

Supporting Statement
For Renewal Submission of Certification of Affirmation of Enrollment
Agreement Correspondence Course
(2900-0576)

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay educational benefits for correspondence training under chapters 30, 32, 33, 35, of title 38, U.S. Code, chapters 1606 and 1607 of title 10, U.S. Code and section 903 of Public Law 96-342. The statute provides that before VA can pay education benefits, the claimant must affirm in writing the enrollment agreement for the correspondence course after the expiration of 5 full days after the date that he or she signed the correspondence contract. Accordingly, VA Form 22-1999c, Certificate of Affirmation of Enrollment Agreement of Correspondence Course was developed to assist with this statutory requirement. The claimant either affirms the agreement or destroys this form. The claimant then notifies the correspondence school of this decision. If the agreement is affirmed, the claimant enters a date no later than the seventh day after the date the agreement was signed, signs the form, and then the claimant sends the completed form to the correspondence school. The correspondence school's Certifying Official attaches an enrollment certification to VA Form 22-1999c and sends both forms to VA for processing.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3686(b)
- b. 38 U.S.C. 3323(a)
- c. 10 U.S.C. 16136(b)
- d. 10 U.S.C. 16166 (b)
- e. 38 C.F.R. 21.4256 (b)

2. VA uses information from the current collection to pay education benefits for correspondence training. This information allows VA to determine if the claimant has been informed of the 5 day reflection period required by law.

3. This collection has been converted to an electronic fillable format which is available on the internet. Due to cost restrictions, it is prohibitive to have this form made capable to be submitted electronically.

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. There is no impact on education institutions or small business since this information collection only affects individual claimants eligible for education benefits based on correspondence training.

6. Collecting this information is done when a claimant requests education benefits based on approved correspondence training.

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

8. The Department notice was published in the Federal Register on January 17, 2014, Volume 79, Number 12, page 3270. No comments were received in response to this notice.

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

10. VA Form 22-1999c 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 questions on this form are considered to be of a sensitive nature.

12. The estimated total annual burden to the public is 18 hours. This estimate is determined as follows:

- a. Number of Respondents: 360
- b. Frequency of response: 1.00
- c. Annual Burden Hours: 18 hours (360 x 3/60)
- d. Estimated Completion Time: 3 minutes
- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$432. (18 burden hours x \$24 per hour)

The average number of claimants who entered correspondence courses from FY 2011 and FY 2012 was 360. It is estimated that the same number of claimants will enter correspondence courses annually from FY 2013 through FY 2015. The amount of time for each submission remains 3 minutes.

13. This submission does not involve any recordkeeping costs.

14.

a. The annual cost to the Federal Government for administering this information collection activity is \$464.

b. The cost is based on a GS 9/5 (\$25.77/hour) veterans' claims examiner taking approximately 3 minutes to process each of the 360 responses; $(360 \times 3/60 \times \$25.77)$.

15. The change in the annual reporting burden hours is due to the overall decrease in the number of claimants entering correspondence courses. The expiration date placeholder has been added to the form.

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

17. We are not seeking approval to omit the expiration date for OMB approval.

18. This information collection complies with the requirements under 5 C.F.R. 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

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