

## SUPPORTING STATEMENT

VA Form 22-6553(b)(b-1)	Certificate of Lessons Completed OMB-2900-0353
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### 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 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. 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 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. 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.**

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. 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.**

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

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

The collection of information does not involve small businesses or entities.

**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.**

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. 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.**

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines:

**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 notices were published in the Federal Register on May 21, 2018, Volume 83, Number 98, pages 23530 and 23531. No comments were received from the public in response to this notice.

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

No payments or gifts to respondents have been made under this collection of information.

**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.**

VA Form 22-6553b/b-1 is retained permanently in the claimant's electronic education folder. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Vocational Rehabilitation and Employment Records – VA (58VA21/22/28), which is 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 of a sensitive nature.

**12. Estimate of the hour burden of the collection of information. Please show mathematical calculations:**

The average number of responses received for the years 2015, 2016 and 2017 were 224

submissions with each respondent submitting 3 forms per annually.

- a. **Number of Responses:** 672 (224 X 3 per respondent)
- b. **Frequency of Response:** 3 responses annually
- c. **Annual Burden Hours:** 112 hours
- d. **Estimated Completion Time for Respondent:** 10 minutes
- e. There is no estimated annual cost to the public as costs incurred are offset by school reporting fees paid by VA. The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$973.60. Assuming a forty (40) hour work week, the mean hourly wage is \$24.34 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm), May 2017).

Legally, respondents may not pay a person or business for assistance 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 \$2,726(112 burden hours x \$24.34 per hour).

**13. Provide an estimate of the total annual cost burden to respondents or recordkeeping 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.**

**Estimated Costs to the Federal Government:**

Grade	Step	Burden Time Employee	Hourly Rate	Cost Per Response	Total Responses	Total
4--	5	5min	16.21	--	--	
Overhead at 100% Salary						\$296.00

Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.	
Processing / Analyzing Costs	\$296.00
Printing and Production Cost	\$0
<u>Total Cost to Government</u>	\$296.00

**Note:** The hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/RUS_h.pdf)

This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of the grade level spend to process to completion a claim received on this form

38 U.S.C. 3684 directs VA to pay each institution \$11 for each student certified or \$15 for any students certified for advance payment during the calendar year.

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

The change in the annual burden is due to a slight increase in the number of forms (VA Form 22-6553b and VA Form 22-6553b-1) submitted.

This ICR expired due to the transition of systems that affected the process for ensuring that expiring VA Education ICR's were submitted to OMB in a timely manner. The transition has been completed and the information collection request duties have been updated in order to avoid future VA Education ICR's from expiring.

**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.**

The information collection is not for publication or tabulation use.

**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 OMB83-1.**

This submission does not contain any exceptions to the certification statement.

**B. Collection of I information Employing Statistical Methods.**

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