

Supporting Statement – PART A

APPLICATION FOR INDIVIDUALIZED TUTORIAL ASSISTANCE

VA FORM 22-1990t

OMB CONTROL NUMBER 2900-0171

Summary of Changes from Previously Approved Collection

- Application for Individualized Tutorial Assistance.
- There are no changes to the form during this submission other than updating the respondent burden paragraph based on the newly received template format.
- No comments were received in response to the 60-Day FRN.
- The information collection is being submitted as a “Revision” due to the decrease in burden.

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, 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.

The 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 va.gov website to collect this information electronically but realized the idea doesn't make sense because the form requires three independent signatures as verification of the tutorial sessions: the applicant's, the School Certifying Official (SCO), and the professor's signature. Chapter 33 however, requires four signatures which also includes the signature of the Tutor. We therefore Instead, adopted the Oracle Client Application 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.

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

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

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

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.

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

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.

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, September 27, 2024. The 60-Day FRN citation is Volume 89, FRN 79366-79367.

A 30-Day Federal Register Notice (FRN) for the collection published on Monday, December 2, 2024. The 30-Day FRN citation is Volume 89, FRN 95359-95360.

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

No payments or gifts are being offered to respondents as an Incentive to participate in the collection.

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.

Our assurance of confidentiality is covered by 38 U.S.C. 5701 and our System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), which are contained in the Privacy Act Issuances, 2012 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.

No questions considered sensitive are being asked in this collection.

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

Estimation of Respondent Burden:

VA Form 22-10216

[Application for Individualized Tutorial Assistance].

There was a total of 308 collections of the “Application for Individualized Tutorial Assistance” instruments received for calendar years 2021, 2022 and 2023, resulting in an average annual receipt of 102 responses. The result calculates to a total of 51 burden hours.

- a. Number of Respondents: 102.
- b. Frequency of Response: Once annually.
- c. Annual Burden Hours: 51 (102 X 30 minutes / 60 minutes).
- d. Estimated Completion Time: 30 minutes.
- e. The respondent population for VA Form 22-1990t consists of beneficiaries who are eligible and pursuing approved programs of education and who need tutorial assistance. 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. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers is \$1,259.20. Assuming a forty (40) hour work

week, the median hourly wage is \$31.48 based on the BLS wage code of "00-000-0000 for "All Occupations." This information was taken from the following website https://www.bls.gov/oes/current/oes_nat.htm., May 2023.

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 \$1,605.48 (51 burden hours X \$31.48 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).

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

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.

Estimated Labor Cost to the Federal Government: \$1,660.56.

[Application for Individualized Tutorial Assistance, VA Form 22-1990t].

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Number of Responses	Total
GS-09	05	30 min	\$32.56	\$16.28	102	\$1,660.56 (102 X \$32.56 X 30min / 60min)
Overhead at 100% Salary						\$1,660.56.
Overhead charges are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						\$1,660.56.
Processing / Analyzing Charges						\$1,660.56.
Printing and Production Cost						\$ 0.00
Total Cost to Government						\$1,660.56.

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx.

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.

15. Explain the reason for any burden hour changes since the last submission.

The burden has significantly decreased based on the number of decreased data instruments received for calendar years 2021, 2022 and 2023. There was only an average of 51 tutorial requests received for these periods. This information collection request is being submitted as a Revision.

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.

The results of this information collection will not be published.

17. If seeking approval to not display 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 display of the expiration date of the OMB approval on the collection instrument.

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

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.