

SUPPORTING STATEMENT FOR VA FORM 22-8873
OMB NUMBER 2900-0358

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay education benefits to veterans and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35 of title 38, U.S.C.; chapters 1606 and 1607 of title 10, U.S.C.; Section 903 of Public Law 96-342; and NCS (National Call to Service) (10 U.S.C., chapter 31, section 510). This information collection involves "change of program" and "unsatisfactory attendance, conduct, or progress" issues. 38 U.S.C. 3691 allows eligible persons to change their program of education and 38 U.S.C. 3474 addresses discontinuance for unsatisfactory conduct or progress.

2. VA uses the information provided from the current collection to ensure (1) that programs are suitable to a claimant's aptitudes, interests, and abilities and (2) that the cause of any past unsatisfactory attendance, progress, or conduct has been resolved. Without this information, VA could not determine further entitlement to education benefits.

3. VA has converted these forms into an electronic fillable format which is available on the Internet. The claimant can access the form electronically, complete it, and print it. The form would then need to be mailed to the VA. Information technology is not currently being used to reduce the burden because this form represents a relatively small collection of information.

4. VA is not aware of any duplication of this information collection.

5. This information collection involves only individuals that are eligible for VA education benefits. This information collection does not involve education institutions, small businesses, or other small entities.

6. Statute does not allow for further payment of educational assistance without the information collected on this form. Less frequent collection of this information would preclude VA's ability to determine whether further educational benefits can be authorized.

7. The collection of this information does not require any special circumstances.

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 46482 and 46483 of the Federal Register dated September 9, 2009. No comments were received.

9. VA does not provide any payment or gift to respondents.

10. After processing, VA Form 22-8873 is retained in the claimant's education folder. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28), which are contained in the Privacy Act Issuances, 2007 Compilation.

11. None of the questions on this form are considered to be of a sensitive nature.

12. The estimated annual burden for the collection of this information is 14,629 hours for 29,258 responses.

We based the number of annual responses on the projected number of students who will receive educational benefits for FY2010 and FY2011, estimated at a total of 731,461 per year. The increase in the number is based on the addition of a new program of education, chapter 33 of title 38, U.S.C. We estimate that approximately 4% of the total number of VA education applicants will complete this form per year and that each claimant will submit one of these forms per year. VA expects to receive 29,258 annual responses and expects the respondent to use thirty minutes per response in order to gather the information and complete the certification.

Based on 29,258 responses and an average completion time of 30 minutes, the total number of respondent hours will be 14,629 hours at a salary cost of \$15.00 per hour. The cost of the information collection activity is estimated to be \$219,435.

Summary of cost to the public:

Average Number of claims	4% Responses = Total Respondents	30 Minutes Per Response	Total Hours	Hrly Cost (\$15/Hr includes mail cost)
731,461	29,258	877,740	14,629	\$219,435

13. This submission does not involve any record keeping costs.

14. The annual cost to the government for administering these forms is estimated at \$247,754 based on 29,258 annual responses.

This cost is composed of the following:

a. Processing cost of \$246,938 is based on the salary of an adjudicator (GS-9 step 5 with an hourly salary of \$25.32), a processing time of 20 minutes per response, and a total of 29,258 responses.

b. Administrative and printing costs total \$ 816.

Summary of cost to the Federal Government:

Processing	\$246,938
Administrative Costs	\$ 816
TOTAL	\$247,754

15. There is an increase in burden since the last submission due to the increase in the total number of claimants expected to apply for education benefits under the Post 9/11 GI Bill.

16. VA does not publish this information or make it available for publication.

17. The collection instrument, VA Form 22-8873, may be reproduced and/or stocked by regional offices and training establishments. This form does not display an expiration date, and if required to do so, would result in unnecessary waste of existing stock of this form. As this form is submitted to OMB for approval every three years, this date requirement would result in an unnecessary burden on the respondents and would delay VA action on the benefit being sought. VA also seeks to minimize the cost to itself of collecting, processing, and using the information, by not displaying the expiration date. For these reasons, VA continues to seek an exception that waives the displaying of the expiration date on VA Form 22-8873.

18. This information collection fully complies with the requirements of 5 CFR 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.