

SUPPORTING STATEMENT – PART A

Certification of Lessons Completed – OMB 2900-0353

Summary of Changes from Currently Approved Collection

- The ICR is associated with rulemaking RIN 2900-AQ88
- Updated total Cost to all Respondents
- Updated Cost to Federal Government

1. Need for the Information Collection

The Department of Veterans Affairs (VA) is required to pay education benefits for correspondence training under chapters 30, 32, 33, and 35 of title 38, United States Code, and chapter 1606 of title 10, U.S.C., section 903 of Public Law 96-342, the National Call to Service Provision of Public Law 107-314, and the Omnibus Diplomatic Security and Antiterrorism Act of 1986. Benefits are payable quarterly based on the number of lessons completed by the student and serviced by the school. Benefits are not payable when training is interrupted, discontinued or previously completed.

The student receives VA Form 22-6553b, Certification of Lessons Completed, completes their portion showing the number of lessons completed since the previous certification of lessons were completed, and sends the form to the school.

The school's Certifying Official certifies the number of lessons serviced by the school and sends the form to VA for processing. VA Form 22-6553b and VA Form 22-6553b-1 are identical forms; however, VA Form 22-6553b is computer-generated quarterly (i.e., March, June, September, and December) for chapter 35 students with their name, mailing address, and other pertinent information printed on the form at the time the form is generated. VA Form 22-6553b-1 is used for students in other VA education benefit programs, and the student's name, mailing address and other pertinent information is entered on the form manually. For this submission however, these two forms are considered to be one and the same.

The following administrative and legal requirements necessitate the collection:

a. 38 U.S.C. 3032(d), 3034, 3241, 3323, 3474, 3481, 3484, 3534(b), 3680(b), 3684, 3686(a), and 10 U.S.C 16131(e), and chapter 31 section 510.

b. 38 C.F.R. 21.4203(e), 21.4206, 21.5200(d) & (g), 21.7140(c)(3), 21.7159, 21.7640(a)(4), 21.7659, and 21.9720.

This collection of information is associated with rulemaking RIN 2900-AQ88.

2. Use of the Information

VA uses information from the current collection to determine the number of lessons completed by the student and serviced by the correspondence school, and to determine the date of completion or termination of correspondence training. VA pays education benefits based on the information furnished on the form. Without this information, VA would be unable to determine the proper payment or the student's training status.

3. Use of Information Technology

The electronic version of the VA Form 22-6553b-1 is available on the va.gov website in a fillable electronic format.

4. Non-duplication

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

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Technology

If this information is not collected or were collected less often, VA would not be able to properly administer payments. The Certification of Lessons Completed (VA Form 22-6553b) is sent quarterly by the student/school to apply for payment for completing correspondence lessons. There are no technical or legal obstacles to reducing the burden of this information collection.

7. Paperwork Reduction Act Guidelines

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines:

8. Consultation and Public Comments

Part A

The associated proposed rule, RIN 2900-AQ88, was published in the Federal Register on May 24, 2023, Volume 88, Number 100, page 33672. No comments pertaining to the collections of information were received in response to this notice.

Part B

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

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

10. Confidentiality

VA Form 22-6553b/b-1 is retained permanently in the claimant's electronic education folder. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), which is contained in the Privacy Act Issuances, 2012 Compilation.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

VA Form 22-6553b/b-1 Certification of Lessons Completed

- a. Number of Responses: 616 (154 X 4 per respondent)
- b. Frequency of Response: Quarterly
- c. Annual Burden Hours: 103 hours
- d. Estimated Completion Time for Respondent: 10 minutes
- e. The respondent population for the VA Form 22-6553b-1, which are issued on a quarterly basis, consists of beneficiaries that report the number of correspondence course lessons completed, and for the correspondence schools to report the number of lessons serviced.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data the mean hourly wage is \$31.48 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.

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 \$3,232 (102.66 burden hours x \$31.48 per hour).

13. Respondents Costs Other Than Burden Hour Costs

This submission does not involve any record keeping costs.

14. Cost to the Federal Government

VA Form 22-6553b and VA Form 22-6553b-1, Certification of Lessons Completed

Grade		Burden Time	Hourly Rate	Cost Per Response	Total Responses/Forms	Total
09	05	5min	\$32.56	\$2.71	616	\$1,671.41
Overhead at 100% Salary						\$1,671.41
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						\$1,671.41
Printing and Production Cost						\$0
Total Cost to Government						\$1,671.41

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

15. Reasons for Change in Burden

There has been no change in the burden since the last approval.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the expiration date for OMB approval.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

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