

**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 monthly 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.

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.

We considered using the Veterans Online Application (VONAPP) and/or the Vets.gov websites to collect this information electronically but this method doesn't make sense because the form requires three independent signatures to verify tutorial sessions; that of the applicant, the School Certifying Official (SCO), and the professor. Instead, we adopted the Right Now Web electronic technology to allow the form to be printed, scanned to a PDF file and submitted.

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.

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

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

The information collection only involves individuals and has no impact on educational institutions or small businesses

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.

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines

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 November 21, 2017, Volume 82, No. 223, pages 55489-55490. 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.

No payments or gifts to respondents have been made under this collection of information.

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 mandated by the legal provisions in 38 U.S.C. 5701.

VA published a System of Records Notice (SORN) to the Federal Register on July 19, 2012, covering our System of Records for Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – for VA System of Records Number (58VA21/22/28). This information is contained in the Privacy Act Issuances, 2012 Compilation. The document's citation is 77 FR 42593, pages 42593-42615, document number 2012-17507.

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.

There are no questions 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 179 hours based on the total number of respondents of 1078. There was a total of 1047 respondents for chapters 30, 33, 1606 and 1607. There was a total of 31 respondents for chapters 32 and 35. The respondent data was used for FY 2013 through 2015. These amounts average to approximately **359** respondents per year.

a. Number of Respondents: 359

b. Frequency of Response: 2 responses annually

c. Annual Burden Hours: 359
(359 respondents x 2 responses per annually x 30 minutes per response / 60 minutes per hour)

d. Estimated Completion Time per response: 30 minutes

e. The respondent population consists of beneficiaries who are pursuing approved programs of education. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as educational background and wage potential of respondents. Therefore, VBA used general wage data for "All Occupations" 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. Accordingly, the mean hourly wage is \$24.34. The general wage code of "00-000-0000 for "All Occupations" may be found by clicking this link https://www.bls.gov/oes/2017/may/oes_nat.htm#00-0000.

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 \$4,356 (179 burden hours X \$24.34 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).

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 \$4,331 (\$1,644 + \$2,687). This estimate is based on 359 average responses annually. The cost is composed of the following:

- An initial processing cost of \$1,644 is based on processing time of 10 minutes per application in the Education Division using the salary of a GS 9/5 Claims Examiner (\$27.48 per hour X 359 X.10/60).
- A secondary processing cost of \$2,687 is based on processing time of 20 minutes in the Finance Activity using the salary of a GS 7/5 Financial Analyst (\$22.46 per hour X 359 X.20/60).

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
09	05	10	\$ 27.48		359	\$1,644
07	05	20	\$ 22.46		359	\$2,687
Overhead at 100% Salary						\$4,331
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						
Processing / Analyzing Costs						\$4,331
Printing and Production Cost						\$0
Total Cost to Government						\$4,331

Note: The hourly wage information above is based on the hourly '2018 General Schedule (Base) Pay <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>

This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of the grade level spend to process to completion a claim received on this form.

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.

There is a decrease in burden hours due to a decrease in the number of responses received for 2013 through 2015.

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.