

Supporting Statement for VA Form 21P-530 (Previously VA Form 21-530)
Application for Burial Benefits
(2900-0003)

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of monetary burial benefits for deceased veterans. VA requests information necessary to administer these benefits on the application form for burial benefits, VA Form 21-530, under the authority of 38 U.S.C. §§ 2302, 2303, 2307, and 2308. Revisions to the VA Form 21-530 include: 1) add a block with checkmarks to clarify the claimant's relationship to the deceased Veteran; 2) remove the block for funeral home as claimant; 3) reorganize, into separate parts, the claim for burial allowance, the claim for plot or interment allowance, and the claim for transportation reimbursement; and 4) excepting burial allowance following death in a VA medical facility and transportation expense remove requirements that claimants provide costs and proof of payment thereof.

The Department of Veterans Affairs (VA) is amending its regulations governing entitlement to monetary burial benefits, which include burial allowances for service-connected and non-service-connected deaths, a plot or interment allowance, and reimbursement of transportation expenses. As amended, the regulations establish rules to support VA's automated payment of burial allowances to surviving spouses, conversion to flat-rate burial and plot or interment allowances that are equal to the maximum benefit authorized by law, and priority of payment to non-spouse survivors. The purpose of these regulations is to streamline the program and make it easier for veterans and their families to receive the right benefits and meet their expectations for quality, timeliness, and responsiveness.

2. VA uses VA Form 21P-530 to gather the necessary information from claimants to determine eligibility for all of VBA's monetary burial benefits: burial allowance, plot or interment allowance, and transportation reimbursement.

3. VA Form 21P-530 is available on the One-VA Website 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. Program reviews were conducted to identify potential areas of duplication; none were found to exist. There is no known Department or Agency which maintains the necessary information to process burial benefits, nor is that information available from any other sources within our Department.

5. This collection of information indirectly impacts small businesses because funeral businesses provide services for which VA provides these benefits. However, VA will reduce the burden for persons applying for burial benefits and the providers of funeral

services because it reduces the documentation required from claimants to obtain payment of burial benefits. The proposed rulemaking would eliminate the need for claimants to provide receipts of burial and funeral expenses actually incurred except in claims for transportation expenses or where the death occurred in a VA Medical Facility.

6. The VA burial benefit requires current information to determine eligibility for benefits. Without the information provided on this form, it would not be possible to obtain the information needed to make a determination and reimburse a claimant. The amended collection of information will reduce the information collection burden for surviving spouses seeking burial benefits by using information about the spouse already in VA systems at the date of the veteran's death.

7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

8. VA provided notice regarding its update of this collection of information in a notice of proposed rulemaking published in the Federal Register on December 18, 2013 at 78 Federal Register 76574, 76584. VA received comments in response to this notice.

We received one comment on the proposed collection of information. The commenter thought that for a small monetary benefit, the application should be very simple. We read this as an endorsement of our elimination of the application for certain burial claims, our elimination of several questions on the application, and the reduced collection burden for applicants. We made no changes to the collection based on this comment. We consider this a non-substantive comment.

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 77 Fed. Reg. 42593 (July 19, 2012). Any disclosures of information obtained in this collection are made pursuant to the provisions of the Privacy Act, 38 U.S.C. § 5701, and 38 U.S.C. § 7332.

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents: 150,000

b. Frequency of Response: One time

c. Annual Burden Hours: 37,500

d. Estimated Completion Time: 15 minutes

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$900,000. (37,500 burden hours x \$24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs	\$2,237,550
(GS-12/5 @ \$32.73 x 150,000 x 2 minutes = \$163,650)	
(GS- 5/5 @ \$14.90 x 90,000 x 37 minutes = \$826,950)	
(GS- 3/5 @ \$11.86 x 90,000 x 37 minutes = \$658,230)	
(GS- 5/5 @ \$14.90 x 60,000 x 22 minutes = \$327,800)	
(GS- 3/5 @ \$11.86 x 60,000 x 22 minutes = \$260,920)	

GS-12/5 authorizer workload will not decrease. We expect the time previously required to process all such claims (45 min.) to be reduced by 8 minutes as a result of efficiencies obtained in this rulemaking. We further expect the processing time required for burial claims automatically paid to eligible survivors (60,000 of 150,000) as a result of the rulemaking to be reduced by an additional 15 minutes.

b. Total cost to government	\$2,237,550.00
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15. The annual reporting burden has decreased. VA has revised downward its estimate of burden hours based on more accurate historical data for the number of burial claims received annually, now projected to be 150,000 each year. In addition to the reduction in estimated claims, VA estimates that the amount of time necessary for claimants to complete the application for burial benefits is reduced from 22 minutes to 15 minutes. This is due to the program change whereby VA will no longer require claimants to provide evidence of actual costs incurred except for transportation expenses. The expiration date is being added to the form.

16. The information collection is not for publication or tabulation use.

17. We are not seeking approval to omit the expiration date for OMB approval.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.