

SUPPORTING STATEMENT FOR VA FORMS 22-8691,  
22-8692, 22-8692a, and 22-8692b [Work-Study]  
(OMB 2900-0209)

**A. Justification.**

1. The Department of Veterans Affairs (VA) is authorized to pay work-study benefits to Veterans and other eligible individuals who are receiving educational assistance under chapters 30, 31, 32, 33, and 35 of title 38, U.S.C.; chapters 1606 and 1607 of title 10, U.S.C.; section 903 of Public Law 96-342; and the National Call to Service Provision of Public Law 107-314.

In order to receive work-study benefits, eligible individuals must complete VA Form 22-8691, Application for Work-Study Allowance. The eligible individual then enters into an agreement with VA in which he or she agrees to work a specified number of hours. If the individual wants a payment of work-study allowance in advance of working those hours, VA Form 22-8692, Student Work-Study Agreement (Advance Payment), is used. If the individual does not want an advance payment of the work-study allowance, VA Form 22-8682b, Student Work-Study Agreement, is used. If the individual wants to extend the work-study contract, VA Form 22-8692a, Extended Student Work-Study Agreement, is used.

Section 3485 of title 38, United States Code, and section 21.4145 of title 38, Code of Federal Regulations necessitate these collections of information.

2. VA uses the information collected to determine the individual's eligibility for the work-study allowance, the number of hours the individual will work, the amount payable, whether the individual desires an advance payment, and whether the individual wants to extend the work-study contract.
3. Information technology is helping to reduce the burden. The electronic connection is made via an internet-based application called Veterans Online Application (VONAPP) that collects the same information as the printed on VA Form 22-1995. VONAPP allows applicants to submit information directly to the Regional Processing Office (RPO) with jurisdiction over the claim, reducing potential error and speeding the application process.

Work-Study applicants complete these forms and return them to the VA Regional Processing Office of jurisdiction for processing. The work-study application is available in an electronically fillable format on VA's website. Except for the application form, these forms go back and forth between VA and the claimant before the contract is finalized. This method of collecting the information is the most efficient and causes the least burden on the public. Further automation of these submissions is not practical due to the low frequency of the information collection and the complexity of developing a system for the full electronic submission of this information collection.

4. A review was 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. The information collection only affects individual claimants. There is no impact on educational institutions or small businesses.
6. If this information were not collected or collected less often, VA could not pay work-study benefits. There are no technical or legal obstacles to prohibit reduction of the collection burden.
7. The collection of information does not require any special circumstances.
8. The Department notice was published in the Federal Register on October 20, 2014, Volume 79, No. 202, page 62712. No comments were received in response to this notice.
9. VA does not provide any payment or gift to respondents.
10. These forms are retained permanently in the claimant's work-study folder. Privacy to the extent permitted by law is covered by VA System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records — VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2011.
11. None of the information collected is considered to be of a sensitive nature.
12. See Below:
  - a. Number of Respondents: 38,635
  - b. Frequency of Response: 1
  - c. Annual Burden Hours: 6,457
  - d. Estimated Completion Time: 23 minutes  

(15 minutes for VA Form 22-8691; 5 minutes for VA Forms 22-8692 and VA Form 22-8692b; and 3 minutes for VA Form 22-8692a).
  - 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 \$154,968 (6,457 burden hours x \$24 per hour).

The annual burden estimate for these collections of information is 6,457 hours; the estimated number of annual responses for Fiscal Years (FY) 2014 through 2016 is

based on an annual average of the number of applications, contracts, and extensions processed during FY 2011, 2012, and 2013.

We calculated the average of the total number of responses received in each category (applications, contracts, and extensions) for FY 2011, 2012, and 2013 as shown below:

	APPLICATIONS (VA 22-8691)		CONTRACTS APPROVED (VA 22-8692 & 22-8692b)	CONTRACTS EXTENDED (VA 22-8692a)
	APPROVED	DENIED		
FY 11	13,844	3348	13,626	2628
FY 12	17,105	3282	17,093	1572
FY 13	16,986	5533	15,929	4963
TOTAL	47,935	12,163	46,648	9,163
AVERAGE	15,978	4,054	15,549	3,054

We will use these respective averages (20,032 applications; 15,549 contracts; 3,054 extensions) to forecast what would be completed annually for FY 2014 through 2016. Using these figures (20,032 applications; 15,549 contracts; and 3,054 extensions), we project the estimated annual hour burden for claimants in FY 2014, 2015, and 2016 will also be as follows:

FORM	TIME (Minutes)	# of Forms	HOURS
VA Form 22-8691 (approved & denied)	15	20,032	5,008 (20,032X15/60)
VA Form 22-8692 & 22-8692b	5	15,549	1,296 (15,549X5/60)
VA Form 22-8692a	3	3,054	153 (3,054X3/60)
	TOTAL	38,635 Forms	6,457 Hours

Based on a cost of \$24.00 per hour (includes mailing costs) for 6,457 hours plus the mailing costs, the cost to the public is estimated to be \$154,968 annually.

13. This submission does not involve any recordkeeping costs.
14. The estimated total cost to the Federal Government for processing these information collections is \$136,368 (117,287+150+18,931). VA calculated this amount as follows:

The VA Regional Processing Office has a GS 6 (step 5) process these information collections. Based on the current hourly pay for this employee of \$18.96 per hour for 6,186 hours, the cost for processing these forms is \$117,287.

FORM	TIME (Minutes)	# of Forms	HOURS
VA Form 22-8691	10	20,032	3,339
VA Form 22-8692 & 22-8692b	10	15,549	2,592
VA Form 22-8692a	5	3,054	255
	TOTAL	38,635 Forms	6,186 Hours

VA Forms 22-8692, 22-8692a, 22-8692b will no longer be sent for printing. VA completes these agreement forms using the automated Work-Study Management System. Copies of the completed forms are only printed from the Work-Study Management System as needed.

VA Form 22-8691 is available in an electronically fillable format at VA's website. The majority of applicants obtain this form on-line. VA's annual cost for printing the 5,000 application forms (approximately 25 percent of the total number used) needed for distribution is \$150 (\$30 per 1,000 forms).

Mailing costs are estimated to be \$18,931 per year. VA mails 5000 copies of VA Form 22-8691 to schools and potential work-study sites. VA mails approximately 18,603 contracts or extensions (15,549 + 3,054) of VA Form 22-8692, 22-8692a, or 8692b) to individual applicants for their signature. After VA finalizes and signs the contract, a copy of the final contract or extension (approximately 18,603) is mailed to the applicant. The maximum number of mailings would be 38,635 at \$0.49 per form (\$0.46 for postage and \$0.03 per envelope) for a total of \$18,931.

15. The increase in the public burden hours to the current estimate of 6,457 hours (for 38,635 responses) reflects the increase in the annual projected number of applications, contracts, and extensions for FY 2014 through 2016 based on the actual number of these forms submitted for FY 2011, 2012 and 2013. The expiration date placeholders have been added to the forms.
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 submission does not contain any exceptions to the certification statement.

**B. Collection of Information Employing Statistical Methods.**

This collection of information does not employ statistical methods.