

Presidential Memorial Certificate Form VA Form 40-0247.
OMB 2900-0567
VA Form 40-0247

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 Presidential Memorial Certificate (PMC) is an engraved paper certificate, signed by a current U.S. President, to honor the memory of deceased Veterans who are eligible for burial in a national cemetery. Information collection under OMB No. 2900-0567 and VA Form 40-0247, Presidential Memorial Certificate Request Form, is required to properly inscribe and address for delivery of the PMC. Supporting military or discharge documents are also needed to verify that the veterans character of service and duty status meet program eligibility and legal requirements in accordance with U.S.C. Title 38 § 112: Presidential memorial certificate program and § 2411: Prohibition against interment or memorialization in the National Cemetery Administration or Arlington National Cemetery of persons committing Federal or State capital crimes.

NCA is updating VA 40-0247, Presidential Memorial Certificate Request Form, Section II, Veterans Service Members Information, to include personal information necessary for statistical data gathering, targeted outreach and utilization trend analysis. The Veteran will be better served and there will be effective delivery of memorial benefits.

- 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.**

Supporting military documents and VA Form 40-0247 are received by VA National Cemetery Administration, Memorial Products Service, Presidential Memorial Certificates Unit via two primary delivery sources. Those are via United States Postal Service mailed directly to the PMC Unit or sent via a toll free 800 line fax service. Information collected is used to establish eligibility to receive the certificate and to provide delivery information.

- 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 public may access VA Form 40-0247, Presidential Memorial Certificate Request Form, online and submit completed forms along with supporting military documentation through USPS or fax.

Once received, mailed forms are scanned creating a graphic file which is moved into an accessible electronic data base. Each image is date and time stamped to ensure that the oldest requests are processed first. PMC personnel process each request by reviewing the documents and the information on the forms is transposed manually into the PMC order processing file. Documents submitted via the toll free 800 fax service automatically create an image file which is also put into an electronic bin for review and processing. No other "electronic, manual, or collection" methods are employed. On line submissions are not permitted but forms are made available via our web site where respondents can manually complete our application form while on line and print the form for signature. The respondents burden to complete the form both on line and manually are identical and should not exceed 3 minutes.

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.

There is no duplication. The PMC is only provided for the family and loved ones of a deceased Veteran. Similar information is not in NCA records prior to the time of need for burial services so similar sources are not available.

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 small or other business entities in any known way. Submission of VA Form 40-0247 is voluntary from potential requestors.

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.

Data collected for the PMC program is crucial to VA's success in carrying out the request of the President to honor the memory of deceased Veterans. Without the form and ability to collect information reflected on the form, VA will not be able to offer a PMC to the individual family members and loved ones who only request a PMC and no other burial benefit. Not having the form will also prohibit the VA's ability to carry out the assigned task of providing a PMC to all of the families and loved ones of a qualified person acknowledging that a grateful nation appreciated the Veterans military service. Requests are processed as submitted so there is no additional burden expected for respondents. There are no known technical or legal obstacles associated with reducing the burden on families at their time of need by collecting information from a requestor who voluntarily completes the form to obtain a PMC.

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

- 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 Notice was published in the Federal Register on Tuesday, May 19, 2020, Volume 85, No. 97, page 30023. No public comments were received in response to this notice.

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

No payments or gifts to respondents have been made or will be provided to respondents under this collection of information.

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

An individual's personal information will be kept confidential and in strict accordance with VA privacy policies and applicable legal authorities. Social Security numbers and military service numbers are requested solely to ensure accurate identification of records for the purpose of determining veteran status and eligibility for the named service member. 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 VA SORN would be "Veterans and Dependents National Cemetery Interment Records" (SORN #42VA41A).

- 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 of a sensitive nature. Use of VA Form 40-0247 is voluntary and VA will only collect and review information relevant to provision of a PMC. The personal information asked on these forms is necessary for statistical data gathering, targeted outreach and utilization trend analysis, and to better serve the Veteran and for the effective delivery of burial and memorial benefits. The form collects the applicant's race, ethnicity, date of birth and death, and gender identity information to assist with obtaining demographics information in order to better serve Veterans who may not be aware of our benefits and services. Other than gender selection, the applicant is informed that the information collected will be used for statistical purposes only.

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

Estimate of Information Collection Burden.

- a. Number of Respondents: 125,000 annually
- b. Frequency of Response: One-time
- c. Annual Burden Hours: 6,250 hours
- d. Estimated Completion Time: 3 minutes
- e. According to the U.S. Bureau of Labor Statistics the Mean Hourly Wage for all employees (Occupation code 00-0000, May 2019 Wage Estimates United States) is \$ 25.72 per hour. This makes the total cost to the respondent \$1.28 (.05 burden hours multiplied by the per hour average pay rate of \$ 25.72 per hour).
Source: https://www.bls.gov/oes/current/oes_nat.htm#00-0000

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

This submission does not impact any recordkeeping 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.

Since this is not a new process, the cost is already budgeted in the National Cemetery Administration's budget. No additional expected costs are to be incurred by the government. Forms availability via the inter/intranet forms website.

The estimated cost includes eight employees (five GS-7 Program Support Assistants, one GS-4 Program Support Clerk, One GS-9 Lead Program Specialist, and one GS-12 Supervisor) who currently works in the Presidential Memorial Certificate unit. This staff will receive, review, and process an estimated {125,000} request forms annually.

Review by an NCA Program Support Assistant at GS-7/1 is 125,000 responses, times .5 (30 minutes), which equals 62,500. We divide 62,500 by 60 minutes to reach the total burden hours for review at 1,041.66 hours. Hours 1,041.66 is multiplied by the GS 7/1 hourly rate of \$20.72 to equal \$21,583.19. Thus, \$21,583 times 5 Program Support Assistants equals \$107,915.97.

Review by an NCA Program Support Clerk at GS-4/1 is 125,000 responses, times .250 (15 minutes), which equals 31,250. We divide 31,250 by 60 minutes to reach the total burden hours for review at 520.83 hours. Hours 520.83 is multiplied by the GS 4/1 hourly rate of \$14.95 to equal \$7,786.45.

Review by an NCA Lead Program Specialist at GS-9/1 is 125,000 responses, times .250 (15 minutes), which equals 31,250. We divide 31,250 by 60 minutes to reach the total burden hours for review at 520.83 hours. Hours 520.83 is multiplied by the GS 9/1 hourly rate of \$25.35 to equal \$13,203.04.

Review by an NCA Supervisor at GS-12/1 is estimated to be 125,000 responses, times .250 (15 minutes), which equals 31,250. We divide 31,250 by 60 minutes to reach the total burden hours for review at 520.83 hours. Hours 520.83 is multiplied by the GS 9/1 hourly rate of \$36.76 to equal \$19,145.71.

Total Cost to the Government = \$148,051.17.

The OMP link is https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/RUS_h.pdf.

1. Explain the reason for any burden hour changes since the last submission.

There is no change in burden.

2. 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 collection is not for publication or tabulation use.

3. If seeking approval to not display 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.

4. 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.

B. Collection of Information Employing Statistical Methods

This collection of information does / does not employ statistical methods.