

SUPPORTING STATEMENT FOR VA FORM 22-5495
Dependents' Request for Change of Program or Place of Training
(OMB Control Number 2900-0099)

A. Justification.

1. Spouses, surviving spouses, and children who are eligible for Survivor's and Dependent's Educational Assistance (DEA) benefits under chapter 35, and children eligible for the Fry Scholarship under chapter 33, title 38, U.S. Code, may not make any changes may not make changes in their education program unless the new program is suitable to their abilities, aptitudes, and interests. Beneficiaries may change their education program the first time solely at their option; however, these beneficiaries may not change their education program a second (or subsequent) time unless the new program is suitable to their abilities, aptitudes, and interests. In addition to changing their education program, these claimants may also change their school (where they take training) upon application to the Department of Veterans Affairs (VA). VA Form 22-5495 serves as the procedural requirement for claimants to request a different education program or place of training.

The following administrative and legal requirements necessitate the collection:

- a. 38 United States Code 3034(a), 3323(a), 3471, 3513, 3521, and 3691
- b. 38 Code of Federal Regulations 21.4234

2. VA has used the current information collection to determine (1) if the claimant continues to qualify for education benefits when taking a different program of training and (2) to verify that a new place of training is approved for benefits. The information on the form can be obtained only from the individual claimant. VA cannot make a determination without this information.

3. Information is collected when an eligible dependent of a veteran applies for a new program of education or place of training. Information technology is being used to reduce this burden.

We have converted this form into an electronic fillable format available on the Internet. Additionally, this form is available on the VONAPP (Veterans On-Line application) system. The VONAPP version is identical to the printed form, except claimants are guided past questions that do not pertain to them. VONAPP applies information technology and reduces the burden on the public. VA estimates that 30% of claimants submit the form via VONAPP.

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

5. The information collection only affects eligible dependents of veterans. There is no impact on education institutions or small businesses.

6. This information is collected only when a dependent of a veteran requests a change of educational program or place of training. If this information is not collected, VA would not have any basis to make eligibility determinations regarding requests for benefits involving a change of program or place of training. There are no technical or legal obstacles to reducing the burden of this information collection.

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 contained on page 39619 of the Federal Register dated July 9, 2010. No comments were received in response to this notice.

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

10. VA Form 22-5495 is retained permanently in the claimant's electronic folder. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation and Employment Records – VA (58VA21/22/28), that are contained in the Privacy Act Issuances, 2007 Compilation.

11. None of the information collected is considered to be of a sensitive nature.

12. The estimated annual burden for the collection of this information is 13,034 hours.

Based on information from previous fiscal years, we have determined that approximately 20% of 260,674 dependent trainees will complete VA Form 22-5495. The estimated annual number of respondents is 52,135. The annual cost to the public is \$195,510 based on 52,135 responses.

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

14. The estimated annual cost to the Federal government is \$337,949. VA calculated this amount as follows:

a. The total processing cost is of \$335,749. VA calculated this amount based on a GS-9, step 5 processor, with an hourly wage of \$25.77, reviewing each form. The review for each form takes approximately 15 minutes. Reviewing 52,135 will cost approximately \$335,749.

b. The administrative cost is \$2,200. This is the total for form development, redesign, and printing 52,135 forms.

15. The change in burden is due to the increase in the number of respondents.

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

17. The collection instrument, VA Form 22-5495, may be reproduced and/or stocked by the respondents and veterans' services organizations. VA does not display an expiration date on this form. The form is submitted to OMB every three years for approval. Revising and reprinting the form to show an expiration date would result in a costly waste of existing stock and would delay Department action on the benefit being sought. By requesting an exemption from displaying the expiration date, VA can minimize the cost to itself of collecting, processing, and using the form. VA seeks a continued exemption from displaying the expiration date on VA Form 22-5495.

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

B. Collection of Information Employing Statistical Methods.

This collection of information by the Veterans Benefits Administration does not employ statistical methods.