

SUPPORTING STATEMENT A
Gravesite Reservation Questionnaire (2-Year)
OMB Control Number: 2900-0546

Note: Summary of Changes from Previously Approved Collection

- Gravesite Reservation Questionnaire – 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 hour changes, no material changes to the instructions, no changes in frequency of collection, and no changes to the use of information.
- 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.

From the late 1940s until January 1962, the Department of the Army allowed active-duty servicepersons and surviving spouses of deceased veterans interred in national cemeteries to reserve gravesites for their interments. Recurring gravesite reservation contact is necessary as some reservees become ineligible, are buried elsewhere, or cancel their reservations; therefore, reserved gravesites would exist forever without use. VA FL 40-40 is used for this program to ensure that veterans upon their death would have space for themselves and eligible family members in national cemeteries.

Legal authority for this information collection is under statute(s): US Code 38, USC 2402, para 6, Gravesite Reservation; Public Law 108 – 183, Section 502, Eligibility of Surviving Spouses Who Remarry for Burial in National Cemeteries.

Currently, the Gravesite Reservation Program utilizes FL 40-40 only for veterans and eligible persons to retain reserved space in a national cemetery. With this form, VA can maintain an accurate accounting of who is reserved in a particular cemetery and who does not wish to hold their previously claimed plot.

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 questionnaire is mailed biennially to the eligible dependents of decedents interred at our national cemeteries when that decedent is entitled to a reserve set-aside grave. Respondents must read the instructions carefully and fill out a form with a minimum of 11 but up to 12 fields. The instruction sheet contains a minimum of 279 words and assuming an average reading speed of 238 words a minute can take readers between 1.4 and 2.2 minutes. Once the form is completed the respondent must mail the form with the included postage-paid envelope to the national cemetery. The respondent must then mail this form out by taking it to either a mailbox, the post office, or having it picked up by the letter carrier.

The questionnaire may have associated psychological costs as the respondent is being asked to answer questions related to a deceased loved one which may bring up grief or other feelings associated with loss.

The Questionnaire is necessary to assure unneeded gravesite reservations do not go unused. Some holders become ineligible, are buried elsewhere, or simply wish to cancel a gravesite reservation. If such a questionnaire were not performed, unused reservations would exist needlessly. Other veterans or eligible persons may use these spaces. The questionnaire provides full knowledge of gravesite availability.

- 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.**

Automated technology is required to prepare questionnaires and for storage and retrieval of information upon receipt.

- 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.**

The biennial questionnaire is made to determine if the holder desires to continue the gravesite reservation. If the information collection were conducted less frequently, the database would lack credibility.

- 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.**

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 43419). 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-day and 30-day Federal Register notices. Respondents are asked to provide feedback on the FL 40-40 itself which states "Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the VA Clearance Officer (005R1B), 810 Vermont Avenue, NW, Washington, D.C., 20420."

- 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.**

The information collection conforms to the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein. The records are maintained in the system identified as (42VA41), "Veterans and Dependents National Cemetery Interment Records-VA," as published in the Federal Register (#40 FR38095), August 26, 1995.

- 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:

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

- Number of Respondents: 25,000
- Frequency of Response: 1
- Annual Burden Hours: 4,167
- Estimated Completion Time: 10 min

	Number of Respondents	Number of Responses	Number of Minutes/Response	Total Minutes	Total Number of Hours
Form Letter 40-40	25,000	1	10	250,000	4,166.67 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.

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 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 May 2022, U.S. Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, the mean hourly wage is \$29.76. Therefore, the cost to the respondent is \$124,000.10 (4,166.67 burden hours × \$29.76 per hour) All Occupations link: 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.

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).

There are no operation or maintenance costs for respondents. There is no requirement for record keeping.

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.

Estimated Annual Costs to the Federal Government: \$38,666.67

a. Forms are available on the VA inter/intranet forms websites.

Web Services Support, 2 IT Specialists, GS-14/4 (\$61.35 hourly rate):
4,166.67 burden hours ÷ 60 min. = 69.44 hrs. × \$61.35 = \$4,260.42
× 2 = \$8,520.83

VA Forms Manager, GS-13/5 (\$53.49 hourly rate):
4,166.67 burden hours ÷ 60 min. = 69.44 hrs. × \$53.49 = \$3,714.58

b. Processing/Analyzing costs:

2 Program Specialists, GS-13/5 (\$53.49 hourly rate):
4,166.67 burden hours ÷ 60 min. = 69.44 hrs. × \$53.49 = \$3,714.58
× 2 = \$7,429.17

3 Program Analysts at GS-9/1 (\$27.37 hourly rate): Burial Operations Support
4,166.67 burden hours ÷ 60 min. = 69.44 hrs. × \$27.37 = \$1,900.69 × 3 = \$5,702.08

c. Print Reproduction (overhead): \$13,300

Source: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf

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

NCA adjusted the burden estimates (such as mean hourly wage, total cost to respondents, hourly wage for program analysts, and estimated annual cost to Government) since the previously submitted information collection. For example, NCA adjusted the average hourly rate for three program analysts at GS-9 Step 1 to reflect current general schedule pay rates set by the Office of Personnel Management (OPM).

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.

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.

There are no exceptions.