

**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, 33, and 35, Title 38, U.S.C.; Chapters 1606 and 1607, 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 identification information; 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 and payment. 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. 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 Department notice was published in the Federal Register on July 22, 2011, page 44090-44091. No comments were received in response to this notice.

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

10. VA Form 22-1990t is maintained in the claimant's education folder. Our assurance of confidentiality is covered by 38 U.S.C. 5701 and our System of Records, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records - VA (58VA21/22/28) which is contained in the Privacy Act Issuances, 2009 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 350 hours. We project that the average number of respondents is 350.

These numbers are based on information from FY 2009 and FY 2010. We have specific computer codes to designate the actual tutorial payments we make under three of our main education programs (chapter 1606, chapter 30, and chapter 33). Our records show that the average number of claims paid under these three programs for FY 2009 through FY 2010 was 175. While we do not have any way to extract the same information for the other programs, we believe the number of claims paid under the other programs would be about the same. That would make the total number of claims paid 350. Using these assumptions, we estimated receipt of 700 responses annually from 350 respondents. The time needed to complete a response is 30 minutes which led to an annual respondent burden of 350 hours ($700 \times 0.50 / 60\text{hr}$).

The student's and the tutor's time is estimated to be \$15 per hour. Therefore, based on 350 hours of completion time, the cost for completion time is \$5,250 ($\15×350). 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.

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 \$8,613.00 ($\$3,271 + \$5,342.00$). This estimate is based on 700 responses annually. The cost is composed of the following:

- An initial processing cost of \$3,271.00 is based on processing time of 10 minutes per application in the Education Division using the salary of a GS 9/5 claims examiner ($\$28.04 \text{ per hour} \times 700 \times 1/6$).
- A secondary processing cost of \$5,342.00 is based on processing time of 20 minutes in the Finance Activity using the salary of a GS 7/5 Financial analyst ($\$22.92 \text{ per hour} \times 700 \times 1/3$).

REPORTING FEE INFORMATION: There is no cost to schools because 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.

15. The burden hours decreased due to an adjustment in the previous estimate, which erroneously doubled the number of respondents leading to an overestimation in burden hours and responses. To correctly calculate the number of respondents, we assume that each payment represents a respondent and each respondent will submit two claims a year. We also assume that the amount of claims paid is the same for the education programs with unavailable data such as Chapter 32, 35, and 1607. Our system collects the total amount of actual tutorial payments made for Chapter 30, 33, and 1606 annually and to obtain the number of respondents, we divide this total amount by two. Subsequently, we multiply this number by two to account for the respondents who used these benefits under Chapter 32, 35, and 1607. This total amount represents the estimate of the total number of respondents annually to this benefit. The total number of respondents assists with determining the annual burden hours and responses.

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.