

**SUPPORTING STATEMENT FOR VA FORM 40-0247
PMC INSERT**

A. Justification

1. Since the automation of the presidential Memorial Certificate (PMC) Program in 1991, the PMC insert has become an integral part of this program and accompanies the original PMC. The PMC insert is provided for the convenience of certificate recipients.

The PMC program itself was initiated in March 1962 by President John F. Kennedy to honor the memory of honorably discharged, deceased veterans, and has been continued by all subsequent Presidents. Statutory authority for the program is Section 112, Title 38, of the United States Code.

The National Cemetery Administration (NCA) is asking for a three-year approval for this Information collection. The NCA expects this program to have full presidential support.

2. The purpose of the PMC Insert is to allow an eligible recipient, which includes the next of kin, other relatives or friends, i.e., surviving spouses, sons, daughters, grandchildren, and so forth, to request additional certificates and/or replacements or corrected certificates upon receipt of the original PMC. Replacements are requested due to PMCs being bent, water soaked, or otherwise damaged during mail handling; corrected PMCs are requested due to an incorrect name of the deceased veteran. The PMC itself is a gold foil-embossed certificate containing the Great Seal of the United States and bearing the President's signature. It is mailed to relatives and friends of the deceased, honorably discharged veterans honoring their military service to our Nation. In most cases involving recent deaths, the local VA Regional Office originates the application process without a request from the next of kin as part of processing death benefits claims.

The PMC insert is not self initiated by the general public/eligible recipients. There is no form or application that is used to initiate an original request. Original requests are normally in the form of letters and/or telephone calls from eligible recipients (for example widows, sons, and so forth).

The PMC is automatically initiated for those eligible veterans buried in VA national cemeteries.

3. The present collection of information is effective; consideration for modification is unwarranted at this time.

4. Duplication does not exist. A request for additional PMCs is a unique circumstance unassociated with any other available information.

5. Neither small business nor other small entities are involved; this is a personal matter instituted by a next-of-kin of an eligible veteran.

6. Requests for additional PMCs are generally made by the next-of-kin of an eligible deceased veteran. Frequency of such requests cannot be regulated.

7. There are no special circumstances requiring that the collection be conducted in a manner inconsistent with the guidelines in 5 CFR Section 1320.6.

8. Attached is a copy of page numbers 64338-64339 from the Federal Register of November 1, 2006, Volume 71, Number 211, soliciting comments on the information collection. No comments were received during the 60-day Federal Register Notice.

Collection of data is consistent with guidelines in 5 CFR 1320.8(d). The only public contact made is with the next-of-kin that is requesting additional PMCs. Other public contact is unnecessary. Data collected is done solely by NCA to make it more convenient for the persons requesting additional PMCs.

9. There are no payments or gifts given to respondents.

10. No privacy information is being collected.

11. Information given by the requester is not of a sensitive or personal nature. The information is provided voluntarily so that the next of kin may receive additional PMCs. The questions are basic, for example the name and address of recipient and the number of additional PMCs desired are requested. Requests are made at the volition of the requester.

12. In FY 2006, 240,132 respondents requested additional PMCs for an annual burden of 8,004 hours. The average to complete the PMC Insert is two minutes. Only one form is used, and there is no burden variance for respondents. Estimating \$15.00 per hour for the time the respondents use to complete the PMC Insert, the estimated costs to the respondent is \$3,602,980.

13. Annual cost burdens are covered in Paragraphs 12 and 14. There are no capital or start-up costs. There are no operational or maintenance costs, and no costs associated with the purchase of service equipment.

14. Burden relates to the number of requests for additional PMCs. The burden, therefore, is unpredictable. Since requests fluctuate, the exact amount of requests and the annual amount of requests are unpredictable. Annual cost and burden depends on the number of PMC inserts returned.

15. There were 240,132 requests for additional PMCs made in FY 2006. The significant increase for FY 2006 is attributed to an administrative error in previous calculations. Our annualized estimated cost to the Government is as follows:

Administrative Cost

One minute to review and enter recipient desires into a database
(\$63,320{GS11/6}) divided by 2087 = \$30.34 per hour cost.
Burden hours = 240,132 X one minute = 240,132 minutes divided by 60 = 4002
hours.
Burden Cost = 4002 hours X \$30.34 = \$121,420.68

Printing Cost

Printing cost of 240,132 PMC Inserts = \$4802.64

Total Cost to the Federal Government = \$126,223.32

16. Requests for additional PMCs are unpredictable; it would be absolute speculation to indicate the reasons for an increase or decrease.

17. The results from the information collection is not for publication or used as a statistical report.

18. This submission does not contain any exceptions to the certification statement identified in OMB 83-I, item 19, Certification of Paperwork Reduction Act Submission.

19. We are requesting an exception not to display the expiration date.

B. This collection of information does not employ statistical methods.