

SUPPORTING STATEMENT  
VA FORM 29-352 and VA FORM 29-353  
APPLICATION FOR REINSTATEMENT  
2900-0011

JUSTIFICATION:

1. These forms are used by the Department of Veterans Affairs (VA) to determine the insured's eligibility to reinstate his/her plan of insurance and/or Total Disability Income Provision. The information on this form is required by 38 CFR Sections 6.79 and 8.22.
2. The information collected on these forms is used by Department of Veterans Affairs (VA) to establish eligibility of the applicant for the purpose of reinstatement.
3. VA Forms 29-352 and 29-353 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 form 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. These forms are designed for use by the insured to establish his/her eligibility to reinstate insurance and/or Total Disability Income Provision.
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, pages 52066-52067. There were no comments received 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 1,500 VA Form 29-352's and 1,500 VA Form 29-353's a year will be received. We also estimate that it will take approximately 30 minutes to complete VA Form 29-352 and 15 minutes to complete VA Form 29-353. We arrived at this estimate by initiating a trial with a VA staff member unfamiliar with the forms. The annual burden is 750 hours for VA Form 29-352 and 375 hours for VA Form 29-353. The estimated cost for both collections is \$15.00/hour x 1,125 hours=\$16,875.

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

14. Cost to Government for VA Form 29-352:

\$1,349.00	Estimated mailing cost (1,500 X 2 minutes per form X \$15.51/hour (average salary for station mail personnel) plus 1,500 X 38.2 cents each (presort discount)).
\$7,436.00	Estimated cost for processing (1,500 forms X 15 minutes per form X \$19.83/hour (average salary for reviewers)).
\$45.00	Estimated printing costs (1,500 X \$30/1,000 forms).
\$9,529.00	Total cost to the Government.

Cost to Government for VA Form 29-353:

\$1,349.00	Estimated mailing cost (1,500 X 2 minutes per form X \$15.51/hour (average salary for station mail personnel) plus 1,500 X 38.2 cents each (presort discount)).
\$699.00	Estimated cost for collections (1,500 X 2 minutes per X \$13.98/hour (average salary of station collections personnel)).
\$7,436.00	Estimated cost for processing (1,500 forms X 15 minutes per form X \$19.83/hour (average salary for reviewers)).
\$45.00	Estimated printing costs (1,500 X \$30/1,000 forms).
\$9,529.00	Total cost to the Government.

15. The increase in respondent burden is due to miscalculating the time it took to complete VA Form 29-352.

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

17. The collection instruments, VA Form 29-352 and VA Form 29-353, 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 stock 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.