SUPPORTING STATEMENT – PART A

Recordkeeping at Flight Schools

OMB #2900-0613

Summary of Changes from Previously Approved Collection

- Title: Recordkeeping at Flight Schools.
- No changes were made to the collection.
- This information collection request has been entered in ROCIS as a "Revision" due to the increase in burden hours.
- No comments were received in response to the 60-day federal register notice.

A. Justification

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

Educational institutions are required by statute (38 U.S.C. 3690(c)) to maintain records and accounts of eligible Veterans and other eligible persons who receive educational assistance, and the records of other students that are necessary to determine if the educational institution is complying with the provisions of law governing approval of courses for VA training. This requirement is implemented by 38 CFR 21.4263(h)(3) which sets forth records VA expects a flight school to maintain in order to retain approval for its courses.

While 38 CFR 21.4263(h)(3) establishes the records that VA expects a flight school to maintain, there is not a uniform method or instrument of collection because VA does not have control over the form or format of the records. The flight school may retain the records in any form or format it sees fit, such as, but not limited to, a ledger, or a cabinet full of papers. However, when the VA completes a compliance survey at the flight school, the flight school is required to produce all its records.

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.

The State Approving Agencies that approve courses for VA training use these records to determine if courses offered by flight schools should be approved. VA representatives use the records to determine the accuracy of payments made to VA students at flight schools.

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.

The regulation does not require any reports. It only requires recordkeeping. Flight schools have the option to store these records electronically.

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 flight schools do not keep these records, State approving agencies may not know whether to approve a course, and VA will not be able to verify the accuracy of VA educational payments made to students training at flight schools.

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 publications 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, January 6, 2025. The 60-Day FRN citation is Volume 90, FRN 741. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Tuesday, April, 22, 2025. The 30-Day FRN citation is Volume 90, FRN No 16915.

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.

The records are maintained in the appropriate Privacy Act System of Records identified as “Compensation, Pension, Education, and Veteran Readiness and Employment Records – VA (58VA 21/22/28),” published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

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.

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This does not impose any reporting burden (where a school must submit records at a given time interval); it does impose a recordkeeping burden on flight schools.

a. **Number of Responses:** 3,949 (19,747 / 5 years; 2020, 2021, 2022, 2023 and 2024).

b. **Frequency of Response:** Annual.

c. **Annual Burden Hours:** 1,316 hours (3,949 X 20 minutes /60 minutes).

d. **Estimated Completion Time for Respondent:** 20 minutes. (VA continues to consider that a school will need approximately 20 minutes (one third of an hour) to generate and store the records pertaining to each student that would not be kept in the ordinary course of business, or in compliance with FAA regulations.).

e. The respondent population for this information collection, OMB #2900-0613, is composed of employees at flight schools. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential or 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 $41,427.68 (1,316 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.

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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.

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Estimated Costs to the Federal Government: $35,402.78

Grade	Step	Burden Time	Wage X Hr.	Cost Per Hr.	Total Responses	Total Gov Cost
10	05	15 min	$35.86	$8.96	**3,949**	**$35,402.78 (3,949 X $35.86 X 15 min divided by 60 min)**
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Overhead at 100% Salary						**$35,402.78**
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						-0-
Processing / Analyzing Costs						**$35,402.78**
Printing and Production Cost						**$0**
Total Government Cost						**$35,402.78**

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 VA employees of the grade level spend to review and process the flight school records.

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

The burden has increased since the previous approval. For this approval, the increase considers 5 years of data for calendar year periods 2020, 2021, 2022, 2023 and 2024.

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 omit 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.