

**SUPPORTING STATEMENT A**  
**Grant Funded Cemetery Data, VA Form 40-0241 and**  
**Cemetery Grant Documents, 40-0895 Series**  
**OMB Control Number: 2900-0559**

Note: Summary of Changes from Previously Approved Collection

- There are revisions to instruments of collection to add new instructions and new fields.
- There are revisions to instruments of collection since three instruments of collection are no longer being used.
- This ICR type is a revision and the total time burden decreased from 610 hours to 296 hours.
- There were no received comments on the 60-day FRN.

**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 Grant Funded Cemetery Data form, VA Form 40-0241, and the Cemetery Grant Document Forms, 40-0895 series, are required to provide data regarding the number of interments conducted at State Veterans cemeteries and support grant applications each year. This data is necessary for budget, oversight and compliance purposes associated with existing and establishment of new State and Tribal government veteran cemeteries. In addition, the Department of Veterans Affairs (VA's) Veterans Cemetery Grants Program needs this data to answer questions which arise during the year to respond to Congressional correspondence and to project and predict the need for burial space and the demand for state grants. Burial data tells us usage rates and helps in the prediction of when a cemetery needs to develop additional acreage (request a grant to expand) or if a cemetery is going to close. The amount of acreage used helps the Veterans Cemetery Grants Program and National Cemetery Administration (NCA) anticipate the closing and the requirement for additional cemeteries (either State or national). Lower burial rates may indicate problems such as ineffective outreach or poor maintenance that should be investigated. The data is used in conjunction with the data gained from the national cemeteries to consider where to place national or state cemeteries. 38 CFR, Part 39.3 states that "the Secretary and any authorized representative (in this case the Veterans Cemetery Grants Program) will have access to and the right to examine all records, books, papers, or documents related to the grant." Part 39.5 discusses follow-up procedures once a cemetery is established and states the need for audits, etc. The Cemetery Grant Document forms are used to document and evaluate state submissions in compliance with grant preapplications in 38 CFR, Part 39.

**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 gathered annually is used by the Veterans Cemetery Grants Program to conduct studies and award State and Tribal government Veteran cemetery grants. For example, the Program uses this data to demonstrate to the States (especially those without State Veterans' cemeteries) not only the viability of the program, but to demonstrate that they have a need. The Veterans Cemetery Grants Program can demonstrate that State Veterans cemeteries are needed, and a demand exists for the services provided. The Veterans Cemetery Grants Program is a user of this data as is the Office of the Deputy Under Secretary for Field Programs and the Budget and Planning Service in the Office of the Deputy Under Secretary for Finance and Budget

in NCA. States use this data as well as congressional offices, veteran's organization and interested citizens.

**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 agency utilizes electronic collection of most of the data requested on the forms. New pre-applications are required to be submitted through grants.gov. The Grant Funded Cemetery Data form, with an explanation to fill it out, is relatively simple. It is designed to be simple for a person to fill-out and the user (Veterans Cemetery Grants Program) to extract data (see attached form). The Grant Funded Cemetery Data form and the Cemetery Grant Document forms are available on the VA's forms website.

**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 Grant Funded Cemetery Data form and the Cemetery Grant Document Series are the only reports required from the State veterans cemeteries to determine current usage and support future grant applications.

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

The forms do not impact 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.**

If this data were not collected, the Veterans Cemetery Grants Program would be hampered in its ability to document cemetery usage and ensure compliance with grant award requirements, convince States and Tribal Governments to apply for grants and to accept the burden of operating and maintaining these cemeteries in perpetuity. Without the forms, the Veterans Cemetery Grants Program could not answer various congressional or State correspondence or internal inquiries within VA to support the usage at the cemeteries or the documentation to support future grant awards. The budget process would be hampered by our inability to provide objective data required of us to justify and explain the program. NCA could not compare the state grants program to other similar programs, which data is periodically asked for. Without the data, NCA could not anticipate the need for new or additional burial space.

**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 such special circumstances.

**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.**

In accordance with 5 CFR 1320.8(d), NCA published a 60-day notice in the Federal Register on July 7, 2023 (Volume 88, Number 129, Page 43423). NCA received no comments in response to this notice.

**8.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.**

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

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

No payment or gift is provided to respondents.

**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.**

There are no assurances of confidentiality in connection with these forms. The result of studies gained from the data is passed back to the States in a generic form. We do produce a "ranking" of the most active State veterans' cemeteries, but do not produce a ratio expressing the relationship between operating costs and numbers of burials. Too many variables, including climate and local expectations, would tend to make such comparisons unproductive. Data is generally aggregated on a national or multi-state basis, or the data is used to respond to a specific question that does not include such comparisons. Nonetheless, there is no assurance of confidentiality offered or implied.

**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.

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

Estimated Burden Hours
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VA Forms	Estimated No. of Respondents	(x) times Estimated No. of Responses	(x) times Average Minutes Per Response	= (Equals)	÷ by 60 =	Actual Number of Burden Hours
Grant Funded Cemetery Data, 40-0241	121	1	90 minutes	10,890		181.5
Compliance with Provisions of the Davis-Bacon Act 40-0895-2	15	1	15 minutes	225		3.75
State or Tribal Government Cemetery Grants Service Space Program Analysis – Buildings 40-0895-3	15	1	180 minutes	2,700		45
State or Tribal Government Matching Architectural and Engineering Funds to Qualify for Group 1 on the Priority List 40-0895-6	15	1	30 minutes	450		7.50
Debarment, Suspension, Ineligibility and Voluntary Exclusion – Primary Covered Transactions (State or Tribal Governments 40-0895-7	15	1	15 minutes	225		<b>3.75</b>
Drug-Free Workplace Requirements for Grantees Other Than Individuals 40-0895-8	15	1	15 minutes	225		<b>3.75</b>
Lobbying 40-0895-9	15	1	15 minutes	225		<b>3.75</b>
Compliance with Federal Requirements – State or Tribal Government Construction Grant 40-0895-10	15	1	15 minutes	225		<b>3.75</b>
Debarment, Suspension, Ineligibility and Voluntary Exclusion – Primary Covered Transactions (Contractor 40-0895-12	21	1	15 minutes	315		<b>5.25</b>
Documents and Information Required for State or Tribal Cemetery Construction Grants – Post Grant Requirements 40-0895-13	15	1	120 minutes	1,800		<b>30</b>
Major Requirements for State or Tribal Government Cemetery Construction Grants 40-0895-14	15	1	15 minutes	225		<b>3.75</b>
Cemetery Maintained in Accordance with National Cemetery Administration Standards 40-0895-15	15	1	15 minutes	225		<b>3.75</b>

ACCUMULATIVE TOTAL	292					296
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NCA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, NCA uses 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 mean hourly wage is \$29.76 based on the BLS wage code – "00-0000 All Occupations." NCA estimates the total cost to all respondents to be \$8,808.96. (296 burden hours × \$29.76 per hour).

Source: May 2022 National Occupational Employment and Wage Estimates United States: [https://www.bls.gov/oes/2022/may/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/2022/may/oes_nat.htm#00-0000)

**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).**

- a. There are no capital, start up, operation or maintenance costs for respondents.
- b. Cost estimates are not expected to vary widely. The only cost is respondent's time.

**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.**

NCA estimates administering the VCGP forms by a GS 9 Step 1 to be \$10,298.84 based on 292 responses annually. This amount is based on a processing time of one (1) hour per response in the Veterans Cemetery Grants Program, NCA, using a salary of a GS 9 Step 5 (\$35.27 per hour).

In addition, a GS 13 Step 2 (\$55.46 per hour) transcribes and reviews the VA40-0241 form into one document produced for use by VCGP. NCA multiplies 121 responses by 0.5 (30 minutes) to equal 3,630 minutes. NCA divides 3,630 minutes by 60 minutes to get the burden hours for transcription and review (60.5 hours). Next, NCA multiplies 60.5 hours by the hourly rate of a GS 13 Step 2 (\$55.46) to reach the transcription and review cost of \$6,710.66.

The total annualized cost burden to the Federal Government is \$17,010.

If this form were not used, Federal costs would be much higher because staff would have to spend many hours on an ad hoc basis, interviewing state cemeteries and responding to questions as they arise rather than being able to review collected data to answer questions. The Cemetery Grant Document forms are essential in properly developing proposed projects and for the Federal Government to ensure compliance with 38 U.S.C. 501, 2408 and 38 CFR Part 39. Grants would not be awarded without the documentation.

Source: [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf)

**15. Explain the reason for any burden hour changes or adjustments reported in Items 13 or 14.**

One reason for the change/adjustments is due to the 2023 GS Payscale for GS9/5, which is now \$35.27 per hour. There is also a change in the burden calculation. The time burden decreased from 610 hours to 296 hours.

**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.**

NCA does not intend to publish these data.

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

NCA will include the expiration date on all forms.

**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.