

SUPPORTING STATEMENT-2021

Monthly Certification of On-The-Job and Apprenticeship Training
VA Form 22-6553d and 22-6553d-1
OMB #2900-0178

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.; chapter 1606 of title 10, U. S. C.; and Section 903 of Public Law 96-342.

The following administrative and legal requirements necessitate the collection:

- A. Public Law 115-89 “Veterans Apprenticeship and Labor Opportunity Reform Act” 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.

Benefits are authorized monthly based on the number of hours worked by the trainee as 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.

Public Law 115-89 “Veterans Apprenticeship and Labor Opportunity Reform Act” (VALOR Act) was signed into law on November 21, 2017. Section 3 of this law amended 38 U.S.C. 3680(c) to eliminate the trainee’s certification requirement. As a result, this form is only completed, signed, and certified by the training establishment to report the trainee’s number of hours worked and/or to report the trainee’s date of termination. The form no longer requires the signature of the trainee. The form is then sent to the Regional Processing Office (RPO) for processing.

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. For trainees receiving Post 9/11 GI Bill benefits, the training establishment can submit the monthly training hours through an online certification process. Otherwise the form is available for use through the va.gov portal at <https://www.va.gov/find-forms/about-form-22-6553d-1/> which is then completed and mailed to the appropriate RPO. Education Service has recently focused on a managed service which will build additional processes to encourage more online electronic collections of this data within the next few years.

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 is required to be collected by every training establishment approved for VA Education benefits regardless of the size as prescribed by statute. The form must be submitted for any student receiving VA educational benefits when training in “on-the-job training” establishments or apprenticeship programs. For that reason, the information collection cannot be reduced for small training 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 timely, while preventing any overpayment of benefits for any extended period.

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 August 25, 2021, Volume No. 86, Page Number 47539. 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.

When VA Form 22-6553d-1 reports the training hours, the form is retained in the electronic claims folder at Regional Processing Office (RPO). VA assurance of confidentiality is covered by System of Records, Compensation, Pension, Education and Veteran Readiness 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. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I. Provide estimates of annual cost to respondents for the hour burdens for collections of

information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.

The estimated burden to the public for this information collection is **2,577,536 burden hours**.

- a. Estimated Number of Respondents: **107,397** (From a total of 3,866,306 responses reported as received over past 3 years = 1,288,768 /12 forms received per respondent annually).
- b. Estimated Frequency of Response: **12 responses per beneficiary annually** [12 responses per individual has been factored into the calculation for item 12a above].
- c. Annual Burden Hours: **214,794 hours** [$107,397 \times 12 \times 10 / 60 = 214,794$ Burden Hours].
- d. Estimated Completion Time for Respondent: **10 minutes**
- e. The respondent population is composed of training establishments offering on-the-job training and apprenticeship programs who complete the form for beneficiaries who are enrolled in and pursuing this 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 (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 \$1,082.80. Assuming a forty (40) hour work week, the mean hourly wage is \$27.07 based on the BLS wage code – “00-0000 All Occupations.” ($\$27.07 \times 40$ hours). This information was taken from the following websites:

<https://vaww.infoshare.va.gov/sites/educationservice/pro/Lists/Procedures%20Task%20Creation/Attachments/43/May%202020%20National%20Occupational%20Employment%20and%20Wage%20Estimates%20BLS.html>, May 2021).

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 \$5,814,473.58 (214,794 burden hours X \$27.07 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.

The annual cost to the U. S. Government for administering the forms is estimated at \$519,443.49. This estimate is based on 107,397 responses received annually.

Estimated Costs to the Federal Government for Question #14 is calculated as shown below:

Note: The hourly wage information above is based on the hourly 2021 General Schedule (Base) Pay

Grade		Burden Time	Hourly Rate	Cost Per Response	Total Responses/Forms	Total
09	05	10	\$29.02	\$4.83	107,397	\$519,443.49
Overhead at 100% Salary						\$0.00
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						\$0.00
Processing / Analyzing Costs						\$519,443.49
Printing and Production Cost						\$0
Total Cost to Government						\$519,443.49

<https://vaww.infoshare.va.gov/sites/educationservice/pro/Lists/Procedures%20Task%20Creation/Attachments/43/2021%20GS%20Rates.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 an increase in burden hours due to there being more respondents who submit the form annually. The form is submitted an average of 12 times annually instead of 9 times as previously reported during the last renewal submission.

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, Supporting Statement Part B must be completed.