

SUPPORTING STATEMENT – PART A

Monthly Certification of Flight Training – OMB 2900-0162

Summary of Changes from Currently Approved Collection

- The ICR is associated with rulemaking RIN 2900-AQ88
- Annual Burden increased
- Updated total Cost to all respondents
- Updated Cost to Federal Government

1. Need for the Information Collection

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. Use of the Information

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. Use of Information Technology

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. 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 Collection

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. Paperwork Reduction Guidelines

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. Consultation and Public Comments

A. Public Comments

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.

B. Consultation

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

9. Gifts or Payments

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

10. Confidentiality

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. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

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VA Form 22-6553c

- a. Number of Responses: 23,400 (3,900 respondents each submitting 6 responses per year)
- b. Frequency of Response: On occasion.
- c. Annual Burden Hours: 11,700 (23,400 X 30min / 60min)
- d. Estimated Completion Time: 30 minutes
- 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 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, 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 \$368,316 (3,900 X 6 X 30min / 60min x \$31.48 per hour).

13. Respondent Cost other than Burden Hour Cost

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. Cost to the Federal Government

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Grade	Step	Burden Time Employee	Hourly Rate	Cost Per Response	Total Ave Ann Responses	Total
09	05	20 min	\$32.56	\$10.85	23,400	\$253,968
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.						\$253,968
Processing / Analyzing Costs						\$253,968
Printing and Production Cost						\$0
Total Cost to Government						\$253,968

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

The burden has increased since the previous approval due to a provision in the associated rulemaking, RIN 2900-AQ88, which constituted an increase in the estimated number of respondents, resulting in an increase in the reporting burden hours.

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 Act Submissions

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