

**Supporting Statements**  
**Verification of Eligibility for Burial in a National Cemetery**  
**OMB 2900-0232**  
**VA Form 40-4962**

**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 requires this information to verify eligibility for burial in a national cemetery, to schedule interment and to provide services requested by the decedent's family or personal representative. This information is also used for planning and scheduling cemetery burial services and to provide for specific requests from family members or the personal representative, such as contacts for funeral honors to be performed during committal or memorial services.

VA is requesting OMB approval for the information collection OMB 2900-0232 to reflect the streamlining of our methods to collect eligibility information using electronic and automated means to verify eligibility, schedule interment and provide for cemetery burial services.

Also, Public Law 103-446 Section 509 Subsection 317(a)(5) requires the VA Center for Minority Veterans to "conduct and sponsor appropriate social and demographic research on the needs of veterans who are minorities and the extent to which programs authorized under this title meet the needs of those veterans, without regard to any law concerning the collection of information from the public." VA proposes to collect such social and demographic data on this form, VA 40-4962, to include the applicant's race and ethnicity, for the purpose of fulfilling this legal requirement.

- 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 must determine a deceased person's eligibility for burial in a national cemetery when burial is requested. The information is used by VA to solicit eligibility information, to make burial arrangements, facilitate interment scheduling and to provide specific services associated with burial requested by a decedents' family or personal representative.

- 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.**

In 1996, NCA began using a computer-based system of records called Burial Operations Support (BOSS) to collect decedent and family or personal representative information and provide delivery of the burial benefit. In 2006 NCA went to a centralized call center to take burial applications for all VA national cemeteries. BOSS automation was also extended to support National and State Veteran Cemeteries. BOSS/AMAS operates under System of Record Notice (SORN) 41VA411, 42VA41, and 48VA40B. BOSS is used to collect and maintain information to verify the identity and eligibility of the Veteran or decedent for

burial and monument services. BOSS is also an automated program used to assist in verification and eligibility. In 2019, NCA began using the Memorial Benefits Management System (MBMS) in conjunction with BOSS. MBMS functionality continues to expand and mature; it is intended to eventually replace BOSS/AMAS.

This burial request tool will also provide an alternative means to assist those charged with burial planning to provide information to VA. The information can be collected utilizing an online form request. Information such as personal identifying information, military service records, and other supporting documentation will be entered into an electronic database where a caseworker will review the information for accuracy and completeness.

- 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 is not contained in any other VA record nor is it available from any other source.

- 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 involve small businesses or 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.**

VA would be unable to properly administer cemetery services, perform interment scheduling or verification of eligibility for burial in a national cemetery without this collection of information. The information is collected on an ad hoc basis, and, therefore cannot be collected less frequently.

- 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 that would cause this information collection to be conducted more often than quarterly.

- 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 May 12, 2020, Volume 85, No. 92, page 28138. No comments were received.

**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 will be made 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.**

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 information collection conforms to the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein which provides assurance of privacy to the extent permitted by law. The records are maintained in the system identified as (42VA41), "Veterans and Dependents National Cemetery Interment Records-VA," for use in connection with verification of eligibility for burial in a national cemetery and for statistical data gathering, targeted outreach and utilization trend analysis. Other systems are (41VA41) "Veterans and Dependents National Cemetery Gravesite Reservation Records", for use in connection with verification of eligibility for burial in a national cemetery when making gravesite reservations and for statistical data gathering, targeted outreach and utilization trend analysis. Also included is (48VA40B) "Veterans (Deceased) Headstone or Marker Records", For use in connection with verification of eligibility for burial in a national cemetery and for statistical data gathering, targeted outreach and utilization trend analysis.

**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.VA may ask demographic information and religious or faith-based beliefs.

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. The applicant is informed that the information will be used for statistical purposes only. SORN 40VA40B is being updated for routine uses of records maintained in the system.

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

We estimate that it will take each of the 135,000 respondents approximately fifteen (15) minutes to submit the information and submit it along with supporting documents. The burden hours will be (135,000 respondents x 15 minutes / 60 minutes = 33,750 hours. Estimate of Information Collection Burden

- a. Number of Respondents: 135,000
- b. Frequency of Response: 1
- c. Annual Burden Hours: 33,750
- d. Estimated Completion Time: 15 min
- e. The May 2019 Bureau of Labor Statistics (BLS) U.S. Occupational Employment and Wage Estimates gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers is \$868,050. Assuming a forty (40) hour work week, the mean hourly wage is \$25.72 based on the BLS wage code – “00-0000 All Occupations” (33,750 burden x \$25.72). This information was taken from the following BLS website: ([https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](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).**

The respondent bears no costs and this submission does not involve 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.**

There will be no costs to the government beyond the normal labor costs for staff. The estimated labor costs for staff include salaries for 51 employees (forty-six GS-7 Program Support Assistants, three GS-8 Program Support Assistants, one GS-11 Supervisor, and one GS-12 Supervisor who are employed at the National Cemetery Scheduling Office (NCSO) in St. Louis, MO. These NCSO employees process the respondent's applications and provide burial scheduling services. The workload is estimated in item 12 at 135,000 respondents. In each year it is estimated that VA would receive approximately 135,000 requests from respondents for time of need verification of eligibility. When a respondent contacts the NCSO requesting burial, the NCSO staff are all able to assist those seeking burial in a national cemetery.

The average annual salary for these 51 federal employees equates to approximately \$2,614,841. This average was calculated by using the average annual federal salary in St. Louis of forty-six GS-7 federal employee (\$2,287,764) three GS-8 employees (\$165,243), one GS-11 Supervisor (\$73,607) and one GS-12 supervisor (\$88,227). The total estimated annual personnel cost is \$2,614,841. The printing cost to government is

\$0 because the electronic form will be available on the VA internet website. The total estimated cost to the government is \$2,614,841.

Estimated Costs to the Federal Government:

- a. Processing/Analyzing costs -\$2,614,841
- b. Printing and production cost - \$0
- c. Total cost to government - \$2,614,841

Source: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SL.pdf>

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

VA is responding to the needs of Veterans and their family members to plan for and schedule a burial in a national cemetery. We are streamlining our methods to collect eligibility information and we are using electronic and automated means to verify eligibility, schedule interment and provide for cemetery burial services.

NCA has revised form VA-40-4962 to include collection of social and demographic data, including the applicant's race and ethnicity for the purpose of fulfilling legal requirements.

**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 collection is not for publication or tabulation use.

**17. 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.

**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.

**B. Collection of Information Employing Statistical Methods**

This collection of information does not employ statistical methods.