

SUPPORTING STATEMENT
VA FORM 29-586
CERTIFICATION OF CHANGE OR
CORRECTION OF NAME
2900- 0679

1. The form is used by the insured as a certification of change or correction of name. The information on the form is required by law, USC 1904 and 1942.

2. The information collected on the form is used by the Insurance Activity to initiate the processing of the insured's request to change his/her name.

Per OMB's terms of clearance "VA shall assess the practicality of requiring individual respondents to provide full social security numbers on submitted forms." Department of Veterans Affairs (DVA) is currently reviewing the use of Social Security Number (SSN) and its use as a primary identifier. This applies to both new applications as well as legacy systems. Efforts are underway to develop a new veteran identifier that will be used to replace the SSN. This is a joint effort with all administrations within in DVA as well as DoD and will be an integral part of the President's vision for a single veteran record. VA still requires the use of SSN where a compelling need exists.

3. VA Form 29-586 will be available on the One-VA web site in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of this form.

4. The information is not contained in any other VA records. Similar information is not available elsewhere.

5. The information does not involve any small businesses.

6. The form is designed for use by the Insurance Activity to initiate the processing of the insured's request to change his/her name.

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

8. The Department notice was published in the Federal Register on December 15, 2008, Volume 73, Number 241, pages 76099-76100. There were no comments received.

9. The information collected is supplied by the respondent. No remuneration is made.

10. The information collection conforms with the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein. The records are maintained in the system identified as 36VA00, "Veterans and Armed Forces Personnel United States Government Life Insurance Records - VA" as contained in the Privacy Act Issuances, 1993 Compilation.

11. There are no questions of a sensitive nature.

12. We estimate that approximately 120 forms a year will be received. We also estimate that it will take approximately 10 minutes to complete this form. We arrived at this estimate by initiating a trial with a VA staff member unfamiliar with the form. The annual burden is 20 hours.

13. This submission does not involve any record keeping costs.

14. Cost to Government:

\$63.00	Estimated mailing cost (120 X 2 minutes per form X \$7.45/hour (average salary for station mail personnel) plus 120 X 27.9 cents each (presort discount)).
\$32.00	Estimated cost for collections (120 X 2 minutes per X \$7.91/hour (average salary of station collections personnel)).
\$1,094.00	Estimated cost for processing (120 forms X 45 minutes per form X \$12.15/hour (average salary for reviewers)).
\$15.00	Estimated printing costs (1,000 X \$15/1,000 forms).
\$1,204.00	Total cost to the Government.
\$300.00	Cost to reporting public (20 hours X \$15/hour)

15. There is no change in burden.

16. The information is collected for insurance purposes only and there are no plans for publication.

17. The collection instrument, VA Form 29-586, may be reproduced and/or stocked by the respondents and veteran service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stock of this form. This form is submitted to OMB for approval every three 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 this VA Form.

18. There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I.

B. Statistical Methods

The data collection does not employ statistical methods.