

Supporting Statement – PART A

MONTHLY CERTIFICATION OF ON-THE-JOB AND APPRENTICESHIP TRAINING OMB CONTROL NUMBER 2900-0178

Summary of Changes from Previously Approved Collection

- o Monthly Certification of On-The-Job and Apprenticeship Training.
- o There are no changes to the form during this submission other than updating the respondent burden paragraph based on the newly received template format and to add Mariana Islands and American Samoa to the VA Jurisdiction Chart underneath Muskogee RPO.
- o The burden has significantly decreased based on the number of decreased data instruments received for calendar years 2021, 2022 and 2023. There was only an average of 19,670 monthly certifications received for these periods.
- o This information collection request is being submitted as a Revision.

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. 8 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 in a training capacity 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 VA Education benefits, the training establishment can submit the monthly training hours through an online certification process known as VA-Once. 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.

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.

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.

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 Wednesday, October 2, 2024. The 60-Day FRN citation is Volume 89, FRN Page(s) 80307-80308.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Monday, December 9, 2024. The 30-Day FRN citation is Volume 89, FRN No 97707.

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.

Following receipt of reported training hours on VA Form 22-6553d-1, the form is retained in the electronic claims folder at the Regional Processing Office (RPO). Our assurance of confidentiality 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.

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.

There was a total of 708,138 collections of the “Monthly Certification of On-The-Job and Apprenticeship Training” instruments received for calendar years 2021, 2022 and 2023, resulting in an average annual receipt of 236,046 responses / 12 instrument received from each respondent. The result calculates to a total of 39,340 burden hours.

a. Estimated Number of Respondents: **19,670** (From a total of 708,138 responses reported as received over past 3 years = 236,046 /12 forms received per respondent annually).

b. Estimated Frequency of Response: 12 responses per beneficiary annually [12 responses per individual have been factored into the calculation for item 12a above].

c. Annual Burden Hours: **39,340** hours [19,670 X 12 X 10min./ 60min = 39,340 Burden Hours].

d. Estimated Completion Time for Respondent: 10 minutes.

e. The respondent population is composed of training establishments with approved on-the-job and apprenticeship programs who complete the form for VA beneficiaries who are 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 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. VBA estimates the total cost to all respondents to be \$1,238,423.20 (39,340 burden hours X \$31.48 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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 Labor Cost to the Federal Government: \$213,485.06.

[Monthly Certification of On-The-Job and Apprenticeship Training, VA Form 22-6553d-1; 22-6553d].

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Number of Responses	Total
GS-09	05	10 min	\$32.56	\$10.85	19,670	\$213,485.06 (39,340 X \$32.56 X 10 min. / 60 min.)
Overhead at 100% Salary						\$213,485.06
Overhead charges are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						\$213,485.06
Processing / Analyzing Charges						\$213,485.06
Printing and Production Cost						\$ 0.00
Total Cost to Government						\$213,485.06

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx.

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 has significantly decreased based on the number of decreased data instruments received for calendar years 2021, 2022 and 2023. There was only an average of 19,670 monthly certifications received for these periods.

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 statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

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