

SUPPORTING STATEMENT – PART A

VBA Contractor Background Investigation Request and VBA Affiliate Background Investigation Request OMB Control #2900-0915

Summary of Changes from Previously Approved Collection

VA Form 20-10276 series has been updated, to include:

- A new form has been added to this Control # which consists of VA Form 20-10276 and makes it a series.
- The new form of VA Form 20-10276a has the title of *Affiliate Background Investigation Request*.
- The burden has increased due to the addition of this new form.
- No comments were received during the 60-Day public comment period.

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 VA Forms 20-10276, VBA Contractor Background Investigation Request, and 20-10276a, VBA Affiliate Background Investigation Request. Regulatory authority is found in 5 C.F.R. Part 731.

The new form (VA Form 20-10276a) added to this collection is used to collect information from Affiliates who are applying to work/volunteer for VBA. After the collection, personnel security specialists can perform background investigation work to determine eligibility for employment and to have physical and logical access to VBA Systems.

2. Use of the Information

The respondent population for VA Forms 20-10276 and 20-10276a are composed of individuals who are Contractors or Affiliates being considered for employment or volunteering with VBA.

As such, this collection of information is used to gather the necessary information to determine eligibility for employment to VBA Systems.

3. Use of Information Technology

VA Forms 20-10276 and 20-10276a are available on the One-VA Website in a fillable electronic format. VBA is currently hosting this form on a secure server and does currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to assure data integrity.

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 Forms 20-10276 and 20-10276a are used to gather the mandatory information to determine eligibility for employment and have physical and logical access for VBA. Without this information, determination of eligibility for employment and access would not be possible.

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

A 60-Day Federal Register Notice for the collection published on Friday, October 18, 2024. The 60-Day FRN citation is 89 FRN 83953.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Monday, December 23, 2024. The 30-Day FRN citation is 89 FRN 104613.

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 Personnel Security Investigations Portal.

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 10,000 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 2,167 hours.
- d. The average estimated completion time for these forms is 13 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 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 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 \$68,217.16 (2,167 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. Costs to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
11	3	30	0.50	\$31.74	15.870	10,000	\$ 158,700.00
Overhead at 100% Salary							\$ 158,700.00
12	3	20	0.33	\$38.05	12.683	10,000	\$ 126,833.33
Overhead at 100% Salary							\$ 126,833.33
13	3	10	0.17	\$45.24	7.540	10,000	\$ 75,400.00
Overhead at 100% Salary							\$ 75,400.00

Processing / Analyzing Costs	\$ 721,866.67
Printing and Production Cost	\$ 8,020.74
Total Cost to Government	\$ 729,887.41

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 \$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/salaries-grades/)). 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

The burden has increased due to the addition of this new form.

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.