

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

A. Justification

1. The Department of Veterans Affairs (VA) is authorized to pay benefits to Veterans and other eligible persons enrolling in and pursuing approved vocational flight training 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 NCS (National Call to Service) (10 U.S.C., chapter 31, section 510).

Payments are based on the number of hours of flight training completed each month. Benefits are not payable if the eligible person 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), 3313(g)(3)(C), 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.

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 12% are electronic submissions.

4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or agency that maintains the necessary information, nor is it available from other sources within our Department.

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 Department notice was published in the Federal Register on February 26, 2013, Volume 78, Number 38. No comments were 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 are contained in the Privacy Act Issuances, 2011 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 7,306 hours. This figure is based on 2,435 respondents who are estimated to complete an average of six responses per year for 14,610 annual responses. The estimated burden per response continues to be 30 minutes, which is divided equally between the burden on flight schools (15 minutes) and the burden on students (15 minutes). VA has received no comments that would indicate this burden estimate is incorrect.

The annual cost to the public is \$109,590 (7,306 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 \$125,500 based on 14,610 responses annually. This cost is determined as follows:

Processing time of the 14,610 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 \$125,500.

15. The requested burden estimate of 7,306 hours represents an increase of 3,289 hours from the current burden estimate of 4,017 hours in the OMB inventory. The increase of 3,289 hours is due to the increase in the number of individuals participating in flight training following the implementation of the Post-9/11 GI Bill.

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.