

SUPPORTING STATEMENT FOR VA FORMS 24-0296, 24-0296A, B, C, D, E  
DIRECT DEPOSIT ENROLLMENT

(2900-0564)

A. Justification

1. On April 26, 1996, the President signed into law the Debt Collection Improvement Act of 1996 (DCIA). This legislation requires the use of electronic funds transfer (EFT) for most Federal payments starting January 2, 1999. Regulatory authority contained in 31 C.F.R. 208 and 210.4 provides the Secretary, Department of Veterans Affairs (VA) the right to authorize the appropriate disbursing officer to issue recurring benefit payments electronically to a financial institution for credit to an account designated by a VA benefit recipient. VA Forms 24-0296, 24-0296A, 24-0296B, 24-0296C, 24-0296D and 24-0296E are the forms used to gather the information required to enroll VA benefit recipients in the electronic funds transfer (EFT) program. The 24-0296 is designed for EFT enrollment in domestic banks. VA forms 24-0296A, B, C, D and E are used for international banks.
2. The requested information will be used by VA to direct payment data to financial institutions for deposit into accounts designated by the benefit recipients.
3. The forms are currently available on the VA website in electronic fillable format with data field intelligence. The forms may also be printed and downloaded. Improved information technology cannot be used for this collection of information since the forms must be collected directly from benefit recipients.
4. Program reviews were conducted to identify areas of duplication; however, none were found to exist.
5. Only benefit recipients use the forms; therefore, the collection of information does not impact small businesses or entities.
6. EFT is a Department of Treasury initiative that provides the safe and timely delivery of payments to Federal benefits recipients. The inability to collect the information would adversely impact the agency's ability enroll benefit recipients in the DD/EFT program. The reduced number of enrollees will reduce the overall savings to the Federal government.
7. There are no special circumstances requiring collection in a manner inconsistent with the guidelines in 5 CFR 1320.6.
8. The Department's notice was published in the Federal Register dated March 30, 2009 on pages 14190-14191. There were no comments received in response to this notice.
9. There will be no payments or gifts to respondents.

10. We are complying with the provisions of 38 U. S. C.5701 and the Privacy Act of 1974, and 5 U. S. C. 522a. The records are maintained in the appropriate Privacy System of Records identified as "Compensation, Pension, Education and Rehabilitation Records- VA (58VA21/22)" contained in the Privacy Act Issuances, 1993 Compilation.

11. The following sensitive information is requested on all forms: VA File Number, Payee's SSN, Bank Account number. The SSN and/or claim number serves to identify the enrollee and to confirm his/her entitlement to benefit payments. The bank information is needed to ensure funds are delivered to the proper financial institution and deposited into the proper account. Without this information, we could not process the EFT enrollment requests. The Debt Collection Act of 1996 requires the collection of this information. This law, which was signed into law on April 26, 1996, requires all Federal payments to be issued electronically beginning January 1, 1999.

12. The estimated hour burden is shown below:

Forms	Number of Respondents	Response Time	Respondent Burden
24-0296	3,000	15 minutes	750 hours
24-0296A, B, C, D, E	2,000	15 minutes	500 hours
Totals	5,000	15 minutes	1,250 hours

The frequency of responses is based on the need for benefit recipients to change banking information.

Estimated Cost to the Public is \$18, 750.00 (\$15 x 1,250).

13. This submission does not involve any recordkeeping costs.

14. There is no cost to the Federal Government.

15. There is no change in burden.

16. The collected information is not for publication.

17. The collection instruments may be reproduced and/or stocked by the agency, the respondents, or Veterans Service Organizations (VSOs). Because an expired form is not acceptable, an expiration date on the form could cause a delay in processing a respondent's request to enroll in the EFT program. Placing an expiration date on the form could also possibly result in the destruction of thousands forms in stock.

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

B. Employing Statistical Methods.

The data collection does not employ statistical methods.