

**SUPPORTING STATEMENT FOR VA Form 22-6553d and 22-6553d-1
Monthly Certification of On-The-Job and Apprenticeship Training
(2900-0178)**

In this OMB 83-1 and supporting statements, a reference to VA Form 22-6553d also includes VA Form 22-6553d-1 unless otherwise specified. VA Form 22-6553d-1 contains the same information as VA Form 22-6553d.

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay education benefits to Veterans and other eligible persons pursuing approved programs of on-the-job training or apprenticeship training under chapters 30, 32, 33 and 35, of title 38, U. S. C.; chapters 1606 and 1607 of title 10, U. S. C.; and Section 903 of Public Law 96-342.

The following administrative and legal requirements necessitate the collection:

A. 38 U. S. C. 3002(3)(C), 3032(c), 3233, 3313(g), 3484, 3534(a), 3680(c), 3687, and 10 U. S. C. 16131.

B. 38 CFR 21.3131(a), 21.3132(c), 21.4135(e)(3)(iii), 21.4203(f)(3), 21.4262, 21.5130, 21.5138, 21.7139(g), and 21.7639(f), 21.9561(c), 21.9641 (g).

2. VA provides the collection instrument to training establishments to assist them in promptly reporting the recent training status of individuals as required by law. The information collected informs VA whether a claimant's education benefits are to be continued without change, amended, or terminated, and the effective date of such continuance, amendment, or termination.

Benefits are authorized monthly based on the number of hours worked by the trainee and verified by the training establishment. Unscheduled terminations result in the termination of benefits. If hours are reduced to less than a full-time work schedule a reduction of benefits will occur.

VA Form 22-6553d is computer-generated while 22-6553d-1 is printed and used by regional processing offices when the computer-generated version is not available. These forms are completed and signed by the trainee and the training establishment to report the number of hours worked and/or to report the date of termination. These forms are then sent to the regional processing office for payment.

3. Information technology is not being used to reduce the information collection burden because VA is not currently able to accept electronic signatures and cannot require all schools to use information technology to submit this information.
4. VA is not aware of any duplication of this information collection.
5. The information must be uniform and consistent and is required by statute, regardless of the size of the training establishment. The form must be submitted for any students receiving VA educational benefits when training in “on-the-job training” establishments or apprenticeships. For that reason, the information collection cannot be reduced for small establishments.
6. Collecting this information at the end of each month of training allows VA to pay all benefits due to trainees, but prevents the overpayment of benefits.
7. The collection of this information does not require any special circumstances.
8. A notice regarding this information collection was published on 67559-67560 of the Federal Register dated November 1, 2011. No comments were received in response to this notice.
9. VA does not provide any payments or gifts to respondents.
10. If VA Form 22-6553d (or 22-6553d-1) reports continued training, the form is retained in the Finance Activity in the regional processing office. If the form reports termination of training, the form is retained in the claimant's education folder. VA assurance of confidentiality is covered by system of records, Compensation, Pension, Education and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) contained in the Privacy Act Issuances, 2011 Compilation.
11. None of the information collected is considered to be of a sensitive nature.
12. The estimated annual burden for the collection of the information is 40,775 hours. This estimate is determined as follows:

Average Number of Respondents from FY 2009 to FY 2011:	20,387
Average Number of Responses Annually:	9
Number of Responses Annually:	183,483
Time per response:	10 minutes
Annual Respondent Hour Burden:	30,581 hours

The number of respondents/responses was determined by averaging the actual statistical data from FY 2009 through FY 2011. Each respondent is expected to complete 9 forms each; totaling 183,483 responses annually. It is expected that

each of these forms will take approximately 10 minutes to complete and will total 30,581 public burden hours.

The estimated annual burden for this collection is \$535,150. The estimate was determined as follows:

Both the student and training establishment will provide information to complete the response. It is estimated that each will spend 5 minutes on each response (183,483 responses) or 15,290 burden hours each. The dollar burden for each hour of time for the student response is \$15 or a total annual burden of \$229,350. In addition, the dollar burden for each hour of time for the training establishment response is \$20 or a total annual burden of \$305,800. The total annual dollar burden to the public for this collection is \$535,150.

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

14. The annual cost to the government for administering this form is estimated at \$402,776, based upon 183,483 responses annually. The estimate was determined as follows:

a. The annual estimated processing cost of forms which do not involve a termination of training (approximately 70% or 128,438 responses) is \$162,688. This is based on the annual salary of a clerk in the Finance Division at the regional office, GS 4, step 5 (\$15.20 per hour), and a processing time of 5 minutes per response.

b. The annual estimated processing cost of forms which do involve a termination of training (approximately 30% or 55,045 responses) totals \$236,418. This is based on the annual salary of a veterans claims examiner GS 9, step 5 (\$25.77 per hour), and a processing time of 10 minutes per response.

c. Costs to print these forms is estimated to be \$3,670 per year (183,483 x \$.02)

15. The decrease burden is the result of fewer individuals applying under the program.

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

17. The collection instrument, VA Forms 22-6553d and 22-6553d-1, may be reproduced and/or stocked by the training establishments and veterans' service organizations. These VA forms do not display an expiration date and if required to do so, would result in unnecessary waste of existing stocks of these forms. As these forms are 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 Forms 22-6553d and 22-6553d-1.

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

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.