Supporting Statement for VA Form 21-530A State Application for Interment Allowance under 38 USC Chapter 23 (2900-0565)

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. Information is requested by this form under the authority of 38 U.S.C. 2302 and 2303.

2. VA Form 21-530a is used to gather information that is necessary to determine whether a State is eligible for interment allowances for eligible veterans who have been buried in a State Veteran's cemetery. Without this information, VA would be unable to properly determine eligibility and pay benefits. This form solicits information necessary to determine eligibility to burial benefits.

3. VA Form 21-530a is available on the VBA website for downloading by claimants. State Veteran's cemetaries may print and submit applications non-electronically. Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database. VA Form 21-530a is not available in VONAPP.

4. 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. Since the collection of information involves funeral businesses, specific instructions have been provided in reference to the statement of accounts required to accompany the claims.

6. The VA compensation and pension programs require current information to determine eligibility for benefits. Without the information provided on this form, it would not be possible to obtain the information needed to make a determination and reimburse a claimant.

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

8. The Department notice was published in the Federal Register on November 19, 2008, page 69722. No comments were received in response to this notice.

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

10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22, "Compensation, Pension, Education and Rehabilitation Records - VA" as set forth in Privacy Act Issuances, 1993 compilation found in 42 Fed. Reg. 49726 (9/27//1977).

- 11. There are no questions of a sensitive nature.
- 12. Estimate of Information Collection Burden.
- a. Number of Respondents is estimated at 3,100 per year.
- b. Frequency of Response is on occasion for most beneficiaries.
- c. Annual burden is 1,550 hours.

d. The estimated completion time of 30 minutes is based on review by staff personnel and previous usage of this form.

- e. The total estimated cost to respondents is \$23,250 (1,550 hours x \$15 per hour).
- 13. This submission does not involve any recordkeeping costs.
- 14. Estimated Costs to the Federal Government:

\$86,025
\$420
\$86,445

15. There is no change in the reporting burden.

16. The information collection is not for publication or tabulation use.

17. The collection instrument, VA Form 21-530a, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this form. This form is submitted to OMB every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collecting, processing and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 21-530a.

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

B. <u>Collection of Information Employing</u> Statistical Methods

The data collection does not employ statistical methods.