

**Supporting Statement for**  
**Application for Pre-Need Determination of Eligibility for**  
**Burial in a VA National Cemetery** **Supporting Statement for**  
**NCA PreNeed Burial Planning**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

~~VA developed the PreNeed Burial Planning tool, VA Form 40-10007, to give Veterans, service members, and family members an opportunity to consider burial in a VA national cemetery for eligible individuals prior to the actual time of need. The purpose of this pre-need burial planning process is consistent with VA's core values to provide services in a caring manner and improve performance through the use of innovative technologies. The PreNeed Burial Planning tool is also consistent with the President's Commission on Care for America's Returning Wounded Warriors established by Executive Order 13426 in March 2007.~~

~~The PreNeed Burial Planning form, OMB Number 2900-0784, will allow VA to respond to an ever increasing demand for burial planning in advance of need. Every Veteran has a reasonable expectation of making plans for the final disposition of their remains, particularly if they desire to be interred in a VA national cemetery. Service members are trained to plan for contingencies and planning for their final disposition is no exception.~~

VA is updating the information collection, OMB 2900-0784 and associated form, VA Form 40-10007, to reflect a change from the original purpose of the collection as a pre-need burial planning tool. VA now intends to use the information and the form as a means to review and make determinations of eligibility for burial in a VA national cemetery in advance of a need. Under the revised program, VA will offer Veterans and their family members an opportunity to obtain decisions about their burial eligibility and better plan for their end of life decisions. The purpose of VA's pre-need burial eligibility program is consistent with VA's MyVA plan to streamline access to VA benefits and provide services in a caring manner through the use of innovative technologies.

VA will record an individual's pre-need information in a recallable system for use at the time of death and upon receipt of a burial request. Based on this information, Veterans and their family members will be able to communicate their burial wishes to loved ones, authorized representatives, and funeral service providers. To request a pre-need eligibility decision, individuals may submit supporting documentation along with a completed VA Form 40-10007, which VA has renamed "Application For Pre-Need Burial Determination of Eligibility for Burial in a VA National Cemetery".

**2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.**

~~VA has received requests for burial planning reviews from Veterans and service members with terminal illnesses and adult dependent children. This tool will enable VA to assist all Veterans, Servicemembers, and others make burial plans in advance of need and receive a burial benefit eligibility determination. This service is similar to pre-need planning that has been widely available in the private sector funeral industry for more than 50 years and is already offered by some state Veteran cemeteries.~~

~~The information will be collected online and through a hardcopy form, VA 40-10007. Information such as personal identifying information, military service records and other supporting documents will be entered into an electronic database, where a caseworker will review the information for accuracy and completeness. The collected information will form the basis of an eligibility determination in advance of need.~~

VA is responding to a growing interest from Veterans and their family members to plan for their burial needs prior to death. Pre-need burial request information will be collected through a hardcopy form, VA 40-10007, expiration date November 30, 2018. VA plans to implement an online form in the near future. Information such as personal identifying information, military service records, and other supporting documents will be entered by VA into an electronic database and reviewed for accuracy and completeness. The collected information will provide the basis of an eligibility determination in advance of a need for burial in a VA national cemetery.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

~~Veterans, active duty service members and family members may access the Application For Pre-Need Burial Eligibility form online and submit their completed forms electronically, along with supporting documents. The Application For Pre-Need Burial Eligibility form will also be available in a hardcopy version for those who do not have access to the online form. The completed form and supporting documents may also be mailed or faxed to VA.~~

~~We note that regardless of whether a stakeholder submits a hard copy or electronic form, the pre-need initiative will significantly reduce the paperwork burden on Veterans, service members and family members, and will reduce processing time and errors for time of need burial determinations.~~

The public may access VA Form 40-10007, Application for Pre-Need Determination of Eligibility for Burial Eligibility in a VA National Cemetery, online and submit completed forms along with supporting documents through email, US mail, or fax. The form will also be available in a hardcopy version for those who do not have access to the online form.

VA intends to convert the hardcopy form to an electronic version that will allow claimants to submit online requests. This functionality would significantly reduce the paperwork burden on Veterans and their family members and will reduce processing time and errors for time of need burial determinations.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

~~No duplication is involved. VA has no other forms or processes to collect burial planning information in advance of death of the decedent. Currently, burial planning information and documentation are collected at the time of need (i.e., death of decedent.), typically over the telephone or in person with funeral directors or next of kin.~~

There is no duplication. The information VA will collect for pre-need burial eligibility does not exist and we updating the previously approved pre-need form that was intended for burial planning.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The collection of information does not ~~impact-affect~~ small businesses in any known way. ~~The Application For Pre-Need Burial Eligibility VA's form and pre-need burial decision process merely~~only involves Veterans, ~~service members, and their eligible spouses and dependents interested in pre-planning for~~ and their family members or authorized representatives who are interested in eligibility decisions for burial in a VA national cemetery planning purposes.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

The information collection for pre-need burial eligibility decisions is significant to VA's success in meeting the growing needs of Veterans and their family members to plan for end of life decisions. Without the form and ability to collect information reflected on the form, if this collection is not conducted, VA will miss an opportunity to respond to this important need and to improve access to benefits be responsive to Veterans' needs and improve service to Veterans, service members and their family members who want to plan for a critical life event. Currently, VA offers no personalized assistance to families to plan for burial in a national cemetery prior to the time of need. There are no known technical or legal obstacles associated with reducing the burden on families at their time of need by collecting information from individuals who voluntarily seek VA's assistance in pre-planning for burial in national cemetery.

**7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce**

valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

None of the special circumstances described above will occur as a result of collecting pre-need burial [eligibility planning](#) information.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden. The**

Department's 60 day notice was published on February 12, 2015, FR/Vol. 80, No. 29, pages 7909-7910. There were no comments received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

A user's personal information will be kept private, in strict accordance with VA privacy policies. Social Security numbers and military service numbers are requested solely to ensure proper identification of records. All respondents will be informed that all submitted material and information falls within the purview of the Privacy Act of 1974, and will be safeguarded in accordance with the applicable System of Records Notice (SORN). The SORN for the pre-need data is 42VA41.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

VA will not be collecting information described above. Use of [VA Form 40-10007 the Application For Pre-Need Burial Eligibility form](#) is purely voluntary and VA ~~need will~~ only collect and review information relevant to establishing [burial eligibility for burial in a VA national cemetery](#).

**12. Estimate of the hour burden of the collection of information:**

We estimate that it will take ~~each of the 36,000 8,000~~ respondents approximately fifteen (15) minutes to complete a [VA Form 40-10007 pre-need planning form](#) and submit it along with supporting documents. The burden hours will be ~~9,0002,000~~. (~~36,000 8,000~~ respondents x15 minutes / 60 minutes = ~~9,0002,000~~ hours)

We estimate that the typical pre-need stakeholder will take approximately five (5) minutes to complete the form and an additional 10 additional minutes to gather and submit supporting documents. Use of VA Form 40-10007 is voluntary and should only be submitted once.

~~Comparatively, on average, a routine, initial time-of-need burial-eligibility information collection runs an average of nine minutes. Supporting documents are provided in follow-up phone calls to the applicant. However, we estimate that the typical pre-need stakeholder will take approximately five (5) minutes to complete the pre-need planning form because there will be no telephone conversations with VA staff and no funeral arrangement information to discuss. We estimate that pre-need stakeholders will need approximately 10 additional minutes to gather and submit supporting documents. Use of the Application For Pre-Need Burial Eligibility form is purely voluntary and if selected, should only be submitted once on behalf of an interested stakeholder.~~

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

The respondent bears no costs.

**14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Initial estimated operational costs include adding one-four employees who will work at the National Cemetery Scheduling Office in St. Louis, Missouri. ~~This-These~~ employees ~~is-are~~ needed to process and issue pre-need burial eligibility planning information and issue burial-eligibility determinations. Annual average cost is projected to be ~~\$250,000~~\$50,000. Additional equipment costs may be necessary to support the employees.

**15. Explain the reason for any program changes or adjustments reported in Items 13 or 14 of OMB 83-I**

VA is responding to the emerging needs of Veterans and their family members to plan for burial in a VA national cemetery. We are moving from a mere planning tool to providing determinations of eligibility. This change supports the Secretary's MyVA plan to streamline access to benefits and meets the core values of integrity, commitment, advocacy, respect, and excellence (ICARE). NCA was recently granted OMB approval for a non-substantive change to VA form 40-10007 December 18, 2015.

~~This is a current collection that was first approved on 8/27/2012. There are no program changes or adjustments reported in this submission. Following approval, the OMB expiration date will be included on the instrument, VA form 40-10007.~~

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be**

used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Implementation of the project is expected by late calendar year 2016. Information will be collected on an ongoing basis.

**17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We do not seek approval to omit the expiration date.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.**

There are no exceptions.

## ***B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS***

No statistical methods are used in this data collection.