

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

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 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. 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 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. 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 currently is being used to collect this information. Flight schools may submit this information by either using the paper form or using the electronic system, VA-ONCE (VA Online Certification of Enrollment).

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 that 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 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. 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.

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. 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 the information does not require any special circumstance.

8. 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 March 28, 2016, Volume 81, Number 59, page 17246. No comments were received in response to this notice.

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

VA does not provide any payment 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.

After processing the VA Form 22-6553c, the form is scanned into the claimant's record at the regional processing offices. Our assurance of privacy 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. 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 questions on this form are considered to be of a sensitive nature.

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

Estimate of Information Collection Burden.

- a. Number of Respondents: 2,576
 - i. Number of responses: 15,456 - This figure is based on 2,576 respondents who are estimated to complete an average of six responses per year for 15,456 annual responses.
- b. Frequency of Response: On occasion. The approximate number of responses received annually per respondent is 6 responses.

- c. Annual Burden Hours: 7,728 [$2576 \times 6 \times 30 / 60 = 7728$ annual burden hours].
- d. Estimated Completion Time: 30 minutes
- e. The respondent population is composed of Veterans who are enrolled in and pursuing flight training. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection. The Bureau of Labor Statistics gathers information on full-time wage and salary workers. Accordingly, the median weekly earnings of full-time wage and salary workers are \$809.20. Assuming a forty (40) hour work week, the median hourly wage is \$20.23. Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$156,337 (7728 burden hours x \$20.23 per hour).

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 the form is estimated to be \$136,992 based on 15,456 responses annually. This cost is determined as follows:

- a. The processing cost of \$136,992 is based on an estimate that a GS 9/5 employee will have to review each application. The salary for such an employee is \$26.59 per hour. We estimate it

will take 20 minutes to review each claim. (15456 claims x \$26.59 x 20 min /60 min = \$136,992)

- b. There are no administrative costs associated with this information collection.

15. Explain the reason for any burden hour changes since the last submission.

The burden hour increase is due to the increase in the number of individuals participating in flight training.

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 not display 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 information collection fully complies with all the requirements of 5 Code of Federal Regulations 1320.8(b)(3).

B. Collection of Information Employment Statistical Methods

This collection of information does not employ statistical methods. If statistical methods are employed, Part B must be completed.