

## SUPPORTING STATEMENT

VA Form 22-6553d and 22-6553d-1	Monthly Certification of On-The-Job and Apprenticeship Training OMB-2900-XXXX
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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 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 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 online electronic collection will be made via the Vets.gov portal which has been implemented using algorithms that help guide the applicant toward completing the application based on their responses to the questions being asked. The implementation and use of Vets.gov helps to reduce the burden while continuing to enable the Veteran to submit the application directly to the Regional Processing Office (RPO) with jurisdiction over the claim, thus reducing potential errors and speeding up 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. 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 April 9, 2018, Volume No. 83 Page 83, Page Number 15238. 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 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. VA assurance of confidentiality is covered by System of Records, Compensation, Pension, Education and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) contained in the Privacy Act Issuances, 2012 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. Please show mathematical calculations:**

The estimated burden to the public for this information collection is 11,384 hours.

- a. Number of Respondents: **7,589 (68,301 responses annually)**
- b. Frequency of Response: **9 responses per respondent annually**
- c. Annual Burden Hours: **11,384 hours**
- d. Estimated Completion Time for Respondent: **10 minutes**
- e. **The respondent population for this VA Form consists of veterans who are pursuing approved programs of education. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as educational background and wage potential of respondents. Therefore, VBA used general wage data for "All Occupations" 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. 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 of all respondents to be \$277,087 (11,384 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. Estimated Costs to the Federal Government:**

Grade	Step	Burden Time Employee	Hourly Rate	Cost Per Response	Total Responses	Total
09	05	10 min	27.48	--	20,490	\$ 93,844
04	05	5 min	16.21	--	47,811	\$ 64,585
Overhead at 100% Salary						\$158,429

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	\$ 0
Printing and Production Cost	\$ 1,366
<u>Total Cost to Government</u>	\$159,795

**Note:** The hourly wage information above is based on the hourly General Schedule (Base) Pay [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/20187/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/20187/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.

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

There is no change in the annual burden.

**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 OMB83-1.**

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. If statistical methods are employed, Part B must be completed.

