

SUPPORTING STATEMENT A
Presidential Memorial Certificate
OMB Control Number: 2900-0567

Note: Summary of Changes from Previously Approved Collection

- Presidential Memorial Certificate – There is no change in the title.
- There are no major revisions to instruments of collection.
- This ICR type is an extension as there are no burden changes.
- There were no comments 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 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 veteran's 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 (NCA) or Arlington National Cemetery of persons committing Federal or State capital crimes.

VA is renewing information collection 2900-0567, VA Form 40-0247, Presidential Memorial Certificate Request Form. The form is used by members of the public to request a Presidential Memorial Certificate. The information will be used to confirm that the recipient's eligibility meets the criteria for requesting presidential memorial certificates.

- 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 NCA, Memorial Products Service, Presidential Memorial Certificates Unit via three primary delivery sources. Those are via United States Postal Service (USPS) mailed directly to the PMC Unit, sent via a toll free 800-line fax service, or sent via access.va.gov. 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, fax, or submit electronically via access.va.gov.

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. NCA is developing an electronic submission method in addition to the current ways to submit the form. As such, NCA is revising the form to account for electronic submissions. The respondents' burden to complete the form both online 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.

NCA collects data for the PMC program as it 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 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 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 May 5, 2023 (Volume 88, Number 87, Page 29179). 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.**

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 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:

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:

	Number of Respondents Annually	Number of Responses	Number of Minutes per Response	Total Minutes	Total Number of Annual Burden Hours
Request Form	125,000	1	3	375,000	6,250 hours

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.

This request covers only one form, the Presidential Memorial Certificate Request form.

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.

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 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 mean hourly wage is \$29.76 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website:
https://www.bls.gov/oes/2022/may/oes_nat.htm#00-0000

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. NCA estimates that the cost to each respondent would be \$1.49 ($\$29.76 \text{ mean hourly wage} \times 0.05 \text{ (3-minute time burden)} = \1.49). NCA estimates the total cost to all respondents to be \$186,000.00 (125,000 respondents \times \$1.49 cost to each respondent).

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).

There are no operation or maintenance costs for respondents. 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 Federal 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.

NCA estimates review by five NCA program support assistants at GS-7/1 to be \$111,666.67. NCA multiplies 125,000 responses by 0.5 (30 minutes) to equal 62,500 minutes. NCA divides 62,500 minutes by 60 minutes to get the burden hours for review (1,041.67 hours). Next, NCA multiplies 1,041.67 hours by the hourly rate of a GS-7/1 (\$21.44) to reach the review cost of \$22,333.33. Then,

NCA multiplies the review cost of \$22,333.33 by five support assistants to calculate the GS-7/1 review cost of \$111,666.67.

NCA estimates review by a NCA program support clerk at GS-4/1 to be \$8,057.29. NCA multiplies 125,000 responses by 0.25 (15 minutes) to equal 31,250 minutes. NCA divides 31,250 minutes by 60 minutes to get the burden hours for review (520.83 hours). Next, NCA multiplies 520.83 hours by the hourly rate of a GS-4/1 (\$15.47) to reach the review cost of \$8,057.29.

NCA estimates review by a lead program specialist at GS-9/1 to be \$13,656.25. NCA multiplies 125,000 responses by 0.25 (15 minutes) to equal 31,250 minutes. NCA divides 31,250 minutes by 60 minutes to get the burden hours for review (520.83 hours). Next, NCA multiplies 520.83 hours by the hourly rate of a GS-9/1 (\$26.22) to reach the review cost of \$13,656.25.

NCA estimates review by a supervisor at GS-12/1 to be \$19,807.29. NCA multiplies 125,000 responses by 0.25 (15 minutes) to equal 31,250 minutes. NCA divides 31,250 minutes by 60 minutes to get the burden hours for review (520.83 hours). Next, NCA multiplies 520.83 hours by the hourly rate of a GS-12/1 (\$38.03) to reach the review cost of \$19,807.29.

The total annualized cost burden to the Federal Government is \$153,187.50.

Source (2022 General Schedule):

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/RUS_h.pdf

1. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.

NCA adjusted the burden estimates (such as mean hourly wage, total cost to respondents, hourly wage for respondents, and total cost to the Federal Government) since the previously submitted information collection. The hourly rate for one NCA employee to review forms was adjusted to reflect current general schedule pay rates set by the Office of Personnel Management for a GS-4 employee.

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.

NCA does not intend to publish these data.

3. 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.

- 4. 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.