

Supporting Statement - Part A

*State or Tribal Organization Application for Interment Allowance (Under 38 U.S.C. Chapter 23)
Control #2900-0565*

Summary of Changes from Currently Approved Collection

- The ICR is being submitted as a revision due to the increase in burden. The respondent burden has increased since the previous approval due to an extended plot or interment allowance benefit, which now includes Tribal organizations.
- The ICR is associated with AR69(F) – Expanded Monetary Burial Benefits.

1. Need for the Information Collection

The Department of Veterans Affairs (VA) through its Veterans Benefits Administration (VBA) administers an integrated program of benefits and services, established by law, for Veterans, service personnel, and their dependents and/or beneficiaries.

Information is requested by this form under the authority of 38 U.S.C. 2302 and 2303.

2. Use of the Information

VA Form 21P-530a is used to gather the information required to determine whether a State or Tribal Organization is eligible for interment allowances for eligible Veterans who have been buried in a State Veterans' cemetery or Tribal Trust land. Without this information, VBA would be unable to properly determine eligibility and pay benefits due to a State or Tribal Organization.

3. Use of Information Technology

VA Form 21P-530a is available on the VA Website in a fillable electronic format. The collection of information does not involve the use of automated, electronic, mechanical, or other technological collection techniques. VA does not currently have technology in place to allow for the electronic submission of this form, though VA may develop this technology in the future.

4. Non-Duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

VA Form 21P-530a is used to gather the necessary information to determine eligibility for interment allowances to State or Tribal Organizations for eligible Veterans who have been buried in a State Veterans' cemetery or Tribal Trust land. Without this information, VBA would be unable to properly determine eligibility and pay benefits due to a State or Tribal Organization.

Supporting Statement - Part A

State or Tribal Organization Application for Interment Allowance (Under 38 U.S.C. Chapter 23)
Control #2900-0565

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

The notice of Proposed Information Collection Activity was included in the proposed rule for AR69 published in the Federal Register on Monday, September 25, 2023 at 88 FR 65641. No comments were received by VA in response to this notice.

The final notice of Proposed Information Collection Activity was included in the final rule for AR69 published in the Federal Register on Wednesday, September 25, 2024 at 89 FR 78251.

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

The records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Veteran Readiness and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

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 33,594 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 2,800 hours.
- d. The estimated completion time for each 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

Supporting Statement - Part A

State or Tribal Organization Application for Interment Allowance (Under 38 U.S.C. Chapter 23)
Control #2900-0565

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 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.

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 \$88,144 (2,800 burden hours x \$31.48 per hour).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
9	3	5	0.08	\$26.24	2.187	33,594	\$ 73,458.88
Overhead at 100% Salary							\$ 73,458.88
12	3	3	0.05	\$38.05	1.903	33,594	\$ 63,912.59
Overhead at 100% Salary							\$ 63,912.59
Processing / Analyzing Costs							\$ 274,742.93
Printing and Production Cost							\$ 3,052.70
Total Cost to Government							\$ 277,795.63

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 approximate the cost of printing this information collection per year. (Processing/Analyzing Cost total divided by \$90).

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay ([Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/pay-rates/)). 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

Supporting Statement - Part A

State or Tribal Organization Application for Interment Allowance (Under 38 U.S.C. Chapter 23)
Control #2900-0565

form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

15. Reasons for Change in Burden

The burden has increased since the previous approval due to an extended plot or interment allowance benefit, which now includes Tribal organizations.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

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”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.