

SUPPORTING STATEMENT – PART A

APPLICATION FOR APPROVAL OF A LICENSING OR CERTIFICATION TEST AND ORGANIZATION OR ENTITY

OMB CONTROL NUMBER 2900-0697

Summary of Changes from Previously Approved Collection

- Application for Approval of a Licensing or Certification Test and Organization or Entity.
- There is no form attached to this Information Collection.
- There is an increase in burden for this information collection, as the average number of annual responses received for the licensing or certification tests and the organizations offering them has increased for periods 2021, 2022 and 2023. This submission is therefore being submitted as a Revision.
- No comments were received during the 60-day public comment period.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

38 U.S.C. 3689 authorizes the Secretary of Veterans Affairs to approve licensing and certification tests for payment under the educational programs if the tests and the organizations offering them meet certain statutory requirements. To meet these requirements, the organizations must make certain certifications, and supply necessary information, to assess the test. The statute further allows the Secretary to delegate the approval functions to the State Approving Agencies (SAAs). The organizations provide the certifications and information to the SAAs for the Department of Veterans Affairs (VA).

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.

SAAAs and VA will use the information to decide whether the licensing and certification tests, and the organizations offering them, should be approved for use under the education programs VA administers.

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 did not develop an official form for this information collection since section 3689 of title 38, United States Code permitted VA to delegate the approval functions to the State Approving Agencies; and from the inception of this information collection, VA has given the State Approving Agencies the authority to approve licensing and certification tests and organizations. Consequently, the State Approving Agencies have developed their own forms to gather information they will need per their respective state laws to decide whether the licensing and certification tests and the organizations offering them should be approved. In the case of an organization seeking approval directly from VA, any information VA receives concerning the request for approval is forwarded directly to the appropriate State Approving Agency. Since SAAs have approval authority, education institutions and licensing and certification organizations supply information to the SAAs for approval in a manner specified by the SAA.

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.

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

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

This information collection does not impose a significant economic impact on a substantial number of 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 the SAAs and VA do not collect this information, no licensing or certification test could be approved or paid. The statute specifically requires certain certifications before these tests can be approved for use by the organization offering them.

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.

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

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.

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, June 17, 2024. The 60-Day FRN citation is Volume 89, FRN 51391, Pages 51391-51392. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Thursday, August 22, 2024. The 30-Day FRN citation is Volume 89, FRN No 68031.

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

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

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 approving organization, either an SAA or VA, will retain any written documents. Approval folders are destroyed occasionally, usually after the approved organization no longer wishes to be approved. If the approval folder is destroyed, the documents on which the information is collected will be destroyed also. Our assurance of confidentiality is covered by 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.

No questions considered sensitive are being asked in this collection.

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.

Estimation of Respondent Burden:

No VA Form

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There was a total of 3,454 responses received for calendar years 2021, 2022 and 2023, resulting in an average annual receipt of 1,151 responses. The result calculates to a total of 3,453 annual burden hours.

- a. Number of Respondents: 1,151 received annually.
- b. Frequency of Response: On Occasion.
- c. Annual Burden Hours: 3,453 (1,151 X 180 minutes / 60).
- d. Estimated Completion Time for Respondent: 3 hours.
- e. The respondent population consists of the number of SAA approved licenses and certifications as submitted by SAAs. 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 median weekly earnings of full-time wage and salary workers is \$1,259.20. Assuming a forty (40) hour work week, the median hourly wage is \$31.48 based on the BLS wage code of "00-000-0000 for "All Occupations." This information was taken from the following website https://www.bls.gov/oes/current/oes_nat.htm., May 2023.

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. The VBA estimates the total respondent cost to be \$108,700.44 (3,453 burden hours X \$31.48 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 recordkeeping/reporting fees/costs associated with this collection. There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

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: \$290,052.00.

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
12	3	N/A	--	--	--	N/A
Overhead at 100% Salary						\$0
9	3	N/A	--	--	--	N/A
Overhead at 100% Salary						\$0
7	3	N/A	--	--	--	N/A
Overhead at 100% Salary						\$0
Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.						
Processing / Analyzing Costs-SAAs (3,453 Burden Hours X 3 hours or 180 minutes X the continuous standard SAA cost of \$28.00 for each claim divided by 60 minutes). Cost for SAA is capped at \$28.00.						\$290,052.00
Printing and Production Cost - Forms are not available on the VA inter/intranet forms websites as there is no official OMB form associated with this collection.						\$0
Total Cost to Government						\$290,052.00

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

There is an increase in burden for this information collection, as the average number of annual responses received for the licensing or certification tests and the organizations offering them has increased for periods 2021, 2022 and 2023.

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 results of this information collection will not be published.

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 display of the expiration date of the OMB approval on the collection instrument.

18. Explain each exception to the certification, "Certification for Paperwork Reduction Act Submissions," of OMB83-1.

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.

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.