

Supporting Statement for VA Form 20-0344
Annual Certification of Veteran Status and Veteran-Relatives
2900-0654

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. VA has a responsibility to protect benefit records to insure the security, integrity, and confidentiality of these records. (5 U.S.C. 552a (e) (10)). VBA employees, non-VBA employees in VBA space and Veteran Service Organization (VSO) employees who have access to benefit records are required to annually report veteran status of themselves and any veteran relatives. Based on this information, additional security measures are applied to identified benefit records in order to control access to these records and limit the potential for fraud.
2. VA Form 20-0344 is completed by VBA employees, non-VBA employees in VBA space and Veteran Service Organization (VSO) employees who have access to benefit records. These individuals are required to provide personal identifying information for themselves and any veteran relatives, so VA is able to identify and properly protect these benefit records.
3. VA Form 20-0344 is available on the One-VA web site in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. 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. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department.
5. The collection of information does not involve small businesses or entities.
6. The information is necessary to insure that benefit records of employees and employees' relatives are properly maintained in accordance with VA policy. Without the information provided on this form, VA would be unable to determine which benefit records require special handling to guard against fraud, conflict of interest, improper influence etc. by VA and non-VA employees.

7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

8. The Department notice was published in the Federal Register on October 6, 2010 at pages 61858. No comments were received in response to this notice.

9. No payments or gifts to respondents have been made under this collection of information.

10. The records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Rehabilitation Records—VA (58VA21/22/28)" as set forth in Privacy Act Issuances, 1993 compilation found in 74 Fed. Reg. 117 (June 19, 2009).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 14,000 per year.

b. Frequency of Response is once a year.

c. Annual burden is 5,834 hours.

d. The estimated completion time of 25 minutes is based on review by staff personnel.

e. The total estimated cost to respondents is \$87,510 (5,834 hours x \$15/hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$122,351

(GS-12/5 @ \$40.66 x 14,000 x 6/60 minutes = \$56,924)

(GS-9/5 @ \$28.04 x 14,000 x 10/60 minutes = \$65,427)

b. Printing and production cost \$284

c. Total cost to government \$122,635

15. There is no change in the reporting burden.

16. The information collection is not for publication or tabulation use.

17. The collection instrument, VA Form 20-0344, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this form. This form will be submitted to OMB every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action. 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 seeks an exemption that waives the displaying of the expiration date on VA Form 20-0344.

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

B. Collection of Information Employing Statistical Methods

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