

SUPPORTING STATEMENT FOR VA FORM 40-0247 AND THE PMC INSERT FORM

A. Justification

1. Since the automation of the presidential Memorial Certificate (PMC) Program in 1991, the Presidential Memorial Certificate (PMC) and the PMC insert form have been jointly sent. The PMC insert is provided for the convenience of eligible recipients and provides a method to request additional copies or to correct discrepancies in the veteran name as shown on the certificate.

The PMC program was initiated in March 1962 by President John F. Kennedy to honor the memory of honorably discharged, deceased veterans and members of the Armed Forces of the United States, and has been continued by all subsequent Presidents since that date. Statutory authority for the program is Section 112, Title 38, of the United States Code.

The National Cemetery Administration (NCA) is asking for a three-year extension for the VA Form 40-0247 and the PMC insert.

2. The purpose of the VA Form 40-0247 is to provide a method for eligible recipients to order a PMC honoring the memory and sacrifice of their loved one's service to our nation. The purpose of the PMC Insert is to allow an eligible recipient (which can or may include the next of kin, other relatives or friends, i.e., surviving spouses, sons, daughters, grandchildren) a way to request additional certificates and/or replacements or corrected certificates upon receipt of the original PMC.

Replacements are primarily requested due to damage (PMCs being bent, water soaked, or otherwise damaged during mail handling). Corrected PMCs are requested due to a spelling error in the veteran's name or changes to the inscription information provided such as the addition of a suffix or changing a middle name to an initial.

The PMC itself is parchment paper document which contains a gold foil-embossed replica of the Great Seal of the United States and bears an authorized replication of the sitting President's signature. .

PMCs may be automatically generated and sent to families and loved ones when a death benefit claim is processed, when a flag application is processed, when a veteran headstone, marker, or medallion is ordered for veterans who are buried in a private cemetery, when the veteran is buried in a State Veterans Cemetery, Department of Interior Cemetery, National Parks Cemetery, VA National Cemetery or at Arlington National Cemetery. Most all of these cases involve a recent or contemporary death and do not always directly involve the next of kin as part of ordering process. PMC requests are regularly received via US Mail or via a toll free fax line service.

3. Although the present collection of information is effective, an initiative is underway to permit electronic submission of the Presidential Memorial Certificate form. However, this is not a short term solution and may be several years away from implementation.

4. Duplication does not exist. A request for additional or corrected PMCs is a unique circumstance unassociated with any other available information and specific to the costing and methodology noted below.

5. Small business and/or the authorized representative of the family may also be involved in the request process however generally this is a personal matter instituted by a next-of-kin of an eligible veteran.

6. Requests for additional PMCs are primarily made by the next-of-kin of an eligible deceased veteran. Frequency of such requests cannot be regulated or projected.

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 Federal Register notice soliciting comments was published on November 18, 2013, page 69175-69176. One comment was received regarding the incorrect title of this collection. A special notice correction was published in the Federal Register on December 16, 2013, vol. 78, No. 241, page 76193.

Collection of data is consistent with guidelines in 5 CFR 1320.8(d). The only public contact made is with the next-of-kin that is requesting additional PMCs. Other public contact is unnecessary. Data collected is done solely by NCA to make it more convenient for the persons requesting additional PMCs.

9. There are no payments or gifts given to respondents.

10. No privacy information is being collected.

11. The Dignified Burial and Other Veterans' Benefits Improvement Act of 2012, enacted on January 10, 2013 amends Title 38 U.S.C. section 2411, to prohibit VA from providing interment or memorialization benefits to Tier III sex-offenders who were sentenced to a minimum of life imprisonment and whose conviction is final. Title 38 U.S.C Section 2411 also prohibits VA from providing interment or memorialization benefits to individuals who committed a State of Federal Capital Crime.

As a result of this law, we are now required to ask the applicant to certify that "to the best of your knowledge, that the decedent has never committed a serious crime, such as murder or other offense that could have resulted in imprisonment for life, has never been convicted of a serious crime, and has never been convicted of a sexual offense for which

he or she was sentenced to a minimum of life imprisonment. This is considered a question of sensitive nature.

12. In FY2012, 733,812 certificates were generated and sent with the PMC insert to the families and loved ones of a deceased honorably discharged veteran. Conservatively it is estimated that one quarter (1/4) of those certificate requests were generated as either a correction or a request for additional copies. The average time to complete the PMC insert form is two minutes and 183,453 certificate requests represent an annual burden of 6,115.10 hours. Only one form is used, and there is no burden variance for respondents. Estimating \$24.00 per hour for the time the respondents use to complete the PMC Insert, the estimated costs to the respondent is \$ 146,762.40.

13. There are no capital or start-up costs. There are no operational or maintenance costs and no costs associated with the purchase of service equip¹⁴. Annualized estimated cost to the Government is as follows:

Administrative Cost for the PMC Insert

One minute to review and enter recipient desires into a database
(\$47,838{GS7/5}) divided by 2087 = \$22.92 per hour cost.
Burden hours = 183,453 X one minute = 183,453 minutes divided by 60 = 3,058
hours = \$70,079.05.

Printing Cost for the PMC Insert

Printing cost of 183,453 PMC Inserts = \$2,751.80

Total Cost to the Federal Government = \$72,830.85.

15. The burden hour noted is based on the number of respondents requesting additional Presidential Memorial Certificate. An expiration date placeholder was added this form.

16. The results from the information collection is not for publication or used as a statistical report.

17. The PMC Insert will expire on xxx, 20xx. NCA is not requesting OMB approval to omit the expiration date from this form.

18. This submission does not contain any exceptions to the certification statement identified in OMB 83-I, item 19, Certification of Paperwork Reduction Act Submission.

B. Statistical Methods

This collection of information does not employ statistical methods.