

## SUPPORTING STATEMENT A

### VA-FSC VENDOR FILE REQUEST FORM - VA FORM 10091

OMB Control Number 2900-0846

#### **Summary of Changes from Previously Approved Collection:**

- VA Form 10091 has undergone minor revisions, which were approved by OMB in Aug 2023.
- The program is encouraging increased use and submission of the web-based version of VA Form 10091 and limited use of the paper or pdf version.
- The program does not anticipate an increase in the annual responses or burden hours.
- No comments were received 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 authorizing statutes for this data collection are Debt Collection Improvement Act of 1996 (31 U.S.C. §3701 and Public Law 104-134, Section 31001); The Paperwork Reduction Act of 1995 (44 U.S.C. § 3501); The Federal Data Quality Act (also known as the Information Quality Act) of 2000 (Public Law 106-555, Section 515) and The 21st Century Integrated Digital Experience Act of 2019 (Public Law 115-336).

In 1987, Treasury implemented several initiatives to encourage agencies to convert their vendor and miscellaneous payment activity from checks to the Automated Clearing House (ACH) payments. By 1996, the Debt Collection Improvement Act (DCIA) mandated the use of electronic funds transfer (EFT) for federal payments. In order to comply with these federal requirements, the VA and other Federal Agencies used OMB #1510-0056 / Standard Form 3881 (SF3881) to collect the essential payment data from vendors (i.e., Name, Address, SSN or Tax ID, Financial Institution, Routing and Bank Account Numbers) to establish payment files. However, because SF 3881 lacked the necessary information fields to communicate the type of Vendor record required (i.e., commercial, individual, veteran, employee, etc.) the Department of Veterans Affairs – Financial Services Center (VA-FSC) required all SF3881 submissions to have an accompanying Vendorizing Cover Sheet included to ensure proper document processing.

The Paperwork Reduction Act (PRA) is intended to “minimize the burden and maximize the utility of information created, collected, maintained, used, disseminated, and retained by or for the Federal Government”. The Federal Data Quality Act (DQA), also known as the Information Quality Act (IQA) requires federal agencies to issue guidelines to ensure the "quality, objectivity, utility, and integrity of information" disseminated by Federal agencies and to provide persons about whom they maintain information a means of correcting that information. The VA-FSC Vendor File Request Form – VA Form 10091, under OMB control number 2900-0846, was created and implemented in 2015 to comply with DCIA, PRA, and DQA by streamlining the data required to establish a vendor record from multiple sources into a single form.

Most recently, the 21<sup>st</sup> Century Integrated Digital Experience Act (21<sup>st</sup> Century IDEA) was summed up by the bill’s sponsor, Representative Ro Khanna, by saying, “Government exists to serve citizens, and this bill ensures government leverages available technology to provide cohesive, user-friendly online service that people around this country expect and deserve.” Specifically, the Act requires all executive branch agencies

to modernize their websites, digitize services and forms, accelerate the use of e-signatures, improve customer experiences, and standardize and transition to centralized shared services.

Therefore, VA now seeks a regular three-year renewal of the OMB PRA clearance for the paper and the web-based versions of VA Form 10091. While either version will be accepted to gather essential payment data from vendors, VA-FSC will be marketing the web-based form to customers, with an internal goal to “fully transition to the web form” in FY 2024.

**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 paper- and web-based versions of VA Form 10091 will be used throughout the VA to gather essential payment data from vendors to establish or update vendor records in order to process electronic payments.

**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.**

VA Form 10091 requests previously have been submitted almost exclusively by Fax. The current method requires the user to obtain a blank form, fill it out in ink, and fax it to the Nationwide Vendor File Division.

The VA-FSC has developed a secure, web-based form which can be retrieved and completed using any device with internet access. This method improves the accuracy of enrollment information; reduces the burden and costs associated with the formal enrollment process, and expedites the Vendorizing / Payment process.

**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 on the VA Form 10091 is collected to establish a vendor payment file and effect payments electronically. There is no other similar information that can be used to effect payments electronically.

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

There is no correlation between the size of the business and amount of data required and or the amount of time required to complete the VA Form 10091. This collection of information will have no significant effect on small businesses and other small 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 collection of this information is usually a one-time collection from each vendor and cannot be collected less frequently. If the collection is not conducted, then Federal agencies will be unable to comply DCIA, PRA, DQA, or 21<sup>st</sup> Century IDEA laws governing the use of the form(s) and the data elements on them.

**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.**

The collection of this information is conducted in a manner that is consistent with the guidelines in 5CFR1320.6.

**8. a. If applicable, provide a copy and identify the date and page number of publications 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 60-day notice of Proposed Information Collection Activity was published in the Federal Register on September 25, 2023 (Vol. 88, No. 184, pages 65775-65776). VA received no comments in response to this notice.

The 30-day notice of Agency Information Collection Activity Under OMB review was published in the Federal Register on December 4, 2023 (Vol. 88, No. 231, pages 84184-84185).

**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.**

VA Form 10091 was developed in response to feedback received from customers (other VA agencies, Veterans, Caregivers, Medical Professionals, etc.) who were frustrated with the predecessor form (SF3881) to establish Vendor Payment Records. The VA-FSC values our customer's feedback and seeks continuous improvement of the services provided. Therefore, the VA-FSC will continue to consult with our various customer representatives to ensure the optimization of both versions (paper and web) of the form.

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

No payment is made to collect this 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.**

The information collected is confidential in nature. VA Form 10091 contains a Privacy Act statement which reads, "The following information is provided to comply with the Privacy Act of 1974 (P.L. 93-579). All information collected on this form is required under the provisions of 31 U.S.C. 3322 and 31 CFR 210. This information will be used by the Treasury Department to transmit payment data, by electronic means to vendor's financial institution. Failure to provide the requested information may delay or prevent the receipt of payments through the Automated Clearing House Payment System".

**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 that are 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: 150,000 x frequency of response: 1 x .25 (15 minutes) = 37,500 annual burden hours.

The hour burden is estimated based on the time it takes to provide this agency the required fields as defined in the Instruction on p. 2-3 of VA Form 10091 – “Section II: Payee/Vendor Information”, Section III: EFT/ACH (Required IAW 31 CFR Part 208) and Section IV: Authorized Representative”.

From historical records, we estimate that annually 150,000 businesses, employees, Veterans, etc., will submit a VA Form 10091 to add, modify, delete a Vendor File. Each submission, regardless of whether it is a paper or web-form submission, is expected to take 15 minutes to respond.

Instrument	# of Respondents	# of Responses	# of Minutes	Divided by 60	# of Hours
VA Form 10091	150,000	1	15	60	37,500
<b>Annual Avg</b>	<b>150,000</b>	<b>1</b>	<b>15</b>	<b>60</b>	<b>37,500 hrs</b>

**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.**

Not applicable.

**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.**

VA 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. In accordance with the latest available BLS Occupational Wage Code Median Hourly (May 2021), the mean hourly wage is \$28.01 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: [May 2021 National Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/ocwage.t01.htm)

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. VA estimates the total cost to all respondents to be \$1,050,375.00 (37,500 burden hours x \$28.01 per hour).

**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 is no evidence that respondents bear any additional capital or start-up costs as a result of this information requirement. The information requested, name of financial institution, RTN, and account number, is information that is readily available and often requested by other non-government entities doing business with the vendors. No operational or maintenance cost is associated with the collection of this information. There are no associated record keeping 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.**

Estimates of annualized costs to the Federal Government is **\$190,200**

Processing information from 150,000 forms x 3 minutes  
(.05) x \$25.36 per hour for government employees (GS7, Step 5, "2023 Rest of US rate")  
(or 150,000 x .05 x \$25.36)

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

VA does not project any changes since our last submission

**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.**

Collected information will not be published.

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

VA does not seek to omit the expiration date.

**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.