SUPPORTING STATEMENT - PART A

VA FORM 29-1546 Application for Cash Surrender or Policy Loan VA FORM 29-1546e (DocuSign) Application for Cash Surrender 2900-0012

Summary of Changes:

- This ICR is being submitted as an "Extension" since there are no changes to the burden or the information collection instruments.
- No comments were received in response to the 60-Day Federal Register Notice.
- Title: Application for Cash Surrender or Policy Loan, VA Form 29-1546, and Application for Cash Surrender, VA Form 29-1546e (DocuSign).

1. Need for the Information Collection

These forms are used by the insured to apply for cash surrender value or policy loan on his/her insurance. The information on these forms are required by law, 38 USC 1906 and 1944, 38 CFR 6.115, 6.116, 6.117, 8.27, 6.100, 6.101 and 8.28.

2. Use of the Information

The data collected on these forms are used by the Department of Veterans Affairs (VA) to indicate the processing of the insured's request for a loan or cash surrender. These forms are being revised due to the change in law informing insureds they can no longer receive paper checks. The Treasury will only send payments by direct deposit. Additionally, Block 8 of the Loan portion of the form, the insured can inform us of how much he would like deducted from his compensation check or military retirement to reduce the loan. The expiration date has also been added to the forms.

3. Use of the Information Technology

VA Form 29-1546 is 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 the 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.

The 29-1546e is an electronic version of the 29-1546 and supports digital signature through VA approved DocuSign. This form is for Cash Surrenders only and will not be available on any VBA websites.

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

These forms are designed for use by the insured to establish his/her eligibility to obtain a loan or cash surrender.

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 for the collection published on Tuesday, September 10, 2024. The 60-Day FRN citation is Volume 89 FRN 73507.

A 30-Day Federal Register Notice for the collection published on Monday, November 18, 2024. The 30-Day FRN citation is Volume 89 FRN 90834.

Part B: CONSULTATION:

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

9. Gifts or Payment

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

10. Confidentiality

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 36VA29 Veterans and Uniformed Services Personnel Program of U.S. Government Life Insurance – VA" as contained in the Privacy Act Issuances, 2011 Compilation.

11. Sensitive Questions

There are no questions of a sensitive nature.

12. Respondent Burden and its Labor Costs

a. Number of Respondents: 29,636

b. Frequency of Response: On occasion

c. Annual Burden Hours: 4,939 hours

d. Estimated Completion Time: 10 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 (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 \$1,259.20. 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 **\$155,480** (4,939 burden hours x \$31.48 per hour).

13. Respondent Costs Other Than Burden Hour Costs

This submission does not involve any record keeping costs.

14. Costs to the Federal Government

| Grade | Step | Burden Time | Fraction of Hour | Hourly Rate | Cost Per Response | Total Responses | Total |
|-------------------------|------|----------------|---------------------|-------------|----------------------|--------------------|--------------|
| 9 | 3 | 10 | .17 | \$26.24 | \$4.46 | 29,636 | \$132,177.00 |
| Overhead at 100% Salary | | | | | | | \$132,177.00 |
| 5 | 3 | 2 | 0.03 | \$17.31 | \$0.52 | 29,636 | \$15,411.00 |
| Overhead at 100% Salary | | | | | | | \$15,411.00 |
| 4 | 3 | 2 | 0.03 | \$15.48 | \$0.46 | 29,636 | \$13,633.00 |
| Overhead at 100% Salary | | | | | | | \$13,633.00 |
| | | | | | | | |

| Processing / Analyzing Costs | \$322442.00 |
|------------------------------|--------------|
| Printing and Production Cost | \$54.00 |
| Total Cost to Government | \$322,496.00 |

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

(https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/GS h.aspx). 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

We are not seeking approval to omit the expiration date for OMB approval.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

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