Supporting Statement - Part A

<u>APPLICATION FOR ORDINARY LIFE INSURANCE AGE 65 & 70</u> Control #2900-0166

Summary of Changes:

- Title: Application for Ordinary Life Insurance Age 65 & 70, VA Form 29-8485 and 29-8485a.
- This ICR is being submitted as an "Extension" since there are no changes to the burden or the information collection instruments.
- No changes have been made to this form.
- No comments were received during the 60-Day comment period.

1. Need for the Information Collection

These forms are used by the policyholder to apply for replacement insurance for Modified Life Reduced at Age 65 and 70. The information is required by law, 38 U.S.C. Section 1904. The expiration date is being added to the forms.

2. Use of the Information

The information collected on the forms are used by the Department of Veterans Affairs (VA) to initiate the granting of coverage for which applied.

3. <u>Use of Information Technology</u>

VA Forms 29-8700 a-e and 29-8701 a-e are on the Xerox 9700. VA Forms 29-8485 and 29-8485a are available on the One-VA web site in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of this form. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.

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4. Non-Duplication

The information is not contained in any other VA records. Similar information is not available elsewhere.

5. Burden on Small Businesses

The information does not involve any small businesses.

6. Less Frequent Collection

The forms are designed for use by the insurance activity to determine the insured's eligibility for the insurance. The collection is generally conducted only once.

7. Paperwork Reduction Act Guidelines

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.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, Jun 14, 2024. The 60-Day FRN citation is Vol. 89 FRN 50666.

No comments were received during the 60-Day comment period.

A 30-Day Federal Register Notice for the collection published on Friday, August 30, 2024. The 30-Day FRN citation is 89 FRN 70695.

Part B: CONSULTATION

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

9. Gifts or Payment

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

10. Confidentiality

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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.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

- a. Number of Respondents is estimated at 15,400 per year.
- b. Frequency of Response is On occasion
- c. Annual burden hours are 1,284 hours.
- d. The estimated completion time for this form is 5 minutes.
- e. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used 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 latest available BLS data, the mean weakly earnings of full-time wage and salary workers are \$1,259.20. Assuming a forty (40) hour work week, the mean hourly wage is \$31.48 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 2023).

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 \$40,420 (1,284 burden hours x \$31.48 per hour).

13. Respondent Costs Other Than Burden Hour Costs

This submission does not involve any record keeping costs.

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14. Costs to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
9	3	5	.08	\$26.24	2.10	15,400	\$32,340.00
Overhead at 100% Salary							\$32,340.00
5	3	2	0.03	\$17.31	.52	15,400	\$8,008.00
Overhead at 100% Salary							\$8,008.00
4	3	2	0.03	\$15.48	.46	15,400	\$7,084.00
Overhead at 100% Salary							\$7,084.00
Processing / Analyzing Costs							\$94,864.00
Printing and Production Cost							\$54.00
Total Cost to Government							\$94, 918.00

Overhead costs are 100% of salary and are the same as the wage listed above and the amounts are included in the total.

Printing and production costs approximates the cost of printing this information collection per year. (Processing/Analyzing Cost total divided by \$54).

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay (<u>Pay & Leave : Salaries & Wages - OPM.gov</u>). 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.

15. Reason for Change in Burden

There is no change in respondent burden.

16. Publication of Results

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

17. Non-Display of OMB Expiration Date

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We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

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