

SUPPORTING STATEMENT – PART A
Notice of Change in Student Status
VA Form 22-1999b
OMB Control No. 2900-0156

Summary of Changes from Previously Approved Collection

- Title: Notice of Change in Student Status.
- There are no changes to the form with this submission.
- No comments were received in response to the 60-Day FRN.
- This information collection request (icr) was entered in ROCIS as a “Revision” due to a decrease in burden hours.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

The Department of Veterans Affairs (VA) is authorized to pay educational benefits to Veterans, persons on active duty, reservists, and other beneficiaries pursuing approved programs of education under chapters 30, 32, 33, and 35 of title 38, United States Code; and chapter 1606 of title 10, U.S.C.; the “Transfer of Entitlement” Provisions of Public Laws 107 and 110-252, the Veteran Rapid Retraining Assistance Program (VRRAP), Public Law 117-2, and the Veterans Employment through Technical Education Courses (VET-TEC) training program enacted under Public Law 115-48. Benefits are not payable when pursuit of a program is interrupted, terminated, or is not completed according to the regularly established policies and regulations of the educational institutions. Educational institutions are required to report without delay to VA, in the form prescribed by VA, the interruption or termination. VA Form 22-1999b serves as this report to VA of such changes in enrollment status.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3020, 3034(a), 3241, 3323(a), 3474, 3524, 3680(a), 3684(a); 10 U.S.C. 510, and 16136.
- b. 38 Code of Federal Regulations 21.4203, 21.5200(d), 21.5292(e)(2), 21.5812, 21.7156, 21.7656, 21.9720, and 21.9725, Public Law 117-2, and Public Law 115-48.

2. Indicate how, by whom, and for what purposes the information is to be used;

indicate actual use the agency has made of the information received from current collection.

The VA uses the information collected to determine whether the beneficiaries' educational benefits should be increased, decreased, or terminated, and the effective date of the change, if applicable. Without this information, VA might underpay or overpay benefits.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. Permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Information technology is being used to reduce the burden. The VA allows schools to submit the information using the new electronic submission portal, Enrollment Manager. This system replaced the previously used VA Online Certification of Enrollment (VA-ONCE). Ninety-five percent of the enrollment certifications received are submitted electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

If this information is not collected, eligible persons may be underpaid or overpaid. If the information is collected less frequently, it would impair VA's ability to prevent overpayments and under-payments of educational benefits.

7. Explain any special circumstances that would cause an Information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax

records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

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. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, December 10, 2024. The 60-Day FRN citation is Volume 89, FRN 99335. No comments were received during the 60-Day comment period.

A 30-Day Federal Register Notice (FRN) for the collection published on Thursday, February 20, 2025. The 30-Day FRN citation is Volume 90, FRN 10039.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Veteran Readiness and Employment Records – VA (58VA 21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions considered sensitive are being asked in this collection.

12. Estimate of the hour burden of the collection of information. If this request for approval covers more than one form, provide separate hour burden estimates for each form, and aggregate the hour burdens in Item 13 of OMB 83-I. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.

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As previously projected for the last renewal submission, we stated, after the ending of the COVID-19 pandemic, the total number of responses received would be drastically decreased. For this submission, there were approximately 3,168,692 responses incoming. This approximates to an average annual total number of responses of 792,173 over the course of four years of data; 2021, 2022, 2023 and 2024. The estimated annual burden for the collection of the information therefore renders 132,028 burden hours. This form continues to take 10 minutes to complete.

- a. Number of Responses: 792,173 (3,168,692 / 4years; 2021, 2022, 2023 and 2024).**
- b. Frequency of Response: On occasion.**
- c. Annual Burden Hours: 132,028 hours (792,173 X 10 minutes /60 minutes).**
- d. Estimated Completion Time for Respondent: 10 minutes.**

e. The respondent population for the VA Form 22-1999b consists of School Certifying Officials who submit the form on behalf of beneficiaries pursuing an approved program of education to which they have either increased, decreased, or terminated. 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 weekly earnings of full-time wage and salary workers is \$1,259.20. Assuming a forty (40) hour work week, 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 \$4,156,241 (132,028 burden hours X \$31.48 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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.

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Estimated Costs to the Federal Government: \$4,298,858

Grade	Step	Burden Time	Wage X Hr.	Cost Per Hr.	Total Responses	Total Gov Cost
09	05	10 min	\$32.56	\$5.42	792,173	\$4,298,858
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Overhead at 100% Salary						\$4,298,858
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						\$4,298,858
Printing and Production Cost						\$0
Total Government Cost						\$4,298,858

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

The processing time estimates above are based on the actual amount of time VA employees of the grade level spend to process the VA Form 22-1999b.

15. Explain the reason for any burden hour changes since the last submission.

The burden has decreased since the previous approval. For this approval, the decrease considers data for calendar year periods 2021, 2022, 2023 and 2024. As previously projected after the ending of the COVID-19 pandemic, the total number of responses received were drastically decreased. This information collection request is therefore being entered into ROCIS and submitted as a "Revision" due to the decrease in burden hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of this information collection will not be published.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

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