

**2022 SUPPORTING STATEMENT FOR:
MONTHLY CERTIFICATION OF FLIGHT TRAINING**

VA Form 22-6553c

(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 individuals enrolling in, and pursuing approved vocational flight training under Chapters 30, 31, 32, 33, and 35 of title 38, U.S.C.; and Chapter 1606 of title 10, U.S.C.; Section 903 of Public Law 96-342; the National Call to Service (NCS)10 U.S.C., and 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 individual 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, 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 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 by 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 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.

Payment of educational assistance benefits for flight training cannot be made without the information (either a completed paper form or electronically). 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.

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 notice was published in the Federal Register on June 15, 2022, Volume 87, Number 12830, page 36209. 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.

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.

After processing the VA Form 22-6553c, the form is scanned into the claimant's "The Image Management System", (TIMS) file at the appropriate regional processing office. Our assurance of privacy is covered by 38 U.S.C. 5701 and our System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), which are 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

There are no questions of a sensitive nature.

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

Estimate of Information Collection Burden.

- a. Number of Respondents: **3,055** (Based on the average number of the responses received of 9,166 from calendar years 2019, 2020 and 2021; 9,166 / 3 years).
- b. Frequency of Response: **On occasion**. The approximate number of responses received each year per respondent is 6 responses.

c. Annual Burden Hours: **1,527** (3,055 X 30min / 60min).

d. Estimated Completion Time: **30 min.**

e. The respondent population is composed of Veterans who are enrolled in and are 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 (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 \$1,120.40. Assuming a forty (40) hour work week, the **mean hourly wage is \$28.01 based on the BLS wage code – “00-0000 All Occupations.” (\$28.01 X 40 hours).** This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm May 2021.

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 \$42,771.27 (1,527 burden hours x \$28.01 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).

There are no questions of a sensitive nature.

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 | Hourly Rate | Cost Per Response | Total Ave Ann | Total |
|-------|------|-------------|-------------|-------------------|---------------|-------|
|-------|------|-------------|-------------|-------------------|---------------|-------|

| | | Employee | | | Responses | |
|--|----|----------|---------|--------|-----------|--------------------|
| 09 | 05 | 20 min | \$29.72 | \$9.90 | 3,055 | \$30,264.86 |
| Overhead at 100% Salary Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total. | | | | | | \$30,264.86 |
| Processing / Analyzing Costs | | | | | | \$30,264.86 |
| Printing and Production Cost | | | | | | \$0 |
| Total Cost to Government | | | | | | \$30,264.86 |

Note: The hourly wage information above is based on the hourly 2022 General Schedule (Base) Pay.

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/RUS_h.pdf

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.

The burden hours have decreased from the last renewal submission due to a decrease in the number of flight certifications received from 2019, 2020 and 2021 calendar years for individuals attending 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 submission does not contain any exceptions to the certification statement.

B. Collection of Information Employment Statistical Methods

This collection of information does not employ statistical methods.

If statistical methods are employed, Part B of a Supporting Statement must be completed.