

SUPPORTING STATEMENT FOR VA FORMS 22-6553b and 22-6553b-1
Certificate of Lessons Completed
(2900-0353)

Justification

1. The Department of Veterans Affairs (VA) is required to pay education benefits for correspondence training under chapters 30, 32, 33, and 35 of title 38, United States Code, chapters 1606 and 1607 of title 10, U.S.C., section 903 of Public Law 96-342, the National Call to Service Provision of Public Law 107-314, and the Omnibus Diplomatic Security and Antiterrorism Act of 1986. Benefits are payable quarterly based on the number of lessons completed by the student and serviced by the school. Benefits are not payable when training is interrupted, discontinued or previously completed. The student receives VA Form 22-6553b, Certification of Lessons Completed, completes their portion showing the number of lessons completed since the previous certification of lessons completed, and sends the form to the school. The school's Certifying Official certifies the number of lessons serviced by the school and sends the form to VA for processing. VA Form 22-6553b and VA Form 22-6553b-1 are identical forms; however, VA Form 22-6553b is computer-generated quarterly (i.e., March, June, September, and December) for chapter 35 students with their name, mailing address, and other pertinent information printed on the form at the time the form is generated. VA Form 22-6553b-1 is used for students in other VA education benefit programs and the student's name, mailing address and other pertinent information is entered on the form manually. For this submission, these two forms are considered to be one and the same. The expiration date placeholder has been added to the form.

The following administrative and legal requirements necessitate the collection:

a. 38 U.S.C. 3032(d), 3034, 3241, 3323, 3474, 3481, 3484, 3534(b), 3680(b), 3684, 3686(a), and 10 U.S.C 16131(e), 16136(b), chapter 31, section 510 and chapter 1607;

b. 38 C.F.R. 21.4203(e), 21.4206, 21.5200(d) & (g), 21.7140(c)(3), 21.7159, 21.7640(a)(4), 21.7659, and 21.9720.

2. VA uses information from the current collection to determine the number of lessons completed by the student and serviced by the correspondence school and to determine the date of completion or termination of correspondence training. VA pays education benefits based on the information furnished on the form. Without this information, VA would be unable to determine the proper payment or the student's training status.

3. VA Form 22-6553b and VA Form 22-6553b-1 is available on the One-VA Website in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.

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

5. The information collection does not have a significant impact on a substantial number of small entities. It cannot be reduced for correspondence schools with small enrollments. The information is required by statute to administer correspondence training under the different education programs. The information requested from the school official is minimal. School officials are generally required to provide the information approximately three times annually for each student.

6. If this information is not collected or were collected less often, VA would not be able to properly administer payments. The Certification of Lessons Completed is used quarterly by the student/school to apply for payment for completing correspondence lessons. There are no technical or legal obstacles to reducing the burden of this information collection.

7. The collection of this information does not require any special circumstances.

8. The Department notice was published in the Federal Register on October 2, 2014, Volume 79, No. 191 at pages 59556 and 59557. No comments were received in response to this notice.

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

10. If VA Form 22-6553b (or 22-6553b-1) reports continued training, the form is retained in the Finance Activity in the Regional Office. If VA Form 22-6553b (or 22-6553b-1) reports the termination of training, the form is retained in the claimant's electronic education records. Our assurance that information will be kept private to the extent permitted by law is covered by our System of Records, Compensation, Pension, Education, and Vocational Rehabilitation Records - VA (58VA21/22/28), 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 to the public in hours is 109. This estimate is determined as follows:

a. Annual Number of Respondents:	217
i. Average number responses annually per respondent	3
ii. Annual number of responses:	651

b. Frequency of Response:	An average of 3 responses per respondent annually
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c. Annual Burden Hours:	109
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d. Estimated Completion Time:	10 minutes
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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 \$2,616. (109 burden hours x \$24 per hour).

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

14. The annual cost to the Federal Government for administering this information collection activity is \$3,871 based on 217 respondents submitting 651 responses.

- (a) A processing cost of \$833. This cost is based on each response taking approximately 5 minutes to process by a GS 4/5 clerk (\$15.35 hourly wage) located in the Finance Division at a VA Regional Office.
- (b) An administrative cost of \$434. This amount is based on an administrative cost of \$.50 for forms development, design, and distribution (stamps and envelopes) [217 respondents x 4 times per year x \$.50].
- (c) School reporting fees cost of \$2,604 (217 respondents x \$12). The cost to the school respondent for processing is offset by the reporting fee of \$12.00 per claimant or respondent (217). VA pays each school that furnishes training a fee for processing all required VA reports or certifications for each veteran or other claimant (respondent). VA refers to these fees as "school reporting fees." 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 authorized in 38 U. S. C. 3684.

15. The reduction in the annual burden from 821 down to 217 is due to the decreased number of individuals pursuing correspondence courses. It is believed that technology and the availability of online courses is contributing to this decrease in individual's pursuing correspondence courses.

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 does not employ statistical methods.