

SUPPORTING STATEMENT – PART A
Application for Approval of a Program in a Foreign Country
VA Form 22-0976 – OMB #2900-0853

Summary of Changes from Previously Approved Collection

- Application for Approval of a Program in a Foreign Country
- There are no changes to the form with this submission.
- The burden has decreased since the previous approval. For this approval, the decrease considers data for calendar year periods 2022, 2023 and 2024. This information collection request has therefore been entered into ROCIS as a “Revision” due to the decrease in burden hours.
- No comments received on the 60-day FRN.

A. Justification

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

Pursuant to CFR 21.4260, the Department of Veterans Affairs (VA) is the approving authority for all postsecondary courses in foreign countries under the benefit programs administered by the VA.

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 will use the information collected to determine if a program in a foreign country is approvable under CFR 21.4260. In order for a review and decision to be made, the VA needs supporting information from a foreign educational institution.

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.

After completing the form, foreign institutions will continue to download the VA Form 22-0976 from the GI Bill website and submit it via email to federal.approvals@va.gov

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, a decision regarding the approval of postsecondary courses in foreign countries will not be completed and VA students will not be eligible to receive benefits for educational pursuit. Collection of the information is the only way the VA may make a decision in regard to CFR 21.4260-

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 Wednesday, June 25, 2025. The 60-Day FRN citation is 90 FRN 27071.

No comments received during the 60-Day comment period.

A 30-Day Federal Register Notice (FRN) for the collection published on Thursday, August 28, 2025. The 30-Day FRN citation is 90 FRN 42066.

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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The average number of responses received for the years 2022, 2023, and 2024 were an annual average of 412 submissions. This results to a burden of the following:

- a. Number of Responses: 412 (1,238 / 3years; 2022, 2023 and 2024).-**
- b. Frequency of Response: Annually.**

c. Annual Burden Hours: 137 hours (412 X 20 minutes/60 minutes).

d. Estimated Completion Time for Respondent: 20 minutes.

e. The respondent population for VA Form 22-0976 for the Submission of School Catalogs to the Department of Veterans Affairs is composed of non-U.S. based Institutions of Higher Learning located in a foreign country.

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 \$1,306.40. Assuming a forty (40) hour work week, the median hourly wage is \$32.66 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 2024.

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 \$4,474.42 (137 burden hours X \$32.66 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: \$4,743.15.

<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>Cost per Response</u>	<u>Total Response s</u>	<u>Gov. Cost</u>
<u>11</u>	<u>10</u>	<u>15min</u>	<u>\$46.05</u>	<u>\$10.31</u>	<u>412</u>	<u>\$ 4,743.15</u> <u>(412 X \$46.05</u> <u>X 15min /</u> <u>60min)</u>
	<u>Overhead at 100%. Overhead costs are 100% of salary, which are also the same as the wage listed above; and the amount is included in the total.</u>					
	<u>Education Liaison Representative Processing / Analyzing Cost</u>					<u>\$ 4,743.15</u>
	<u>Printing and Production Cost</u>					<u>-0-</u>
	<u>Total Cost to Government</u>					<u>\$ 4,743.15</u>

Note: The hourly wage information above is based on the hourly 2025 General Schedule (Base) Pay. [Pay & Leave: Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/salaries-general/)

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 22-0976

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 2022, 2023 and 2024.

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.