

**SUPPORTING STATEMENT FOR
MONTHLY CERTIFICATION OF FLIGHT TRAINING**
(OMB Control Number 2900-0162)

A. Justification

1. Veterans and individuals on active duty who are training under 38 U.S.C. chapters 30 and 32 (including section 903 of Public Law 96-342) and reservists training under 10 U.S.C. chapters 1606 and 1607 may receive benefits for enrolling in and pursuing approved vocational flight training. Payments are based on the number of hours of flight training completed during each month. Benefits are not payable if the veteran, individual on active duty or reservist terminates training. VA Form 22-6553c serves as the report of flight training pursued and the termination of training.

The following administrative and legal requirements necessitate the collection:

- a. 38 U.S.C. 3032(e), 3231(e), and 3680(g).
- b. 10 U.S.C. 16131(f) 10 U.S.C. 16136, and 10 U.S.C. 16166.
- c. 38 CFR 21.4203(g), 21.7640(a)(5).

2. VA uses the information from the current collection to ensure that the amount of benefits payable to the student who is pursuing flight training is correct. Without this information, VA would not have a basis upon which to make payment.

3. Information technology currently is being used to collect this information and, in the future, will further reduce the burden on the public.

Flight schools currently have two means of submitting this information:

- (a) Using the paper form or
- (b) Using VA-ONCE (VA Online Certification of Enrollment) to electronically submit the information.

For this submission, we estimate that of the VA Forms 22-6553c received approximately 10% are electronic submissions.

4. VA is not aware of any duplication of this information collection.

5. The information collections cannot be reduced for small schools. The information must be submitted for any student receiving VA educational benefits for the pursuit of flight training. The information provided must be uniform and consistent regardless of the size of the school.

6. Payment of educational assistance benefits for flight training cannot be made without the information (either a completed paper form or the electronic

information). Since benefits are payable monthly, the collection of information must be on a monthly basis, provided the student has flown during the month.

7. The collection of the information does not require any special circumstance.

8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 17832-17833 of the Federal Register dated April 7, 2010. There were no comments received in response to this notice.

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

10. After processing the VA Form 22-6553c, the form is scanned into the claimant's record at the regional processing offices. 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 is contained in the Privacy Act Issuances, 2007 Compilation.

11. None of the questions on this form are considered to be of a sensitive nature.

12. The estimated annual burden for the collection of this information is 4,017 hours. This figure is based on 1,339 respondents who are estimated to complete an average of six responses per year for a total of 8,034 annual responses. The estimated burden per response continues to be .5 hours, which is divided equally between the burden on flight schools (1/4) and the burden on students (1/4). VA has received no comments that would indicate this burden estimate is incorrect.

The annual cost to the public is \$ 60,255 (4,017 hours x \$15.00)

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

14. The total annual cost to the government for administering this form is estimated at \$69,598 based on 8,034 responses annually. This cost is determined as follows:

Processing time of the 8,034 responses is 1/3 of an hour (i.e., processing time of 20 minutes) per response by the Regional Processing Office. Using the salary of a GS 9/5 Veterans Claims Examiner at \$25.77 per hour average across the country would have a processing cost of \$69,012. (The \$25.77 hourly rate is extracted from the January 2010 OPM rates.)

Printing cost for the form is \$50 per 1,000 forms. To print 8,034 forms, the cost is \$402.

Mailing costs are estimated to be \$184 yearly. VA has the printing contractor place 50 forms in a standard pack. VA mails an average of 2 of these packets (approximate weight one pound) to flight schools. The cost of each mailing is approximately \$2.04.

15. The increase of 303 hours is attributed to an adjustment in the estimation in the number of eligible trainees in all programs who are participating in flight training since the last OMB submission for this information collection.

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

17. The collection instrument, VA Form 22-6553c, may be reproduced and/or stocked by the respondents and veteran service organizations. This VA form does not display an expiration date and if required to do so, it would result in unnecessary waste of existing stocks of this form. As this form is submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize the cost to itself of collecting, processing, and using the information, by not displaying the expiration date. For these reasons, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 22-6553c.

18. This information collection complies with all requirements under 5 CFR 1320.8(b)(3).

B. Collection of Information Employment Statistical Methods

This collection of information does not employ statistical methods.