

SUPPORTING STATEMENT
VA FORM 29-0759
SUSPENSION OF MONTHLY CHECK
2900-0635

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 form is used by the Department of Veterans Affairs to advise the beneficiary that his/her monthly check has been suspended. The information requested is authorized by law, 38 U.S.C. 1917.

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.

The data collected on the form is used by the Department of Veteran Affairs (VA) to try to obtain a better address from the beneficiary.

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.

VA Form 29-0759 is available on the One-VA web site 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. Describe efforts to identify duplication. Show specifically why all similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information is not contained in any other VA records. Similar information is not available elsewhere.

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

The information does not involve any small businesses.

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 form is designed for use by the beneficiary to establish a better address for receipt of a monthly check.

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.

There are no special circumstances requiring that the collection of information be conducted in a manner inconsistent with the guidelines in 5 CFR Section 1320.6.

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 sponsor in response to these comments. Specifically address comments received on cost and hour burden.

The Department notice was published in the Federal Register on February 27, 2018, Volume 83, No. 39, page 8573. One public comment was received in response to this notice.

Public Comment:

Dear Ms. Kessinger:

OMB Control Number: 2900-0635 refers to Suspension of Monthly Check (VA Form 29-0759).

Whenever a Department of Veterans Affairs (VA) Notice is published in the Online Federal Register (FR – <https://www.federalregister.gov/agencies/veterans-affairs-department>) pertaining to requesting public comment on a change to an

existing collection of records OR a new collection of records maintained by VA, there are a significant lack of necessary documents to allow such public comment. The new or revised form/content is not included in the VA FR Notice so there is no way to compare these changes with what is already part of the collection. Additionally, in many cases, there may be other Supporting Statements associated with this collection change that may provide insight on why this change is being proposed but they are not part of the FR Notice. This is the case in all Notices up for OMB review AND many other Notices that indicate a change to a record collection maintained by VA.

The online FR as indicated in the link above ALREADY has an easy way to rectify this situation and provide those missing documents that would then allow public comment. The online FR allows a sidebar section titled “Enhanced Content” that has a subsection within it called “Supporting/Related Materials”. Those missing documents (new/revised collection form/content as well as any Supporting Statement) could be included within that subsection in the VA FR Notice.

I suggest making this change to include those missing documents in the Enhanced Content portion of the online FR Notice and this will then allow any necessary public comment to be provided. This only needs to be provided for revisions and additions to record collections (in some cases reinstatements of record collections that no longer have available content on the Internet). Extensions of already approved collections do NOT need to have this Enhanced Content.

Roland Roberts

VA’s Response to Public Comment:

Mr. Roberts –

VA forms managers do upload the information collection instruments (forms, surveys, etc.) and the supporting documents for the information collection into ROCIS (GSA Data Base). At the present time we have not been required to upload these same documents to the Federal Register. The Federal Register Notice does provide the VA contact information so that the public can request the documents from either the VA Clearance Officer (Cynthia Harvey-Pryor) or myself (Nancy Kessinger). If the VA Clearance Officer determines that VA forms managers will start using the “Enhanced Content” feature and she notifies us of this change we will proceed to use the feature.

Nancy J. Kessinger
VBA Forms Manager (20M33)
202-632-8924
nancy.kessinger@va.gov

9. Explain any decision to provide any payment or gift to respondents.

The information collected is supplied by the respondent. No remuneration is made.

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

The information collection conforms with the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein. The records are maintained in the system identified as 36VA00, "Veterans and Armed Forces Personnel United States Government Life Insurance Records - VA" as contained in the Privacy Act Issuances, 1993 Compilation.

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.

There are no questions of a sensitive nature.

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

- a. Number of Respondents: 500
- b. Frequency of Response: On occasion
- c. Annual Burden Hours: 83 hours
- d. Estimated Completion Time: 10 minutes
- e. The respondent population for VA Form 29-0579, is composed of individuals gathering the necessary information needed to establish a better address for receipt of a monthly check. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers are \$954.40. Assuming a forty (40) hour work week, the mean hourly wage is \$23.86 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website:
(http://www.bls.gov/oes/current/oes_nat.htm#00-0000, May 2016).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$1980.38 (83 burden hours x \$23.86 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

This submission does not involve any 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.

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
9	3	5	.16	\$22.42	3.59	500	\$ 1793.60
Overhead at 100% Salary							\$ 1793.60
5	3	2	0.06	\$14.79	.89	500	\$ 443.70
Overhead at 100% Salary							\$ 443.70
4	3	2	0.06	\$13.22	.79	500	\$ 396.60
Overhead at 100% Salary							\$ 396.60
Processing / Analyzing Costs							\$ 5267.80
Printing and Production Cost							\$ 54.00
Total Cost to Government							\$ 5321.80

Note: the hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

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

The respondent burden has decreased because fewer forms are being returned by the Veterans.

This form is the reinstatement of a currently approved collection. This ICR expired due to a transition in the VA Insurance Service that affected the process for ensuring that expiring VA Insurance ICR's were submitted to OMB in a timely manner. The collection of form changes and training PRA duties to correctly enter revisions exceeded the ICR expiration date.

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.

The information is collected for insurance purposes only and there are no plans for publication.

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

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

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

PART B

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.