

SUPPORTING STATEMENT
VA FORM 29-1546
APPLICATION FOR CASH SURRENDER OR POLICY LOAN
2900-0012

JUSTIFICATION:

1. This form is used by the insured to apply for cash surrender value or policy loan on his/her insurance. The information on this form is required by law, 38 USC 1906 and 1944, 38 CFR 6.115, 6.116, 6.117, 8.27, 6.100, 6.101 and 8.28.
2. The data collected on this form is used by the Department of Veterans Affairs (VA) to indicate the processing of the insured's request for a loan or cash surrender.
3. VA Form 29-1546 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. 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 form is designed for use by the insured to establish his/her eligibility to obtain a loan or cash surrender.
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 March 26, 2013, Volume 78 , Number 58, page 18426. Outside consultations were not solicited as no major changes are being made to this form. Field stations have not reported any difficulty on the part of respondents in using VA Form 29-1546. No comments were received because of this form being published in the Federal Register.
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 29,636 forms a year will be received. We also estimate that it will take approximately 10 minutes to complete this form. We arrived at this estimate by initiating a trial with a VA staff member unfamiliar with this form. The annual burden will now be 4,939 hours.

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

14. Cost to Government:

\$26,643.00	Estimated mailing cost (29,636 X 2 minutes per form X \$15.51/hour (average salary for station mail personnel) plus 29,636 X 38.2 cents each (presort discount)).
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\$13,810.00	Estimated cost for collections (29,636 X 2 minutes per X \$13.98/hour (average salary of station collections personnel)).
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\$97,947.00	Estimated cost for processing (29,636 forms X 10 minutes per form X \$19.83/hour (average salary for reviewers)).
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\$900.00	Estimated printing costs (30,000 X \$30/1,000 forms).
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\$139,300.00	Total cost to the Government.
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\$74,085.00	Cost to reporting public (4,939 hours X \$15/hour)
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15. There is no change in respondent burden.

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

17. The collection instrument, VA Form 29-1546, may be reproduced and/or stocked by the respondents and veteran service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stock of this form. This form is 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 this VA Form.

18. There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I. The Veterans Benefits Administration does not collect information employing statistical methods.