

2025 SUPPORTING STATEMENT – PART A

AUTHORIZATION TO DISCLOSE PERSONAL INFORMATION TO A THIRD PARTY – EDUCATION BENEFITS

VA Form 22-10278
OMB 2900-0914

Summary of Changes from Previously Approved Collection

- Authorization to Disclose Personal Information to a Third Party – Education Benefits
- There are 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.

The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for Veterans, service members, and their dependents and/or beneficiaries. Information is requested by this form under the authority of 5 U.S.C. 552(b) and 38 U.S.C. 5701 as implemented by 38 CFR 1.576(b).

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 Form 22-10278 is used to release information in its custody or control in the following circumstances: where the individual identifies the particular information and consents to its use; for the purpose for which it was collected, or a consistent purpose (i.e., a purpose which the individual might have reasonably expected). By law, VA must have a claimant’s or beneficiary’s written permission (an "authorization") to use or give out claim or benefit information for any purpose that is not contained in VA’s System of Records, 58VA21/22/28 Compensation, Pension, Education and Veteran Readiness

and Employment Records-VA. The claimant or beneficiary may revoke the authorization at any time, except if VA has already acted based on the claimant's permission.

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.

The VA Form 22-10278 will be available on the VA.gov website in a fillable electronic format. The form can be submitted either electronically or mailed to the appropriate VA Regional Processing Office.

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.

This form is designed to permit the beneficiary the opportunity to authorize release of information specific to their claim or benefits to a designated third party. Without this form, such information cannot be released by VA.

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 Monday, June 30, 2025. The 60-Day FRN citation is 90 FRN 27907.

No comments were received during the comment period.

A 30-Day Federal Register Notice (FRN) for the collection published on Wednesday, September 3, 2025. The 30-Day FRN citation is 90 FRN 42675.

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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[Authorization to Disclose Personal Information to a Third Party – Education Benefits]

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: 322 (968 / 3years; 2022, 2023 and 2024).**
- b. **Frequency of Response: Once.**
- c. **Annual Burden Hours: 27 hours (322 X 5 minutes/60 minutes).**
- d. **Estimated Completion Time for Respondent: 5 minutes.**
- e. The respondent population for VA Form 22-10278 is composed of claimants or beneficiaries who authorize the VA to disclose information to an individual or organization. VA cannot make assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA uses general wage data 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 \$32.66 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: <https://data.bls.gov/oes/#/industry/000000>.

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 \$881.82 (27 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: \$890.59

<u>Grade</u>	<u>Step</u>	<u>Burden Time Employee</u>	<u>Hourly Wage Rate</u>	<u>Cost per Response</u>	<u>Total Responses</u>	<u>Gov. Cost</u>
9	5	5min	\$33.19	\$2.77	322	\$ 890.59 (322 X \$33.19 X 5min / 60min)
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.						\$890.59
Processing / Analyzing Cost						\$ 890.59
Printing and Production Cost						-0-
Total Cost to Government						\$ 890.59

Note: The hourly wage information above is based on the hourly 2025 General Schedule (Base) Pay. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/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 22-10278.

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.