respondents: 5,600
- b. Frequency of Response: Once
- c. Annual Burden Hours: 78,400 hours (5,600 X 840min/60min)
- d. Estimated Completion Time: 14 hours or 840 minutes
- e. The respondent population for the VA Form 22-0839 and the new VA Form 22-10275 consists of school administrators seeking to participate in one or both voluntary programs. 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 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 2,468,032 (78,400 burden 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	Hourly Rate	Cost Per Response	Total Responses	Total
13	05	30 minutes	\$56.16	\$28.08	5,600	\$157,248
--	--	--	--	--	--	
Overhead at 100% Salary						\$157,248
<b>Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.</b>						
Processing / Analyzing Costs)						\$157,248
Printing and Production Cost						\$0
Total Cost to Government						\$157,248

**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)

REPORTING FEE INFORMATION: There is no cost to schools because VA pays each school that furnishes training under the various VA education programs a fee for processing all required VA reports or certifications for each veteran or other claimant. VA refers to these fees as "school reporting fees" which help schools to defray the costs of processing paperwork required to be submitted to VA. The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967 and are in 38 U. S. C. 3684

## **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**

VA will post the Yellow Ribbon Agreement Form to the GI Bill website by the second week of March in each calendar year. The deadline for completed agreements to be received by VA is May 15th of each calendar year (or the next business day if the 15th is a Saturday or Sunday). VA will publish the terms of the agreement via a link at [www.GIBILL.gov](http://www.GIBILL.gov).

VA will post the Principles of Excellence Form on the GI Bill website Find A VA Form | Veterans Affairs along with all other publicly available forms. The 22-10275 form will be available year-round. Participating schools are indicated in their school profile on the GI Bill Comparison Tool.

## **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.