

SUPPORTING STATEMENT  
VA FORMS 29-8700, 29-8700a, 29-8700b, 29-8700c, 29-8700d, 29-8700e  
VA FORMS 29-8701, 29-8701a, 29-8701b, 29-8701c, 29-8701d, 29-8701e  
VA FORMS 29-8485 & 29-8485a  
APPLICATIONS FOR ORDINARY LIFE INSURANCE AGE 65 & 70  
2900-0166

JUSTIFICATION:

1. These forms are used by the policyholder to apply for replacement insurance for Modified Life Reduced at Age 65 and 70. The information is required by law, 38 U.S.C. Section 1904.
2. The information collected on the forms are used by the Department of Veterans Affairs (VA) to initiate the granting of coverage for which applied.
3. VA Forms 29-8700 a-e and 29-8701 a-e are on the Xerox 9700. VA Forms 29-8485 and 29-8485a are 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 this 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. 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 the insurance activity to determine the insured's eligibility for the insurance. The collection is generally conducted only once.
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 Department notice was published in the Federal Register on May 2, 2011, on pages 24572-24573. 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 with 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 15,400 forms a year will be received with a burden hour of 1,284. We also estimate that it will take approximately 5 minutes each to complete VA Forms 29-8700, 29-8700a, 29-8700b, 29-8700c, 29-8700d, 29-8700e, 29-8701, 29-8701a, 29-8701b, 29-8701c, 29-8701d, 29-8701e, 29-8485 and 29-8485a. We arrived at this estimate by initiating a trial with a VA staff member unfamiliar with the form. The cost to reporting public is 1,284 hours X \$15/hour = \$19,245.

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

14. Cost to Government:

\$13,845.00	Estimated mailing cost (15,400 X 2 minutes per form X \$15.51/hour (average salary for station mail personnel) plus 15,400 forms X 38.2 cents each (presort discount)).
\$14,353.00	Estimated cost for collections (15,400 X 4 minutes per form X \$13.98/hour (average salary of station collections personnel)).
\$25,449.00	Estimated cost for processing (15,400 forms X 5 minutes per form X \$19.83/hour (Average salary for reviewers)).
\$30.00	Estimated printing costs (1,000 X \$30/1,000 forms).
\$53,677.00	Total cost to the Government.

15. There have not been any program changes or adjustments

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

17. The collection instruments, VA Forms 29-8700, 29-8700a, 29-8700b, 29-8700c, 29-8700d, 29-8700e, 29-8701, 29-8701a, 29-8701b, 29-8701c, 29-8701d, 29-8701e, 29-8485 and 29-8485a 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.