

SUPPORTING STATEMENT FOR VA FORMS 22-6553b and 22-6553b-1
Certificate of Lessons Completed
(2900-0353)

A. Justification.

1. 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, chapters 1606 and 1607 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 completed. The student receives VA Form 22-6553b, Certification of Lessons Completed, completes his or her portion showing the number of lessons completed since the previous certification of lessons 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 is generated quarterly (i.e., March, June, September, and December) for chapter 35 students. VA Form 22-6553b-1 is identical to VA Form 22-6553b, except VA Form 22-6553b-1 is printed, and the student's name, mailing address and other pertinent information is added later either manually or by using a personal computer program. VA Form 22-6553b is computer generated with the chapter 35 student's name, mailing address and other pertinent information being added at the time that the form is generated and mailed. VA Form 22-6553b-1 is sent to students in the other VA benefit programs. For this submission, these two forms are considered to be one and the same.

The following statutes and regulations require this information collection:

- a. 38 U. S. Code 3032(d), 3034, 3241, 3474, 3481, 3484, 3534(b), 3680(b), 3684, 3686(a), and 10 U. S. Code 16131(e), 16136(b), chapter 31, section 510 and chapter 1607.
- b. 38 Code of Federal Regulations 21.4203(e), 21.4206, 21.5200(d) & (g), 21.5292(e)(2), 21.7140(c)(3), 21.7159, 21.7640(a)(4) and 21.7659.
- c. Public Law 110-252

2. 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. Information technology is not being used to reduce the information collection burden due to the small number of individuals pursuing correspondence courses and VA's inability to accept electronic signatures. It is believed that technology, availability of online courses, is contributing to the decrease in individuals pursuing correspondence courses. Additionally, this form requires an authentic signature from both the trainee and the educational institution. Currently, VA is unable to accept electronic signatures.

4. VA is not aware of any duplication of this information collection.

5. The information collection does not have a significant impact on a substantial number of small entities. It cannot be reduced for correspondence schools with small enrollments. The information is required by statute to administer correspondence training under the different education programs. The information requested from the school official is minimal. School officials are generally required to provide the information approximately three times annually for each student.

6. 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 is used 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. The collection of this information does not require any special circumstances.

8. A notice regarding this information collection was published on page 66691 of the Federal Register dated November 10, 2008. No comments were received.

9. VA does not provide any payment or gifts to respondents.

10. If VA Form 22-6553b (or 22-6553b-1) reports continued training, the form is retained in the Finance Activity in the Regional Office. If VA Form 22-6553b (or 22-6553b-1) reports the termination of training, the form is retained in the claimant's electronic education records. Our assurance of confidentiality is covered by our System of Records, Compensation, Pension, Education, and Vocational Rehabilitation Records - VA (58VA21/22/28), contained in the Privacy Act Issuances, 2001 Compilation.

11. None of the questions on this form are considered to be of a sensitive nature.

12. The estimated annual burden to the public in hours is 411. This estimate is determined as follows:

From FY 2007 through FY 2008, VA had an average of 821 respondents annually. We assumed that the average number of respondents would remain stable over the next three years at 821 per year. The cost to the student respondent is \$6,165 based on 10 minutes completion time for 2,463 responses (3 responses per respondent) annually, equals 411 hours at \$15.00 per hour (includes mailing costs).

13. This submission does not involve any record keeping costs.

14. The annual cost to the Federal Government for administering this information collection activity is \$10,294 based on 2,463 responses.

(a) A processing cost of \$3,315. This cost is based on each response taking approximately 5 minutes to process by a GS 4/5 clerk (\$16.15 hourly wage) located in the Finance Division at a VA regional office.

(b) An administrative cost of \$1,232. This amount is based on an administrative cost of \$.50 for forms development, design, and distribution (stamps and envelopes).

(c) School reporting fees cost of \$5,747. The cost to the school respondent for processing is offset by the reporting fee of \$7.00 per claimant or respondent (821). VA pays each school that furnishes training a fee for processing all required VA reports or certifications for each veteran or other claimant (respondent). VA refers to these fees as "school reporting fees." The reporting fee is in lieu of any other compensation or reimbursement. Reporting fees were established by Public Law 90-77 effective August 31, 1967 and are authorized in 38 U. S. C. 3684.

15. The decrease of annual burden is due to the decrease in the total number of students that take correspondence courses. The decrease in total annual burden, both public and private, may be a result of the increase in the number of online courses being provided. Online courses have become a popular alternative to correspondence courses.

16. VA does not publish this information or make it available for publication.

17. The collection instrument, VA Forms 22-6553b and 22-6553b-1, does not display an expiration date and if required to do so would result in unnecessary waste of existing stocks of this form. As these forms are submitted to OMB for approval every three years, this date requirement would also result in an unnecessary burden on the respondents and would delay agency action on the benefit being sought. VA also seeks to minimize the cost to itself of collecting, processing, and using the information by not displaying the expiration date. For these reasons, VA continues to seek an exemption that waives the displaying of the expiration date on VA Forms 22-6553b and 22-6553b-1.

18. This information collection complies with all requirements for fully informing respondents of the information under 5 Code of Federal Regulations 1320.8(b)(3).

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.