

JUSTIFICATION FOR VA-FSC VENDOR FILE REQUEST FORM

VA FORM 10091

2900-NEW

A. JUSTIFICATION

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

The mission of the Nationwide Vendor File Division of the Department of Veterans Affairs – Financial Services Center (VA-FSC) is to add, modify, or delete vendor records in the Financial Management Services (FMS) Vendor File. The VA-FSCs FMS Vendor File controls aspects of when, where, and how vendors are paid. There are currently more than 2.4M active vendor records in FMS. The Authorizing statute for this data collection falls under 31 USC 3701, and Public Law 104-134, Section 31001, Debt Collection Improvement Act of 1996.

In 1987, Treasury implemented several initiatives to encourage agencies to convert their vendor and miscellaneous payment activity from checks to the Automated Clearing House (ACH) payments. By 1996, the Debt Collection Improvement Act (DCIA) **mandated** the use of electronic funds transfer (EFT) for federal payments. In order to comply with these federal requirements, the VA and other Federal Agencies have used OMB # 1510-0056 / Standard Form 3881 (SF 3881) to collect the essential payment data from vendors (i.e. Name, Address, SSN/TaxID, Financial Institution, Routing and Transit Number and Bank Account Number) to establish payment files. However, because SF 3881 lacks the necessary information fields to communicate the type of Vendor record required (i.e. commercial, individual, veteran, employee, etc.) the VA-FSC required all SF 3881 submissions to have an accompanying Vendorizing Cover Sheet included to ensure proper document processing.

The new Vendorizing Form (VA10091) streamlines the data required to establish a vendor record (from the SF 3881 and Vendorizing Cover Sheet) into a single form. By the summer of 2014, the VA-FSC began utilizing the VA10091 for Vendorizing purposes. Email communications demonstrating the VA-FSCs efforts to obtain OMB Approval date back to October 2014; however, due to organizational changes within the VA-FSC Vendorizing Division, OMB Approval efforts were not completed. As a result, information has been (and continues to be) collected using the non-OMB approved form.

In November 2015, the first 60-day Federal Register Notice was published. VA10091 was updated to include the OMB temporary number “OMB 2900-NEW” and continues to be utilized for Vendor Record change requests. To date, only one Customer Service-related comment was received regarding the VA10091 form. That comment was elevated to the VA-FSC Nationwide Vendor File Supervisor for review. No changes to the form were recommended.

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.

Identical to its predecessor (OMB # 1510-0056 / SF 3881), the VA10091 – VA-FSC Vendor File Request Form, will be used throughout the VA to gather essential payment data from vendors (Commercial, Individuals, Veterans, Employees, etc) to establish or update vendor records in

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order to process electronic payments through the ACH network to the vendor's financial institution. The new Vendorizing Form (VA10091) streamlines the data required to establish a vendor record (from the SF 3881 and Vendorizing Cover Sheet) into a single form.

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.

The VA10091 (and its predecessor - SF 3881) Vendorizing Requests have been / and continue to be submitted almost exclusively by Fax. The current method requires the user to obtain a blank form, fill it out in ink and fax to the Nationwide Vendor File Division.

Upon OMB approval, the VA-FSC will move forward with efforts to develop a secure, web-based form which can be accessed and completed using any device with internet access. This method will improve the accuracy of enrollment information; reduce the burden and costs associated with the formal enrollment process and expedite the Vendorizing / Payment process.

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.

The information on the VA10091 (which replaces the SF 3881 and Vendorizing Cover Sheet) is collected to establish a vendor payment file and effect payments electronically. There is no other similar information that can be used to effect payments electronically.

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

There is no correlation between the size of the business and amount of data required and or the amount of time required to complete the VA10091 form. The collection of information will have no significant effect on small businesses and other small entities.

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 collection of this information is usually a one-time collection from each vendor and cannot be collected less frequently. If the collection is not conducted Federal agencies will be unable to comply with Public Law 104-134 (DCIA).

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

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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.

The collection of this information is conducted in a manner which is consistent with the guidelines in 5CFR1320.6.

8.

- a. 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 notice of Proposed Information Collection Activity was published in the Federal Register on Monday, November 30, 2015 (Vol. 80, No. 229, Notices, page 74837-74838).

Only one public comment by anonymous submission, received Dec 7, 2015, was in response to this notice, but it did not request or suggest changes to the proposed form. The comment, which was related to customer service, was forwarded to the Nationwide Vendorizing Supervisor for review/action.

- b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.**

The VA10091form was developed in response to feedback received from customers (other VA agencies, Veterans, Caregivers, Medical Professionals, etc.) who were frustrated with the predecessor form (SF 3881) to establish Vendor Payment Records. The VA-FSC values our customer's feedback and seeks continuous improvement of the services provided. Therefore, the VA-FSC will continue to consult with our various customer representatives to ensure the optimization of the form.

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

No payment is made to collect this information.

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

The information collected is confidential in nature. The VA10091 form contains a Privacy Act statement which reads, "All information on this form, including the individual claim number, is required under 31 USC Part 3322, 31 CFR Part 209 and/or 210. The information is confidential as required by law and is needed to prove entitlement to payments. The information will be used to process payment data from the Federal agency to financial institution and/or its agent. Failure to provide the requested information may affect the processing of this form and may delay or prevent the receipt of payments through the Direct Deposit/EFT Program. The applicable System of Records Notice is 13VA047, Individuals Submitting Invoices-Vouchers for Payment-VA.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), 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.

There are no questions that are of a sensitive nature.

12.

a. Estimate of the hour burden of the collection of information:

Number of respondents: 150,000 x frequency of response: 1 x .25 (15 minutes) = 37,500 annual burden hours.

The hour burden is estimated based on the time it takes to provide this agency the name of the financial institution, routing number (RTN), and account number.

Extrapolating from FY12, FY13 and FY14 archived records, we estimate that 150,000 businesses, employees, veterans, etc., will submit a VA Form 10091 to add, modify, delete a Vendor File each year. Each submission is expected to take 15 minutes to respond.

Year	Number of Respondents	Minutes/Response	Divided by 60	Burden Hours
1	150,000	15	60	37,500
2	150,000	15	60	37,500
ANNUAL AVERAGE	150,000	15	60	37,500

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- b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.**

Not applicable.

- c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.**

There is no evidence that respondents bear any costs as a result of this information requirement. The information requested, name of financial institution, RTN, and account number, is information that is readily available and often requested by other non-government entities doing business with the vendors. No operational or maintenance cost is associated with the collection of this information There are no associated record keeping costs.

- 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).**

There is no evidence that respondents bear any additional capital or start-up costs as a result of this information requirement. The information requested, name of financial institution, RTN, and account number, is information that is readily available and often requested by other non-government entities doing business with the vendors. No operational or maintenance cost is associated with the collection of this information There are no associated record keeping 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.**

Estimates of annualized costs to the Federal Government is \$161,175.

Processing information from 150,000 forms x 3 minutes
(.05) x \$21.49 per hour for government employees (GS7, Step 5)
(or 150,000 x .05 x \$21.49)

\$161,175

- 15. Explain the reason for any burden hour changes since the last submission.**

This is a new data collection request, therefore all hours are considered an increase in burden.

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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.

Collected information will not be published.

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

VA does not seek 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.