

**SUPPORTING STATEMENT FOR
GRAVESITE RESERVATION QUESTIONNAIRE (2-YEAR)
(2900-0546)**

A. Justification

1. From the late 1940's until January 1962, the Department of the Army allowed active duty servicepersons and surviving spouses of deceased veterans interred in national cemeteries to reserve gravesites for their interments. Recurring gravesite reservation contact are necessary as some reservees become ineligible, are buried elsewhere, or cancel their reservations; therefore, reserved gravesites would exist forever without use. VA FL 40-40 is used for this program to ensure that veterans upon their death would have space for themselves and eligible family members in national cemeteries. In 2014, the 30 day FRN for this collection was submitted as an extension. However, since that time OMB requested a revision to the form to add an expiration date placeholder, thus the revision. In addition, the thirty day notice was published with an incorrect title. The correct title is Gravesite Reservation Questionnaire and will be corrected and reflected in another Federal Register Notice.

Moreover, in 1982, the Adjacent Gravesite Set-Aside Program (AGS) was established, which allowed cemeteries to administer gravesite set-asides at cemeteries where 4'x 8' single-depth interments are authorized. This program permitted an adjacent gravesite to be set-aside at the time of the first interment of a veteran's family for future use. The original AGS Program was abandoned in 1986, when the then National Cemetery System discontinued the usage of 4' x 8' gravesites for initial burials.

However, on October 12, 1994, the AGS Program was reopened for married couples that are both veterans, allowing the establishment of an adjacent gravesite reservation at the time of burial of a veteran spouse upon the request of the surviving veteran spouse. This expands the potential for AGS reservations from the original 13 national cemeteries to all open national cemeteries. VA honors all gravesite set-asides established since the inception of the AGS Program in 1982.

An automated Adjacent Gravesite Set-Aside System (AGSS) was developed and managed by the staff at Philadelphia National Cemetery Area Office (NCAO), now Philadelphia Memorial Service Network. They formulated a database to record the names of the holders and pertinent information about the particular adjacent gravesite set-aside (AGS) that they gained through annual questionnaire. Philadelphia NCAO managed their database until recently.

In August 1997, the AGS Program was transferred to the Austin Automated Center (AAC). Computer-generated form letters were sent from the AAC to AGS holders biennially via FL 40-40 to ascertain their wish to retain their set-aside, or their wish to relinquish it. If a holder cancels his/her set-aside or becomes ineligible, the gravesite set-aside is then relinquished, and will be used for another eligible veteran and/or dependent. The biennial questionnaire in which AGS holders provide information directly to the national cemetery allows each national cemetery staff to update, add or delete records to the database.

Currently, the Gravesite Reservation Program utilizes FL 40-40 only for veterans and eligible persons to request space in a national cemetery. With this form VA is able to maintain an accurate accounting of who is reserved in a particular cemetery and who does not wish to hold their previously claimed plot.

VA's submitted a 30-day Federal Register Notice listed an incorrect title, "Gravesite Reservation Survey (2 Yr)". OMB Desk Officer was notified of this discrepancy and it was indicated that we should note in the Supporting Statement.

2. Questionnaire is necessary to assure gravesite reservations do not go unused. Some holders become ineligible, are buried elsewhere, or simply wish to cancel a gravesite reservation. If such a questionnaire were not performed, unused reservations would exist needlessly. Other veterans or eligible persons may use these spaces. The questionnaire provides full knowledge of gravesite availability.
3. Automated technology is required to prepare questionnaire, and for storage and retrieval of information upon receipt. Reservations have been reduced by approximately 800 records each year as holders become ineligible, are buried elsewhere, or cancel their gravesite reservation.
4. The information is not contained in any other VA record nor is it available from any other source.
5. The information collection does not involve small business or small entities.
6. Biennial questionnaire is made to determine if the holder desires to continue the gravesite reservation. If the information collection were conducted less frequently, the database would lack credibility.
7. There are no special circumstances requiring the collection be conducted in a manner inconsistent with the established guidelines in 5 CFR Section 1320.6.
8. The 60-day Federal Register soliciting comments on the information collection was published on November 15, 2013, page 68909. No comments were received.

9. There are no payments or gifts provided to the respondents for the gravesite set-aside program.

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 (42VA41), "Veterans and Dependents National Cemetery Interment Records-VA," as published in the Federal Register (#40 FR38095), August 26, 1995.

11. There are no questions of a sensitive nature.

12. Approximately 16, 500 respondents reply annually for a burden of 2,750 hours, as it takes 10 minutes or one-sixth (1/6) of an hour to complete the letter. Only one form letter is used, and there is no burden variance for respondents. The cost to the respondents is \$66,000 (2,750 hours x \$24 p/hr).

13. This submission does not involve any record keeping costs to the public.

14. The estimated annual cost to the Federal government is \$33,196. (Note: there are approximately 68,000 GSR holders nationwide. Of these approximately one-half (35,000) are without valid addresses, so merely the remaining 33,000 records can be contacted, (or 16,500 annually).

(a) Cost of printing/mailing FL 40-40 (16, 500 (1,375 x 12) letters per year \$14,850.

(b) Labor for maintaining a database of 33,000 records and updating as appropriate each year is equivalent to one-third (1/3) a FTEE GS 5, Step 5 \$12,872

Total Cost to the Government: \$ 27,772

15. This is no change in burden, however the form was changed to reflect an expiration date place holder and the title of the form was changed to Gravesite Reservation Questionnaire.

16. The information collection determines the holder's wishes to continue the reservation. The result of the information collection is not for publication nor is it used in a statistical report.

17. Currently there is no need to request the expiration date for OMB approval of this information to be removed.

18. The "Certification for Paperwork Reduction" is not applicable.

B. Collection of Information Employing Statistical Methods

Statistical methods are not appropriate in this instance.