

**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 each original PMC. The PMC insert is provided for the convenience of certificate recipients.

The PMC program was initiated in March 1962 by President John F. Kennedy to honor the memory of honorably discharged, deceased veterans and members of the Armed Forces of the United States, and has been continued by all subsequent Presidents since that date. 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 extension for the use of this Insert so that all PMC's issued will continue to have this form included with their certificate.

2. The purpose of the PMC Insert is to allow a recipient (which can or may include the next of kin, other relatives or friends, i.e., surviving spouses, sons, daughters, grandchildren) to request additional certificates and/or replacements or corrected certificates upon receipt of the original PMC.

Replacements are primarily requested due to damage (PMCs being bent, water soaked, or otherwise damaged during mail handling). Corrected PMCs are requested due to a spelling error in the veteran's name.

The PMC itself is parchment paper document which contains a gold foil-embossed replica of the Great Seal of the United States and bears an authorized replication of the sitting President's signature. It is mailed to relatives and friends of the deceased, honorably discharged veterans honoring their military service to our Nation.

PMCs are automatically generated and sent to families and loved ones when a death benefit claim is processed, when a flag application is processed, when the veteran is buried in a State Veterans Cemetery, Department of Interior Cemetery, National Parks Cemetery, VA National Cemetery or at Arlington National Cemetery. Most all of these cases involve a recent or contemporary death and do not immediately involve the next of kin as part of claim process. PMC requests are also received directly from the general public through the use of an application or claim form and are regularly received via US Mail or via a toll free fax line service. Requests are also received in the form of letters or e-mails and are most often from eligible recipients or their authorized representatives.

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 or corrected PMCs is a unique circumstance unassociated with any other available information.
5. Small business and/or the authorized representative of the family may be involved in the request process however generally this is a personal matter instituted by a next-of-kin of an eligible veteran.
6. Requests for additional PMCs are primarily made by the next-of-kin of an eligible deceased veteran. Frequency of such requests cannot be regulated or projected.
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. The Federal Register notice soliciting comments was published on November 13, 2009 at page 58684. No comments were received in response to this 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 FY2009, 316,346 respondents requested additional PMCs from the PMC Program directly and through VBA offices directly or an annual burden of 10,545 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 \$158,175.00.
13. 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. 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 = 316,346 X one minute = 316,346 minutes divided by 60 = 5,272.5
hours = \$159,968.00.

Printing Cost

Printing cost of 316,346 PMC Inserts = \$6,327.39

Total Cost to the Federal Government = \$166,295.39.

15. The burden hour increased due the number of respondents requesting additional Presidential Memorial Certificate.

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

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

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.

B. Statistical Methods

This collection of information does not employ statistical methods.