

**SUPPORTING STATEMENT FOR
EVIDENCE FOR TRANSFER OF ENTITLEMENT OF EDUCATION BENEFITS
(2900-0708)**

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

The Department of Veterans Affairs (VA) is authorized to pay educational assistance to dependents of individuals who transferred benefits under the Montgomery GI Bill- Active Duty and the Post-9/11 GI Bill. Title 38 U.S.C. 3020 and 3319 provide that each military service has the option to permit individuals to transfer their educational assistance to one or more of their dependents. VA has implemented the provisions of 38 U.S.C. 3020 and 3319 in 38 CFR 21.7080 and 21.9570, respectively.

Individuals approved to transfer their educational assistance to their dependents must provide the name of each dependent, the number of months of entitlement transferred to each dependent, and the period (beginning date or ending date) for which the transfer will be effective for each designated dependent. The individuals may modify or terminate a previous designation by submitting a request for change or revocation to VA.

The Department of Defense (DoD) solely determines whether or not an individual is eligible to transfer educational assistance to dependents. The Department of Defense uses DD Form 2366-1 to record this information for individuals requesting to transfer benefits under MGIB. The Department of Defense uses a website (<https://www.dmdc.osd.mil/TEB/>) to record requests for transfer of educational assistance under the Post-9/11 GI Bill.

VA accepts the information provided by DoD as evidence to show that the individual was approved by the military to transfer entitlement, to whom he or she wants to transfer entitlement, how many months he or she wants to transfer, and the dates between which the transfer is effective. However, if an individual subsequently wants to amend or revoke a previous designation, VA will accept modifications submitted electronically through DoD's website and statements in writing that show the pertinent information.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

VA uses the information shown on DoD Form 2366-1 or submitted electronically from DoD's website to determine whether the dependent qualifies to receive education benefits under the transfer of entitlement provisions of law. Without this information, VA would not be able to determine the dependent's eligibility for the transfer of entitlement program.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Information technology is currently being used to reduce the burden for individuals requesting to transfer educational benefits under the Post-9/11 GI Bill program. Information technology is not currently being used to collect information regarding transferring educational assistance under MGIB at this time as the number of applicants and approved participants is not significant. Collecting transfer of entitlement information using DD Form 2366-1 is the most efficient method and causes the least burden on the public.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection only involves individuals requesting to transfer benefits to their dependents. There is no impact on educational institutions or small businesses.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

If this information is not collected, eligible dependents may be not paid if entitled or may be paid if not entitled. To collect the information less frequently would prevent VA from making the payments specified by law.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

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

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notices was published in the Federal Register on Wednesday, April 12, 2017, Volume 82, Number 69, pages 17742. No comments were received in response to this notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

VA does not provide any payment or gifts to respondents.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Our assurance of privacy 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. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent

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

12. Estimate of the hour burden of the collection of information:

Estimate of Information Collection Burden.

- a. Number of Respondents: 135,735
- b. Frequency of Response: Once
- c. Annual Burden Hours: 11,311
- d. Estimated Completion Time: 5 minutes

The respondent population consists of veterans who are pursuing approved programs of education. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as educational background and wage potential of respondents. Therefore, VBA used general wage data for "All Occupations" to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics gathers information on full-time wage and salary workers. Accordingly, the median weekly earnings of full-time wage and salary workers is \$929.20. Assuming a forty (40) hour work week, the median hourly wage is \$23.86.

The general wage code of "00-000-0000 for "All Occupations" may be found by clicking this link: https://www.bls.gov/oes/current/oes_nat.htm, as of May, 2016.

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$262,754 (11,311 burden hours X \$23.86 per hour).

The total estimated cost to the public is \$269,880 (11,311 hours multiplied by \$23.86 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

This submission does not involve any record keeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
9	5	45	\$27.02	\$20.27	135,735	\$ 2,750,670
Overhead at 100% Salary						\$ 2,750,670
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						
Processing / Analyzing Costs						\$ 2,750,670
Printing and Production Cost						\$ 0
Total Cost to Government						\$ 2,750,670

Note:
the

hourly wage information above is based on the hourly 2017 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/RUS_h.aspx). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of the grade level spend to process to completion a claim received on this form.

15. Explain the reason for any burden hour changes since the last submission.

There is a decrease in the burden hours for this submission due to the reduction in the number of claims for transferred benefits.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

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