

Supporting Statement for VA Form 27-2008  
Application for United States Flag for Burial Purposes  
(2900-0013)

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. A U.S. flag may be provided to the next-of-kin or friend of a deceased veteran who served honorably in the U. S. armed forces to drape the casket or accompany the urn. Information is requested by this form under the authority of 38 U.S.C. 2301. Regulatory authority is found in 38 CFR 1.10.
2. VA Form 27-2008 is used for the sole purpose of gathering the necessary information to determine eligibility for issuance of a burial flag to the next-of-kin or friend of a deceased veteran.
3. VA Form 27-2008 is available on the One-VA web site in a fillable electronic format. VBA is currently hosting the 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 forms to be incorporated with an existing centralized legacy database. Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. However, VA Form 27-2008 is not one of the forms currently scheduled to be added to VONAPP due to limited resources. The Department will reconsider adding this form to VONAPP when the resources become available.
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. VA compensation and pension programs require claimants to file an application for benefits subsequent to the death of the veteran to determine eligibility for the benefit. Collection of this information is conducted at the time the next-of-kin or friend of a deceased veteran requests a burial flag. Without the information collected by VA Form 27-2008, entitlement to the benefit could not be determined.
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 3, 2011, page 61148. Regional office staff members record complaints and data for an ongoing form improvement program. VA received one general comment regarding a veteran's right to a burial flag. The respondent commented that "to remove the one thing that says 'we are a grateful nation for your service' and not provide the veteran with a burial flag is or would be unspeakable." Completion of VA Form 27-2008, *Application for United States Flag for Burial Purposes*, does not remove a Veteran's entitlement to a burial flag. VA uses this form to determine eligibility for issuance of a burial flag to a family member or friend of a deceased veteran. Upon completion of the form, one flag may be issued for each deceased veteran.

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 58VA21/22/28, "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA" 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 650,000 per year.

b. Frequency of Response is one time for most beneficiaries.

c. Annual burden is 162,500 hours.

d. The estimated completion time of 15 minutes is based on review by staff personnel and previous usage of this form.

e. The total estimated cost to respondents is \$2,437,500 (162,500 x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$6,012,500

(GS-5/5 @ \$18.50 x 650,000 x 30/60 minutes = \$6,012,500)

b. Printing and production cost \$22,500

c. Total cost to government \$6,035,000

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 27-2008, 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 is 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 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 VA Form 27-2008.

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.