

SUPPORTING STATEMENT FOR VA FORM LETTER 22-315
Transfer of Scholastic Credit
(2900-0118)

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits to veterans, persons on active duty, reservists, and other eligible persons pursuing approved programs of education under chapters 30, 32, 33, and 35 of title 38, United States Code; chapters 1606 and 1607 of title 10, U.S.C.; sections 901 and 903 of Public Law 96-342; the National Call to Service Provision of Public Law 107-314; and the "Transfer of Entitlement" Provisions of Public Laws 107-107 and 110-252. This information collection is necessary when a student is receiving VA education benefits while enrolled at two training institutions at the same time. The institution at which the student pursues his approved program of education must verify that courses pursued at a second or supplemental institution will be accepted as full credit toward the student's course objective. Educational payment for courses pursued at the second institution are not payable unless evidence is received to verify that the student is pursuing his or her approved program while enrolled in these courses. VA Form 22-315 serves as this certification of acceptance of credit.

VA Form Letter 22-315 is sent to the student when information is not already established or included in the student file. The letter directs the student to have the certifying official of the primary institution complete the information on the reverse side of the form. The certifying official at the primary institution uses the letter to list the course(s) pursued at the secondary institution for which the primary institution will give full credit. Copies of the letter are sent to both the primary and secondary institutions. The certifying official at the primary institution sends the completed letter to the VA Regional Processing Office. The certifying official may also send the information electronically using the VA Online Certification of Enrollment (VA-ONCE). A determination on whether education can be authorized for these courses is based on this information. Without this information, benefits cannot be authorized for any courses pursued at any institution other than the primary institution.

The following statutes and regulations require this information collection:

a. 38 U.S.C. 3002(3), 3014, 3202(2), 3231(a)(3), 3301(3), 3501(a)(5), 3531(a); 10 U.S.C. 510, 16136(b), 16161, and 16166(b).

b. 38 Code of Federal Regulations 21.4233, 21.5070, 21.5131, 21.7070, 21.7630, 21.9620.

2. VA uses the information collected to ensure that students are pursuing their approved program while enrolled at the supplemental school. Without this information, VA might underpay or overpay benefits.

3. Information technology is being used to reduce the burden. VA estimates that the majority of the completed form letters received are submitted electronically is delivered using VA-ONCE.

4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or agency which maintains the necessary information, nor is it available from other sources within our Department.

5. Educational institutions providing training are the only sources for this information. The change in this information collection will not have a significant impact on a substantial number of small entities and the existing burden cannot be reduced for these entities. The information must be provided in a uniform, consistent fashion regardless of the size of the educational institution for those students who have changes in their enrollments.

6. If this information is not collected, eligible persons may be underpaid or overpaid. If the information is collected less frequently, it would impair VA's ability to prevent overpayments and under-payments of educational benefits.

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

8. The Department notice was published in the Federal Register on March 26, 2013, Volume 78, Number 58, page 18424. No comments were received in response to this notice.

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

10. VA Form 22-315 is retained permanently in the claimant's education folder. Our assurance of confidentiality is covered by 38 U.S.C. 5701 and 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, 2011 Compilation.

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

12. The estimated annual burden for the collection of the information is 1,569 hours. VA estimates an average of 9,415 responses. It is further estimated that a respondent will only submit one of these forms per year and it will take 10 minutes to complete this form.

Based on an estimated receipt of 9,415 responses as indicated above, the annual burden is 1,569 hours.

The annual cost to the public is estimated to be \$23,535 based on 1,569 hours based on the respondents' cost of \$15 an hour.

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

14. The annual cost to the government for administering this form is estimated at \$80,875. VA estimates it will take a GS 9/5 Claims Examiner (paid \$25.77 per hour) 10 minutes to process each of the 1,569 responses equaling \$80,875 in administration costs.

15. The change in the annual burden is due to the increase in the number of individuals pursuing training.

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

17. The collection instrument, VA Form 22-315 may be reproduced and/or stocked by respondents and veterans organizations. Requiring VA to display an expiration date on the form would result in unnecessary waste of existing stocks. Inclusion of the expiration date could also result in a delay of the Department's action on the benefit being sought (respondent trying to obtain a newer version, while VA would have accepted the older version). For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date.

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 not employ statistical methods.