

SUPPORTING STATEMENT
VA FORMS 29-0188 and 29-0189,
APPLICATION FOR SUPPLEMENTAL SERVICE
DISABLED VETERANS INSURANCE
2900-0539

JUSTIFICATION:

1. These forms are used by eligible insured to apply for Supplemental Service Disabled Veterans Insurance. Collection of the requested information is required to implement the provisions of Public Law 102-568 which expanded the insurance coverage available under 38 USC Section 1922.
2. The information collected on these forms is used by the Department of Veterans Affairs (VA) to establish the insured eligibility for coverage under the Supplemental Service Disabled Veterans Insurance program. The forms have been updated due to a law change to reflect the insurance amount being increased from \$20,000 to \$30,000.
3. VA Forms 29-0188 and 29-0189 are available on the One-VA web site in a fillable electronic format. VBA is currently hosting these forms on a secure server and does not currently have the technology in place to allow for the complete submission of the forms. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the forms to be incorporated with an existing centralized legacy database.
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 forms are designed for use by VA to determine the insured's eligibility for insurance coverage.
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 August 24, 2010 at page 52066. There were no comments in response to this notice.

9. The information collected is supplied by the respondent. No remuneration is made.
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.
11. There are no questions of a sensitive nature.
12. We estimate that approximately 10,000 forms a year will be received. We also estimate that it will take approximately 20 minutes to complete these forms. We arrived at this estimate by initiating a trial with a VA staff member unfamiliar with the forms. The annual burden is 3,333 hours. Cost to reporting public (3,333 hours X \$15/hour) equals \$49,995.00.
13. This submission does not involve any record keeping costs.
14. Cost to Government:
- | | |
|-------------|---|
| \$8,990.00 | Estimated mailing cost (10,000 X 2 minutes per form X \$15.51/hour (average salary for station mail personnel) plus 10,000 X 38.2 cents each (presort discount)). |
| \$4,660.00 | Estimated cost for collections (10,000 X 2 minutes per X \$13.98/hour (average salary of station collections personnel)). |
| \$66,100.00 | Estimated cost for processing (10,000 forms X 20 minutes per form X \$19.83/hour (average salary for reviewers)). |
| \$150.00 | Estimated printing costs (10,000 X \$15/1,000 forms). |
| \$79,900.00 | Total cost to the Government. |
15. There is no change in respondent burden even though VA Form 29-0190 has been discontinued due to the fact that VA Form 29-0188 and VA Form 29-0189 are used in its place.
16. The information is collected for insurance purposes only and there are no plans for publication.

17. The collection instruments, VA Forms 29-0188 and 29-0189, may be reproduced and/or stocked by the respondents and veteran service organizations. These VA forms do not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of these forms. These forms are 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 these VA forms.

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

Statistical Methods

The Veterans Benefits Administration does not collect information employing statistical methods.