

SUPPORTING STATEMENT FOR
RECORD KEEPING AT FLIGHT SCHOOLS
(2900-0613)

A. Justification.

1. Educational institutions are required by statute (38 U.S.C. 3690(c)) to maintain records and accounts of eligible veterans and other eligible persons who receive educational assistance, and the records of other students that are necessary to determine if the educational institution is complying with the provisions of law governing approval of courses for VA training. This requirement is implemented by 38 CFR 21.4263(h)(3) which sets forth records VA expects a flight school to maintain in order to retain approval for its courses.
2. The State approving agencies that approve courses for VA training use these records to determine if courses offered by flight schools should be approved. VA representatives use the records to determine the accuracy of payments made to VA students at flight schools.
3. The regulation does not require any reports. It only requires record keeping. Flight schools have the option to store these records electronically.
4. 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. The average number of students enrolled in each flight school to which the information collection may apply will be less than ten. Consequently, the cost of record storage to each flight school for complying with the information collection will be low. Hence, the information collection does not have any impact on a substantive number of small entities.
6. If flight schools do not keep these records, State approving agencies may not know whether to approve a course. VA will not be able to verify the accuracy of VA educational payments made to students training at flight schools.
7. The collection of this information does not require any special circumstances.
8. The Department notices were published in the Federal Register on September 27, 2013, Volume 78, Number 188, page 59771. No comments were received in response to this notice.
9. VA does not provide any payment or gifts to respondents.

10. 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. No information from this collection is considered to be of a sensitive nature.

12. Estimate of Information Collection Burden

a. Number of Respondents: 272 (To arrive at this figure, VA reviewed the number of total flight students for Fiscal Year 2012.)

b. Frequency of Response: 1

c. Annual Burden Hours: 91

d. Estimated Completion Time: 20 Minutes (VA continues to consider that a school will need approximately 20 minutes (one third of an hour) to generate and store the records pertaining to each student that would not be kept in the ordinary course of business or in compliance with FAA regulations.)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$2,184. (91 burden hours x \$24 per hour).

13. Most of the records required by this information collection would be kept in the normal course of business. Other records would be kept if the flight school wishes to comply with FAA rules (14 CFR part 141, 14 CFR part 142 or both). The additional record keeping imposed by this information collection would take less than a square foot of space. Therefore, the record keeping burden is near zero.

14. The estimated cost to the Federal government for this information collection is \$383.13.

VA estimated that approximately one fifth (1/5) of all submissions will be checked by a VA compliance survey specialist, GS 10/5 reviewing these flight school records. Using the 272 submissions, it is estimated that compliance specialists will review 54 records. VA estimated that the compliance survey specialist will need approximately 15 minutes (1/4 hour) to check each record. VA is using an hourly salary rate of \$28.38. ($54 \times \$28.38 \times 15 \text{ minutes} / 60 = \383.13).

15. The decrease in hours is a result of a decrease in the actual number of claimants participating in flight training in FY2012.

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

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

18. 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.