SUPPORTING STATEMENT

VA FORM SGLV 8286A

SERVICEMEMBERS’ GROUP LIFE INSURANCE – SPOUSE COVERAGE (FSGLI) ELECTION AND CERTIFICATE FORM

2900-NEW

**Summary of a New Collection**

* This ICR is being submitted as a “New Collection” since it has not previously been used or sponsored by the agency.
* The information collection request (ICR) package includes the new SGLV 8286A form, Service Members’ Group Life Insurance - Spouse Coverage (FSGLI) Election and Certification.
* No comments were received in response to the Federal Register notice.

1. **Justification** 
   1. **Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

Family Servicemembers' Group Life Insurance (FSGLI) provides insurance coverage to spouses of Servicemember’s Group Life Insurance (SGLI) insured individuals. SGLI and all associated insurance programs are VA benefits. The SGLV 8286A form is used by Service Members and their spouses when the Service Member is unable to access their Servicemembers Group Life Insurance Online Enrollment System (SOES) account to electronically elect, increase, decrease or decline coverage. If the member is increasing or electing coverage on their spouse after prior declination or reduction and the spouse has health issues, the member’s uniformed service reviews the request and sends to the primary insurer for the SGLI program, The Prudential Insurance Company of America (Prudential), through its’ Office of Servicemembers’ Group Life Insurance (OSGLI), to underwrite and make a decision on coverage. This form ensures members, and their spouses can continue to use the form to manage their FSGLI spousal benefits.

* 1. **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 collected is used by the uniformed services to document changes in FSGLI spousal coverage where access to the SOES system is unavailable. If medical review is required for elections or increases in spousal OSGLI to determine if a member’s spouse is eligible to receive FSGLI spousal, benefit, the uniformed services transmit that information to OSGLI who issues decision, if the spouse is eligible or not for insurance.

* 1. **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 SGLV 8286A is available online on the VA Life Insurance website in a fillable electronic format. It is only used when the electronic election system, SOES is not accessible by service members, which is a very limited number of service members. Allowing members and their spouses to complete the form digitally, reduces the burden on the member or spouse because they can save the form digitally and send electronically to their uniformed service’s adjudication office.

* 1. **Describe efforts to identify duplication. Show specifically why all 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 uniformed service or VA records. Similar information is not available elsewhere.

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

The information does not involve any small businesses.

* 1. **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 the collection does not take place, then members and their spouses, who do not have access to SOES, will not be able to elect, decline, increase or decrease spousal coverage that they are legally eligible to receive.

* 1. **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 special circumstances requiring that the collection of information be conducted in a manner inconsistent with the guidelines in 5 CFR Section 1320.6.

* 1. **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 sponsor in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-Day Federal Register Notice (FRN) for the collection published on October 3, 2023. The 60-Day FRN citation is Volume Number 88, FRN 190, Pages 68287-68288. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice (FRN) for the collection published on Thursday, December 7, 2023. the 30-Day FRN citation is volume number 88, FRN 234, Page 85361.

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

* 1. **Explain any decision to provide any payment or gift to respondents.**

The information collected is supplied by the respondent. No remuneration is made.

* 1. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statue, regulation, or agency policy.**

The information collection conforms with the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein. The records are maintained in the system identified as 36VA29, “Veterans of Uniformed Services Personnel Programs of U.S. Government” as contained in the Privacy Act Issuances, 1993 Compilation.

* 1. **Provide additional justification for any questions of a sensitive nature, 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 questions about a Service member’s spouse’s health to determine whether their application for coverage needs to be underwritten. The spouse must complete the section of the form related to their medical issue and both the spouse and Service member must attest to truthfulness of the statement. The form also explains that the information is being used in relation to their request for insurance.

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

1. Number of Respondents: 1600
2. Frequency of Response: One time
3. Annual Burden Hours: 267 hours
4. Estimated Completion Time: 10 minutes
5. The respondent population for SGLV 8286A is comprised of Service Members and their spouses.
6. The Bureau of Labor Statistics (B:S) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weakly earnings of full-time wage and salary workers are $1,190.40. Assuming a forty (40) hour work week, 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/current/oes_nat.htm>, May 2022).

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.  VBA estimates the total cost to all respondents to be **$7,946.00** (267 burden hours x $29.76 per hour).

* 1. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

This submission does not involve any record keeping costs.

* 1. **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.**

Estimated Costs to the Federal Government:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Grade | Step | Burden Time | Fraction of Hour | Hourly Rate | Cost Per Response | Total Responses | Total |
| 9 | 3 | 10 | 0.17 | $25.06 | $4.26 | 1600 | $6,816.00 |
| Overhead at 100% Salary | | | | | | | $6,816.00 |
| 5 | 3 | 2 | 0.03 | $16.54 | $0.50 | 1600 | $800.00 |
| Overhead at 100% Salary | | | | | | | $800.00 |
| 4 | 3 | 2 | 0.03 | $14.78 | $0.44 | 1600 | $704.00 |
| Overhead at 100% Salary | | | | | | | $704.00 |
|  | | | | | | |  |
| Processing / Analyzing Costs | | | | | | | $16,640.00 |
| Printing and Production Cost | | | | | | | $54.00 |
| Total Cost to Government | | | | | | | $16,694.00 |

Note: The hourly wage information above is based on the hourly 2023 General Schedule (Base) Pay (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/GS_h.pdf>).  This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

* 1. **Explain the reason for any program changes or adjustments reported in Items 13 or 14 of OMB 83-I.**

There is no change in respondent burden.

* 1. **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.**

The information is collected for insurance purposes only and there are no plans for publication.

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

Not applicable.

* 1. **Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.**

This submission does not contain any exceptions to the certification statement.

**PART B**

**B. Collection of Information Employing Statistical Methods**

This collection of information does not employ statistical methods.