

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

**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 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.; and chapter 1606 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 22-8692b, 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. 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 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. 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 helping to reduce the burden. The work-study forms are available on va.gov in an electronically fillable format. Efforts are being made to have the forms also available to be completed and submitted via Salesforce. Currently, the work study applicants must print and mail or submit via email, and as a PDF document, all of these work study forms.

**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.**

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

The information collection only affects individual claimants. 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 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. 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 information does not require any special circumstances.

**8. If applicable, provide a copy and identify the date and page number of publications 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 notice was published in the Federal Register on November 20, 2020, Volume 85 Number 225, page 74489. One comment was received.

**From:** Justin Hauschild <[justin.hauschild@studentveterans.org](mailto:justin.hauschild@studentveterans.org)>

**Sent:** Monday, November 23, 2020 12:06 PM

**To:** Green, Danny S. <[Danny.Green2@va.gov](mailto:Danny.Green2@va.gov)>

**Subject:** [EXTERNAL] Revision Details: OMB Control No. 2900-0074 and OMB Control No. 2900-0209

Mr. Green,

I am contacting you to request additional details about two recent VA notices for revisions of currently approved collections of information.

The relevant OMB Control Numbers are: OMB Control No. 2900-0074 (Requests for Change of Program or Place of Training) and OMB Control No. 2900-0209 (Applications for Work-Study Allowance; Student Work-Study Allowance (Advance Payment); Student Work-Study Agreement; and Extended Student Work-Study Agreement).

Each Notice indicates the type of review is a revision.

Could you please specify what the revisions are or point me to where they are available publicly so that I may review them?

Best regards,

**Justin Hauschild**

Legal Fellow

Student Veterans of America

202-223-4710 ext. 542

1012 14th St NW, 12th Floor, Washington, D.C. 20005

The views expressed in this communication are not the legal opinion(s) of the author and are not intended as professional legal advice or counsel. If you need legal advice, you should contact a licensed attorney in the appropriate jurisdiction.

## **VA Response:**

Good Afternoon Mr. Hauschild,

Department of Veterans Affairs received your request regarding OMB Control Numbers 2900-0074 and 2900-0209.

1. Specifically, OMB Control No. 2900-0074 provides an update to the Request for Change of School or Program, VA Form 22-1995. Prior to the creation of VA Form 22-10203, a beneficiary had to apply for the Edith Rogers Nourse STEM Scholarship via the VA Form 22-1995. With the inception of the new VA Form 22-10203, the VA Form 22-1995 must be updated to reflect the change.

In addition to removing the STEM Scholarship choice from this form, VA also made the following additional revisions:

- a. Moved the Request to Opt-Out of Information Sharing with Educational Institutions from the top of the form to the instructions.
  - b. Moderately changed the direct deposit enrollment language for clarity, AND
  - c. Changed the request for the applicant's telephone numbers from Primary and Secondary, to Home and Mobile.
2. Regarding the OMB Control No. 2900-0209, Application for Work-Study Allowance, (VA Form 22-8691), Student Work-Study Allowance (Advance Payment) (VA Form 22-8692a), Student Work-Study Agreement (VA Form 22-8692), and the Extended Student Work Study Agreement (VA Form 22-8692b), these revisions are as a result of renewing the forms associated with the VA Work Study Program and the Information Collection.

While renewing the Information Collection, it was determined some updates were required on the VA Forms:

- a. For the VA Form 22-8691, it was revised to include the Edith Rogers Nourse Stem Scholarship as an education program.
- b. To remove the option for the applicant to apply under the Reserve Educational Assistance Program (REAP or chapter 1607).
- b. Changed the request for the applicant's telephone numbers from Primary and Secondary, to Home and Mobile.
- c. For the VA Form 22-8692, no change.
- d. For the VA Forms 22-8692a and 8692b, no change.

Since the revised forms are currently still within the 60-day Federal Register Notice comment period, these updated versions will not be available on our website(s) until after OMB provides their final approval. However, per your request, I am attaching copies of the VA Forms 22-1995 and 22-8691, which show the affected changes.

Thanks,

Education Service

**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 gift 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.**

These forms are retained permanently in the claimant's electronic education claims folder. Privacy, to the extent permitted by law, is covered by VA System of Records, Compensation, Pension, Education, and Veteran Readiness and Employment Records — VA (58VA21/22/28), which is contained in the Privacy Act Issuances, 2012.

**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.**

There are no questions of a sensitive nature.

**12. Estimate of the hour burden of the collection of information. Please show mathematical calculations:**

**See Below:**

- a. Number of Respondents: 89,817.
- b. Frequency of Response: Annually.
- c. Annual Burden Hours: 16,031. (for calculation, please see chart below)
- d. Estimated Completion Time: 20 min.
  
- e. The respondent population consists of claimants who are pursuing approved programs of education. VA 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 to estimate the respondents’ costs associated with completing the information collection.

<b>FORM</b>	<b>TIME (MIN)</b>	<b># of FORMS</b>	<b>BURDEN HOURS</b>
VA Form 22-8691 (approved & denied)	15	51,287	12,821
VA Form 22-8692 & 22-8692b	5	38,530	3,210
<b>20 min Total</b>		<b>89,817</b>	<b>16,031</b>

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$25.72 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm). The wage rate is effective as of May 2020.

Legally, respondents may not pay a person or business for assistance 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 \$412,317; (16,031 burden hours x \$25.72 per hour).

**13. Provide an estimate of the total annual cost burden to respondents or recordkeeping 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
7	5	15		\$23.49	\$ 5.87	51,287	\$ 301,182.90
Overhead at 100% Salary							
7	5	5		\$23.49	\$ 1.95	38,530	\$ 75,422.47
Overhead at 100% Salary							
Overhead at 100% Salary							\$376,605.37
Processing / Analyzing Costs							\$376,605.37
Printing and Production Cost							\$ 0

Total Cost to Government	\$376,605.37
--------------------------	--------------

Overhead costs are 100% of salary and are the same as the wage listed above.

**Note:** The hourly wage information above is based on the hourly 2020 General Schedule (Base) Pay [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/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 these forms.

**REPORTING FEE INFORMATION:** There is no cost to schools because VA pays each school that furnishes training under the various VA education programs a fee for processing all required VA reports or certifications for each Veterans or other eligible claimants. VA refers to these fees as "school reporting fees" which help schools to defray the costs of processing paperwork required to be submitted to VA. The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967 and are in 38 U. S. C. 3684.

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

There was a slight decrease in burden for this submission, which reflects a decrease in the number of individuals using education 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.**

The information collection is not for publication or tabulation use.

**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 does not employ statistical methods.