

SUPPORTING STATEMENT FOR VA FORM 22-1995
OMB NUMBER 2900-0074

A. Justification.

1. Department of Veterans Affairs (VA) pays educational benefits to eligible veterans and persons on active duty (chapters 30, 32, and 33 of Title 38, United States Code, including section 903 of PL 96-342), and to persons in the Selected Reserve (chapters 1606 and 1607 of Title 10, U. S. Code). Each veteran, person on active duty, or person in the Selected Reserve must be pursuing an approved program of training to be eligible for benefits. The eligible student must complete VA Form 22-1995, Request for Change of Program or Place of Training, to identify and request approval for a change of program or place of training.

The following administrative and legal requirements necessitate the collection:

- a. 38 U.S.C. 3034, 3241, 3323, 3471, 3691, and 10 U.S.C. 16136(b), and 16162.
- b. 38 CFR 21.4234, 21.7114, 21.7614, 21.1030, 21.5030(c)(2), 21.5292(e)(2), 21.7030, and 21.7530.

2. VA uses the information requested on this form to determine the applicant's continued eligibility to educational assistance administered by the VA.

3. Information technology is being used to reduce this burden. Claimants have the option of using VONAPP (Veterans On-Line Application) to complete and submit the information via the Internet.

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

5. The information collection only involves individuals and has no impact on educational institutions or small businesses.

6. If this information is not collected VA would not be able pay education benefits to individuals who had a change of program or place of training. There are no technical or legal obstacles to reducing the burden.

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 was published on pages 67558-67559 of the FEDERAL REGISTER dated November 1, 2011. No comments were received in response to this notice.

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

10. VA Form 22-1995 is retained permanently in the student's education file. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation Records — VA (58VA21/22/28) which are contained in the Privacy Act Issuances, 2005 Compilation.

11. None of the questions on this application are considered to be of a sensitive nature.
12. The estimated annual burden for the collection of information is 35,804 hours for 116,120 responses.

a. The number of respondents and burden hours is determined as follows:

(1) The number of respondents/responses was determined using the FY 2009 Presidential Budget Submission estimate. Information in the FY 2009 budget estimates that an average of 580,600 trainees will train in educational assistance programs that require use of this form annually from FY 2009 through FY 2012. We estimate that approximately 20 percent of these respondents will complete this form each year for a total number of responses of 116,120.

(2) Each claimant has the option of filing this form either electronically or on paper. We estimate that it takes 20 minutes for the average claimant to complete and return the paper version of VA Form 22-1995. We estimate that it takes 15 minutes for the average claimant to complete and submit the electronic version of VA Form 22-1995. VA estimates that approximately 30 percent of claimants will submit the electronic version of the form annually from FY 2009 through FY 2012. See table below for an estimate of the burden hours for the electronic and paper submissions.

Type of Submission	%	Number	Minutes	Hours
electronic	30%	34,836	15	8,709
paper	70%	81,284	20	27,095
	100%	116,120		35,804

b. The annual cost to the public is \$537,060 based on 116,120 responses requiring 35,804 in burden hours of time at \$15.00 per hour.

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

14. The annual cost to the government for administering this form is estimated to be \$1,033,934.81. This cost is computed as follows:

a. VA estimates that it will take a GS-9, step 5 veterans claims examiner who makes \$28.04 per hour 20 minutes to process each paper application and 15 minutes to process each electronic application. The estimated annual cost of processing paper applications is \$759,734.45 and the estimated annual cost of processing electronic applications is \$244,200.36.

b. VA incurs a yearly maintenance cost for the electronic version of VA Form 22-1995 of \$30,000.

15. There is no change in the annual reporting burden.

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

17. The collection instrument, VA Form 22-1995, may be reproduced and/or stocked. This VA form does not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of this form. As these forms are submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay agency 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 the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-1995.

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

B. Collection of Information Employing Statistical Methods.

This collection of information does employ statistical methods.