

**SUPPORTING STATEMENT FOR
Application for Individualized Tutorial Assistance
VA Form 22-1990t
OMB 2900-0171**

A. Justification.

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

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 professor 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.

The 30 day Federal Register Notice (FRN) erroneously shows the frequency of response as "On occasion" and the estimated annual burden as "2,000 hours." This was entered in error. The correct frequency of response for this information collection is "semi-annually" and the correct estimated annual burden is "1,000 hours".

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.

VA uses the information collected to determine eligibility and payment for tutorial assistance. Without the information on this form, VA would be unable to determine the applicant's eligibility for tutorial assistance.

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.

Information technology is helping to reduce the burden. The electronic collection is made via an internet-based application called Veterans Online Application (VONAPP) that collects the same information as the printed VA Form 22-1990t. VONAPP allows applicants to submit information directly to the Regional Processing Office (RPO) with jurisdiction over the claim, reducing potential error and speeding the application process.

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.

Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or agency which maintains the necessary information, nor is it available from other sources within our Department.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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. 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 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. 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.

The collection of information does not require any special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication 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.

The Department notice was published in the Federal Register on October 2, 2014, Volume 79, Number 191, page 59563. No comments were received in response to this notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

VA does not provide any payment or gifts to respondents.

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.

VA Form 22-1990t is retained permanently 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, 2011 Compilation.

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.

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

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.

The estimated annual burden for the collection of the information is 1000 hours and covers one form only. We project that the average number of respondents will be 1000, with each respondent completing an average of 2 claims.

a. Number of Respondents: 1000; number of responses: 2000

b. Frequency of Response: 2 responses annually

c. Annual Burden Hours: 1000

d. Estimated Completion Time: 30 minutes

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$24,000; (1000 burden hours X \$24 per hour). The form is completed by the student, the tutor and a school professor. 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. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any record keeping costs.

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.

The annual cost to the U. S. Government for administering the forms is estimated at \$22,637 (\$8,590 + \$14,047). This estimate is based on 2000 responses annually. The cost is composed of the following:

- An initial processing cost of \$8,590 is based on processing time of 10 minutes per application in the Education Division using the salary of a GS 9/5 Claims Examiner (\$25.77 per hour X 2000 X .10/60).
- A secondary processing cost of \$14,047 is based on processing time of 20 minutes in the Finance Activity using the salary of a GS 7/5 Financial Analyst (\$21.07 per hour X 2000/ 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. Explain the reason for any burden hour changes since the last submission.

The burden hours increased due to the addition of chapter 1607. To correctly calculate the number of respondents, we assume that each payment represents a respondent and each respondent will submit two claims per year. We also assume that the amount of claims paid is the same for the education programs with unavailable data such as Chapter 32 and Chapter 35. Our system collects the total amount of actual tutorial

payments made for Chapter 30, 33, 1606, and 1607 annually. 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 and Chapter 35. 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. The expiration date placeholder has also been added to the form.

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.

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

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 expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.