

SUPPORTING STATEMENT A  
**VA Form 40-1330UP,**  
**Claim for Commemorative Urn and Plaque for Veterans' Remains Not Interred**

- *Title: Claim for Commemorative Urn and Plaque for Veterans' Remains Not Interred*
- *Revisions? I added one new IC in "IC List" since this ICR type is a new collection.*
- *This ICR is being submitted as a new collection.*
- *Received comments on the 60-day FRN? VA did not receive comments on the 60-day FRN since this is a new collection associated with a proposed rule.*

**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 VA Form 40-1330UP is used by the public to apply for a Government-provided commemorative plaque or urn to memorialize eligible Veterans in accordance with 38 U.S.C. § 2306. It is the source of information used to evaluate the applicant's claim for the benefit. The information is requested under 38 CFR § 38.634 and represents the minimum requirements by VA to properly determine the Veteran's eligibility for, and entitlement to, this benefit.

- 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.**

Currently, information on the forms is transcribed by a case manager to an ADP database and processed through a specially designed Automated Monument Application System by our case managers. The application is evaluated for accuracy and validity, and a case master record is established. The application will result in the provision of a plaque or urn or denial based on the Veteran's eligibility.

- 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 forms will be available via the VA website. Applicants can submit the claim by mail or through VA's secured electronic submission system, QuickSubmit. VA use QuickSubmit to receive forms and documents from claimants.

- 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.**

No duplication is involved. The information is not available from an alternate source.

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

This information collection 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.**

Since this information is on a “one time” basis it is not possible to reduce the frequency of this request.

**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.**

**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.**

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**8.b. Describe efforts made 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.**

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

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

There are no payments made or gifts given 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 48VA40B, Veterans (Deceased) Headstone or Marker Records – VA, as published on August 26, 1975, as Federal Register citation 40FR38095.

**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.**

The personal information asked on these forms is necessary for statistical data gathering, targeted outreach and utilization trend analysis and to better serve Veterans and for the effective delivery of 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 in order to better serve Veterans who may not be aware of our benefits and services. The applicant is informed that the information will be used for statistical purposes only.

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

This is a new application for a new benefit. NCA estimates approximately 1,684 claims per year. NCA estimates a routine request for a plaque or urn will average 10 minutes unless there are complications. Therefore, NCA estimates an annual burden of 280.6667 hours.

VA 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 BLS National Occupational Employment and Wage Estimates, the mean hourly wage is \$29.76 based on the BLS wage code – "00-0000 All Occupations."

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 the total cost to all respondents to be \$8,352.64 (280.6667 burden hours × \$29.76 mean hourly wage = \$8,352.64).

**Source:** May 2022 Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, Code 00-0000, All Occupations:  
[https://www.bls.gov/oes/2022/may/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/2022/may/oes_nat.htm#00-0000)

**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).**

This submission does not involve any recordkeeping costs. There are no capital or start-up costs. There are no operational or maintenance costs and no cost associated with the purchase of service or equipment.

**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.**

The processing of applications will be handled within the existing processes for applications for headstones, markers, and medallions. NCA estimates the annual burden to the Government for review of reimbursement forms as follows:

NCA estimates review by an NCSO employee<sup>1</sup> at GS-7/5 to be (1,684 applications × 3 minutes per case = 5,052 minutes. NCA divides 5,052 minutes by 60 minutes to get the total burden hours for application review (84.2 hours). Then, NCA multiplies 84.2 hours by the hourly rate for a GS-7/5 (\$25.92) to reach the total review cost of \$2,182.47).

Contract Support Functions (Memorial Products Service [MPS]) has entered into an Inter-Agency Agreement with the Veterans Benefits Administration for scanning and mailing operations at no cost.

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

This is a new collection.

**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.**

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<sup>1</sup> Source (2023 General Schedule): St. Louis Area (NCSO employees)

[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/SL\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/SL_h.pdf)

The information collection is not for publication or tabulation use. The results of the information collection are not for publication or used as a statistical report.

**17. If seeking approval to not display 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.**

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