

SUPPORTING STATEMENT FOR
APPLICATION FOR REIMBURSEMENT OF NATIONAL TEST FEE
(2900–0706)

A. Justification.

1. Public Law 108-454 authorizes the Department of Veterans Affairs (VA) to reimburse claimants for the amount of the fees charged for national tests for admission, and national exams for credit. Section 106 of Public Law 108-454 allows eligible persons under chapters 30, 32, and 35 of title 38, U.S.C., and chapters 1606 and 1607 of title 10, to receive reimbursement for approved national tests for admission to institutions of higher learning or graduate schools and national tests providing an opportunity for course credit at institutions of higher learning. As required under 38 U.S.C. 5101, and 21 CFR 1030, an eligible individual must apply to VA in order to receive an education benefit administered by VA. VA has developed VA Form 22-0810, Application for Reimbursement of National Test Fees, for claimants' use in submitting information necessary to receive reimbursement for national test fees.
2. VA will use the information collected to determine whether the claimant qualifies to receive reimbursement for a claimed national test, and if so, the amount of the reimbursement.
3. Information is collected when the student applies for reimbursement of the fees required to take the national test. An electronically fillable format of VA Form 22-0810 is available on VA's website for the claimant to fill out, print, and submit to VA.
4. VA is not aware of any duplication of this information collection.
5. The information collection for reimbursement of national test fees only affects individual claimants. There is no significant impact on education institutions or small businesses.
6. If this information is not collected, VA will not be able to administer the reimbursement of national test fees as required by statute.
7. The collection of this information does not require any special circumstances.
8. The Department notice was published in the Federal Register on October 7, 2010, page 62187. No comments have been received in response to our notice.
9. VA does not provide any gifts to respondents.
10. The application is retained in the claimant's electronic education folder. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Rehabilitation and Employment Records – VA (58VA21/22/28), contained in the Privacy Act Issuances, 2009 Compilation.

11. None of the information collected is of a sensitive nature.

12. The estimated annual burden for the collection of this information is 263 hours, submission by 700 respondents. To arrive at this number of respondents, we took the actual figure for claims submitted for national exam fees in fiscal year 2007, 2008 and 2009 and averaged the amounts. We also added 10% of this figure for claimants who would apply, but that would not be eligible. We estimate that each respondent will need 15 minutes to complete the request.

We anticipate that each respondent will submit an average of 1.5 tests per respondent. (700 responses x 1.5 responses x 15/60 = 263 hours).

The annual net cost to the public is \$3,540, based on \$15.00 x 263 burden hours.

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

14. The estimated cost to the Federal government is \$7,885. VA calculated this amount as follows:

A GS 9, step 5 claims examiner (\$28.04 hourly) needs 15 minutes to process the form. Multiplying the hourly rate of \$28.04 x 15 minutes = \$7,360 in processing costs.

We anticipate having mailing costs of \$493.50 per year based on mailing 1050 (44 cent per stamp, and 3 cents for each envelop = \$.47).

We anticipate having printing costs of \$31.50 for 1,050 forms with a cost of \$30 for printing 1,000 forms.

15. The annual burden hours increased due to the rise in individuals seeking reimbursement of national test fees.

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

17. The collection instrument, VA Form 22-0810, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date. It is anticipated that only a small number of these forms will be used each year. Reprinting the form to revise the expiration date would result in unnecessary waste of existing stocks of this form and unnecessary burden on the respondents, possibly delaying Department action on the benefit being sought. By not displaying the expiration date on this form, VA also seeks to minimize the cost of collecting, processing, and using the information. For these reasons, VA seeks an exemption from displaying the expiration date on VA Form 22-0810.

18. This information collection fully complies with all the requirements of 5 CFR 1320.9 and 1320.8(b) (3).

B. Collection of Information Employing Statistical Methods.

This collection of information by the Department of Veterans Affairs does not employ statistical methods.