

**SUPPORTING STATEMENT FOR VA FORM 22-1990t
(2900-0171)**

A. Justification.

1. The Department of Veterans Affairs (VA) is authorized to pay tutorial assistance under Chapters 30, 32, and 35, Title 38, U.S.C.; Chapters 1606, Title 10, U.S.C., Section 903 of Public Law 96-342, and the Omnibus Diplomatic Security and Antiterrorism Act of 1986. Tutorial assistance is a supplementary allowance payable on a monthly basis for up to 12 months. The student must be training at one-half time or more in a post-secondary degree program, and must have a deficiency in a unit course or subject that is required as part of, or prerequisite to, his or her approved program. The student uses VA Form 22-1990t, Application and Enrollment Certification for Individualized Tutorial Assistance to apply for the supplemental allowance.

On the form, the student provides information such as: name; Social Security number; mailing address; telephone number; program and enrollment information; the course or courses for which he or she requires tutoring; the name of the tutor; and the date, number of hours and charges for each tutorial session. The tutor must verify that he or she provided the tutoring at the specified charges, and that he or she is not a close relative of the student. The Certifying Official at the student's school must verify that the tutoring was necessary for the student's pursuit of a program, that the tutor was qualified, and that the charges for the tutoring did not exceed the customary charges for other students.

2. VA uses the information collected to determine eligibility for tutorial assistance. This form is sent by the applicant to the school for certification and transmission to VA. The school will transmit the form to the appropriate VA regional processing office (i.e., Atlanta, Buffalo, Muskogee, or St. Louis) with jurisdiction over the area where the school is located. Without the information on this form, VA would be unable to determine the applicant's eligibility for tutorial assistance.

3. Information technology at this time cannot be used to reduce the burden of this information collection. Information is collected when the student applies for tutorial assistance.

At the current time, electronic submission is not a realistic option due to the low frequency of the information collection. It is impracticable to set up electronic submission for such a small number of documents collected annually, and for a document that requires multiple (four different) signatures for completion. This form is available on the VA website for the claimant to fill out and print in order to submit to an educational institution.

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 schools or businesses. It cannot be reduced for schools with small enrollments, small businesses or other small entities. The information is required by statute to administer tutorial assistance. The information required is not dependent on the size of the business or entity. The information requested from the schools is kept to a minimum on this form.

6. If this information is not collected or collected less often, VA may not be able to properly administer payments. This would place an unnecessary financial burden on the claimant, who would have to pay for tutoring without assistance from VA. To properly administer payments, VA must have information about the number and date of each tutoring session, the cost for each session, and the total cost for all sessions. The form is used by the claimant at the time of application for tutorial assistance. There are no technical or legal obstacles to reducing the burden of this information collection.
7. The collection of information does not require any special circumstances.
8. The public was informed of the right to submit comments on this information collection. The notice is contained on pages 8932-8933 of the Federal Register dated February 15, 2008. There were no comments received on this information collection.
9. VA does not provide any payment or gifts to respondents.
10. VA Form 22-1990t is maintained in the claimant's education folder. The confidentiality of the information entered on this form is required by our System of Records, Compensation, Pension, Education, and Rehabilitation Records - VA (58VA21/22), that are contained in the Privacy Act Issuances, 2001 Compilation.
11. None of the questions on the form are considered to be of a sensitive nature.
12. The estimated annual burden for the collection of the information is 1,200 hours. We project that the average number of respondents is 600.

This number is based on information from FY 2005, FY 2006, and FY 2007. We have specific computer codes to designate the actual tutorial payments we make under two of our main education programs (chapter 1606 and chapter 30). Our records show that the average number of claims paid under these two programs for FY 2005 through FY 2007 was 300. While we do not have anyway to extract the same information for the other programs, we believe the number of claims filed under the other programs would be about the same. That would make the total respondents 600, with each respondent completing an average of 2 claims.

This estimate is determined as follows:

Number of Annual Respondents:	600
Average Number of Responses Annually:	2
Number of Responses Annually:	1,200
Time per response:	30 minutes
Annual Respondent Burden:	600 hours

The student's and the tutor's time is estimated to be \$15 per hour. Therefore, based on 600 hours of completion time, the cost for completion time is \$9,000. Also, the cost to mail each form is \$0.42 plus \$0.03 for an envelope (1200 responses x \$0.45 mailing cost = \$540). The form is completed by the student, the tutor and a school official. The net cost to the school, to include the certifying official is none because the schools are reimbursed for their time through payment of the annual reporting fee (see Item 14d below).

Summary of cost to the public:

\$ 9,000	Completion Times
\$ 540	Mailing
\$ NONE	Cost to School (Reimbursed by Reporting Fees)
\$ 9,540	TOTAL COST TO PUBLIC

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

14. The annual cost to the U. S. Government for administering the forms is estimated at \$30,650. This estimated is based on 1,200 responses annually. The cost is composed of the following:

a. An initial processing cost of \$4,892 based on processing time of 10 minutes per application in the Education Division using the salary of a GS 9/5 claims examiner (\$24.46 per hour).

b. A secondary processing cost of \$7,996 based on processing time of 20 minutes in the Finance Activity using the salary of a GS 7/5 Financial analyst (\$19.99 per hour).

c. An administrative cost of \$550. This amount is based on the costs for forms development, design, printing and distribution of 1200 forms.

d. An amount of \$17,212 given to schools (which includes the cost of the certifying officials) for reporting information on VA Form 22-1990t. This amount is arrived at by multiplying the projected annual reporting fee of \$3,442,333 for all schools for FY 2009 through FY 2011 by 1/200 (i.e., the estimated portion of the fee attributable to this information collection).

REPORTING FEE INFORMATION: VA pays each school that furnishes training under the various VA education programs a fee for processing all required VA reports or certifications for each veteran or other claimant. VA refers to these fees as "school reporting fees" which help schools to defray the costs of processing paperwork required to be submitted to VA. 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 in 38 U. S. C. 3684.

Summary of Cost to U. S. Government

\$ 4,892	Initial Processing Cost
\$ 7,996	Secondary Processing Cost
\$ 550	Administrative Amount
\$17,212	Reporting Fees
\$30,650	TOTAL

15. The increase in burden hours is due to an adjustment in the previous estimate, which appears to have only included chapter 1606 and chapter 30. We believe the number of claims filed under the other programs would be approximately the same as those represented by chapter 1606 and chapter 30.

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

17. The form does not display an expiration date, and if required to do so it would result in unnecessary waste of existing stock of the forms. As the form is 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 the reasons stated, VA requests an exemption from displaying the expiration date on the form.

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.