**SUPPORTING STATEMENT FOR VA Form 22-6553d and 22-6553d-1**

**Monthly Certification of On-The-Job and Apprenticeship Training**

**(2900-0178)**

A reference to VA Form 22-6553d also includes VA Form 22-6553d-1 unless otherwise specified. The VA Form 22-6553d-1 contains the same information as VA Form 22-6553d. There is no distinction in content between the forms, only that the 22-6553d is computer generated and relies on a 9700 laser printer, and the 22-6553d-1 relies on a bulk printer and is to be used by regional processing offices whenever the computer generated printer is not available.

**A. Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

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. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.**

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 changes, amendments, or terminations. The form also provides an effective date if there are any adjustments required.

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.

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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Information technology is helping to reduce the burden. The electronic collection is made via an internet-based application called Veterans Online Application (VONAPP) that collects the same information as the printed VA Forms 22-6553d and 22-6553d-1. VONAPP allows applicants to submit information directly to the Regional Processing Office (RPO) with jurisdiction over the claim, reducing potential error and speeding the application process.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

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. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

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**. **Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.**

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

**8.a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.**

The Department notice was published in the Federal Register on October 10, 2014, Vol. 79, No. 1971, page 61375. No comments were received in response to this notice.

**b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.**

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

**9**. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

VA does not provide any payments or gifts to respondents.

**10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

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. Information will be protected as described in the system of records notice, Compensation, Pension, Education and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) contained in the Privacy Act Issuances, 2011 Compilation.

**11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

None of the information collected is considered to be of a sensitive nature.

**12. Estimate of the hour burden of the collection of information:**

The estimated annual burden for the collection of the information is determined as follows:

# Average Number of Respondents: 7,589

1. Frequency of Response: 9 responses per respondent annually
	* Number of Responses Annually = 68,301
2. Annual Burden Hours: 11,384
3. Estimated Completion Time: 10 minutes
4. 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 $273,216.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

This submission does not involve any record keeping costs.

**14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The annual cost to the government for administering this form is estimated at $106,953 based upon 68,301 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 47,811 responses) is $61,158. This is based on the annual salary of a clerk in the Finance Division at the regional office, GS 4, step 5 ($15.35 per hour), and a processing time of 5 minutes per response; hence,

(47,811 X $15.35 5 / 60).

 b. The annual estimated processing cost of forms which do involve a termination of training (approximately 30% or 20,490 responses) totals $44,429. This is based on the annual salary of a veterans claims examiner GS 9, step 5 ($26.02 per hour), and a processing time of 10 minutes per response; hence (20,490 X $26.02 X 10 / 60).

 c. Costs to print these forms is estimated to be $1,366 per year (68,301 x $.02)

**15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14 of the OMB form 83-1.**

The decrease in this annual burden is due to the decrease in the number of On-the-Job and Apprenticeship trainees. The expiration date placeholder has been added to the forms.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

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

**17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

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

**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.**

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.