

SUPPORTING STATEMENT FOR
SGLV 8600, SERVICEMEMBER'S GROUP LIFE INSURANCE
TRAUMATIC INJURY PROTECTION PROGRAM APPLICATION FOR TSGLI BENEFITS
38 CFR 9.20 UNDER
SERVICEMEMBERS' GROUP LIFE INSURANCE (SGLI)
2900-0671

JUSTIFICATION:

1. Section 1032 of the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Tsunami Relief, 2005, (Public Law 109-13) added automatic traumatic injury protection coverage (aka TSGLI rider) to the Servicemembers' Group Life Insurance (SGLI) program. TSGLI provides an automatic insurance benefit for any SGLI insured who sustains a traumatic injury that results in a loss, such as a loss of limb, as prescribed by the Secretary of Veterans Affairs in collaboration with the Secretary of Defense. Section 1032(d) of Public Law 109-13 requires that TSGLI claims procedure be in place no later than December 1, 2005, so that the insurer can begin paying TSGLI claims on that date. The application facilitates the payment of TSGLI benefits as required by Congress.
2. VA regulations for the Servicemembers' Group Life Insurance (SGLI) program was amended to include the Traumatic Injury Protection (TSGLI) that permit service members who are insured under SGLI and suffer a loss from a traumatic injury eligible to receive monetary compensation for a total amount not less than \$25,000 and not greater than \$100,000. TSGLI was designed by Congress to provide severely injured service members who suffer a loss as a direct result of a traumatic injury, such as a loss of an arm or leg, with monetary assistance to help the member and the member's family through an often long and arduous rehabilitation period.
3. The use of automated collection techniques is not anticipated. The form is fillable on-line, however, it must then be printed and submitted to the branch of service with a signature.
4. There is no duplication associated with this collection of information.
5. The impact on small businesses and other small entities is minimized by using "standard" or data routinely maintained by physicians. The collection of information has been thoroughly analyzed to ensure that all requested data is essential.
6. If this collection of information is not conducted or is conducted less frequently, the insured would be unable to collect this benefit.
7. The collection of information does not require any special circumstance.
8. The public comments were requested through the Department's Federal Register notice that was published on March 30, 2009, page 14192. There were no comments in response to this notice.

9. No payments or gifts are provided to respondents.
10. The information collection conforms to 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, Volume II.
11. There are no questions of a sensitive nature.
12. Estimated Annual Information Collection Burden

a. Number of estimated annual respondents	1,500
b. Frequency of response	One-time
c. Burden hours	1,125
d. Total estimated cost to respondent is \$16,875, based on 1,125 hours x \$15 per hour.	
13. This submission does not involve any recordkeeping costs.
14. There is no estimated cost to the Federal Government
15. There is no program changes or adjustments in burden.
16. There are no plans to publish the results of this information collection.
17. This collection of information complies with the requirements of 5 CFR 1320.8(b)(3) except as follows. The rule does not contain in its text the estimated burden of the collection of information. The rule states the nature of the information to be collected, but it does not state the confidentiality of that information. VA requests an exemption from providing the above information as part of the regulation. To publish as part of the regulation all information required by 5 CFR 1320.8(b)(3) would mean that each time the information required by the rule changed, for example, a change in one of the reports to be kept, the rule would have to go through the regulatory process again even though the purpose of the rule would be unchanged. This is contrary to the purpose of the Code of Federal Regulations. Secondly, to put all information in the regulation would make the rule unnecessarily long. This is contrary to the President's goal, expressed in Section 1(b)(12) of Executive Order 12866 that regulations be simple.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this collection of information.