

## SUPPORTING STATEMENT - PART A

Pay Now Enter Info Page – 2900-0663

### Summary of Changes from Previously Approved Collection

- No Changes to the Collection

#### 1. Need for the Information Collection

VA collects debts as authorized by 31 U.S.C. § 3711 (2006) and 38 U.S.C. §§501, 5314 (2006). Section 3711(d) of title 31 and sections 501(a) and 5314(d) of title 38 authorize the Secretary of Veterans Affairs (VA) to act under regulations he prescribes as well as the Federal Claims Collection Standards, 31 C.F.R., pts. 900 – 904. VA collection standards at 38 C.F.R. §§ 1.900 - 1.953 (2007), as revised at 69 Fed. Reg. 62188 – 62201 (October 25, 2004), were issued pursuant to the Federal Claims Collection Standards. Sections 1.904 and 1.910 of the VA standards call for collection in the form of money (with limited exception) and for aggressive collection action, respectively.

This Web initiative was taken in the spirit of the President’s Management Agenda and the E-Government Act of 2002, Pub. L. no. 107-347 as codified at 44 U.S.C. Ch. 36. Debt Management Center (DMC) believes its Web-based payment system has proven to be a convenience for individuals owing debts to VA (see paragraphs 12 and 13).

#### 2. Use of the Information

Entry of the data on the Pay Now Enter Info Page (initiated at the VA portal, [www.pay.va.gov](http://www.pay.va.gov)) in combination with the respondent verifying the information by clicking “Next” redirects the respondent to a Department of the Treasury Web site (Pay.gov) where credit card payments or direct debits (Automated Clearing House – ACH) can be transacted.

The information entered by the respondent on the VA Pay Now Enter Info Page is not, initially, sent to the Treasury Web site. Instead, the entries are stored on a VA Web server and an Agency I.D. and (anonymous) Tracking I.D. are transmitted to the Treasury server. When the Pay.gov site sends an electronic acknowledgment, the VA Web server sends 19 data elements to Pay.gov. One of the 19 is the respondent’s name entered on the Pay Now Info Page. The data elements returned to Pay.gov are generated to synchronize the further exchange of data and are not personal to the respondent, except his or her name.

After completion of credit card or direct debit transaction, transaction data is returned to the VA Web server along with the Tracking I.D. The tracking I.D. is used to identify the data set created by the initial entries on the Pay Now Enter Info Page and, in turn, the VA

account receivable record corresponding to the person who made a credit card or direct debit payment. At the end of the online payment process, a report of the transaction is generated with a combination of data elements from both the Pay Now Info Page and Treasury's Pay.gov site (neither credit card nor financial institution account information is returned to VA from the Treasury site). Since the initial approval of the Pay Now Enter Info Page on July 15, 2005, programming was installed to automatically update individual accounts receivable records for credit card and direct debit (ACH) transactions initiated on the Pay Now Enter Info Page.

3. Use of Information Technology

This collection is conducted on the Internet. Respondents fill in data in their computer terminals and are automatically redirected to the Department of the Treasury's Pay.gov Web site. At the conclusion of the transaction, the respondent receives a message confirming its success or failure. The estimated burden time for completing the VA Web form is 10 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the entries on the web form. The time would be considerably less should the respondent have a copy of a letter sent to him or her by DMC readily available.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

DMC is participating in a program of online collections in cooperation with the Department of the Treasury's Pay.gov initiative and has demonstrated substantial amounts can be collected online based on experience since initial approval of the Web form. The convenience factor is significant for both the debtor and the Government. In the first full fiscal year the collection site was available to veterans and dependent beneficiaries, they used the site to pay more than \$7.4 million. In FY 2013, \$70.8 million was collected.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection was published on Monday, July 7, 2023. The 60-Day FRN citation is Vol. 88, No. 129 FRN 43421.

There have been no public comments to the 60-Day FRN as of Tuesday September 5, 2023.

The 30-Day FRN for the collection will be published upon completion of the 60-Day FRN.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission currently.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

The collection instrument does require a Privacy Act Statement (PAS) which can be located and provided to the respondent at the bottom of the [PayVA webpage](#) once the respondent select "Pay Online" button. The Social Security Number (SSN) is still required on the VA Form 5655, Financial Status Report, as an identifier and until there is another identifier to replace the SSN.

The information collection does require a System of Record Notice (SORN), PayVA (QCR) Debt Management Center System of Records Notice which is currently published and can be found on [FRN citation is 85 FRN 84123](#).

The PIA, PayVA, is undergoing changes will provide a draft with this package for OMB's review when it becomes available.

POLICIES AND PRACTICES FOR RETENTION AND DISPOSAL OF RECORDS:

Microfilm and microfiche are retained in metal cabinets in DMC for 25 years. CARS records are retained until termination of debt collection (payment in full, write off, compromise or waiver). All other automated storage media are retained and disposed of in accordance with disposition authorization approved by the Archivist of the United States.

DMC generally forwards all substantive paper documents to VA regional offices, health care facilities and CHAMPVA Center for storage in claims files, patient treatment files, imaging systems or loan files. Those documents are retained and disposed of in accordance with the appropriate system of records.

Information provided to HUD for CAIVRS is stored on magnetic tape. The tapes are returned to VA for updating each month. HUD does not keep separate copies of the tapes. Information provided to the Department of the Treasury for the Treasury Offset Program is transferred electronically and stored by Treasury on magnetic media.

In the case of CARS/CAROLS there are no physical items, only electronic. The electronic records being kept on CARS/CAROLS change daily and exist until the debt is otherwise settled. There is no history currently being kept by this system and no archiving.

#### 11. Sensitive Questions

There are questions of a sensitive nature, such as, the following:

- First and Last Name
- Collection of Social Security Number
- Financial / Banking Information
- Telephone Number

#### 12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

##### 1) Collection Instrument(s)

[Pay Now Enter Info Page]

- a) Number of Respondents: 187,567
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 187,567
  - d) Response Time: 10 minutes (.166... Hours)
  - e) Respondent Burden Hours: 31,261 hours
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- 2) Total Submission Burden (Summation or average based on collection)
    - a) Total Number of Respondents: 187,567

- b) Total Number of Annual Responses: 187,567
- c) Total Respondent Burden Hours: 31,261 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
[Pay Now Enter Info Page]
  - a) Number of Total Annual Responses: 187,567
  - b) Response Time: 10 minutes (.166...)
  - c) Respondent Hourly Wage: \$15.00
  - d) Labor Burden per Response (P: B multiplied by C): \$2.50
  - e) Total Labor Burden \$468,917.50
  
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 187,567
  - b) Total Labor Burden: \$468,917.50

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instrument(s)  
[Pay Now Enter Info Page]
  - a) Number of Total Annual Responses: 187,567
  - b) Processing Time per Response: 10 minutes (.166...)
  - c) Hourly Wage of Worker(s) Processing Responses: \$29.74
  - d) Cost to Process Each Response: \$4.95
  - e) Total Cost to Process Responses: \$928,456.65
  
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 187,567
  - b) Total Labor Burden: \$928,456.65

The hourly rate of \$29.74 is based on the Office of Personnel Management General Schedule (GS) 2023 pay tables for the mean pay grade of the GS 8, step 7 employees performing the task which can be found at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf).

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$928,456.65
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$928,456.65

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

VA is requesting approval to omit the display of the expiration date of the OMB approval on the collection instrument because the collection is an online webpage that will be constantly used daily which negates the need for the form to expire.

An expiration date requirement would delay Department action on the benefit being sought or right being exercised. VA also seeks to minimize the costs to itself for collecting, processing, and using the information disclosed. For the reasons stated, VA continues its request for an exemption to the requirement to display an expiration date for collection 2900-0663.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.