

Supporting Statement A
Request for Payment of Monetary Allowance for Outer Burial Receptacles
OMB Control Number: 2900-0941
VA Form 40-10232

Summary of Changes from Previously Approved Collection

- *Title: Request for Payment of Monetary Allowance for Outer Burial Receptacles*
- *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 final rule. The Final Rule publication citation is 89 FR 82179. The RIN is 2900-AR82.*

A. JUSTIFICATION:

1. Need for the Information Collection.

Section 2306(e) of title 38, United States Code (U.S.C.), authorizes VA to provide an outer burial receptacle for each new grave used for casketed remains in an open VA national cemetery. Section 2203 of Public Law 116-315, the "Johnny Isakson and David P. Roe, M.D Veterans Health Care and Benefits Improvement Act of 2020 amended section 2306(e) to expand VA's authority to provide outer burial receptacles to include burials in cemeteries that are the subject of a grant to a State or Tribal Organization under 38 U.S.C. 2408.

VA proposes to implement this authority in three ways: 1) by reimbursing States and Tribal Organizations for the cost of outer burial receptacles that are pre-placed as part of a new construction or expansion cemetery grant project, 2) by paying a monetary allowance to States and Tribal Organizations for the cost of outer burial receptacles that are placed at the time of interment, and 3) by paying an allowance to individuals who privately purchase an outer burial receptacle.

VA already has the information required to provide reimbursement for OBRs that are placed as part of construction, so no information collection is required to issue payment. However, to issue payment of the monetary allowance to a State or Tribal Organization for OBRs placed at the time of interment, or to an individual for a privately purchased OBR VA needs information regarding the number of burials where such graveliners were used, and proof of purchase for privately purchased outer burial receptacles.

The new form will provide the necessary information to issue payment and serves as a control tool allowing VA to ensure compliance with regulations.

2. Use of the Information.

The respondents may be Veterans, their family members, and or other personal representative assisting families at time of need for burial arrangements. Other

respondents may be officials of State or Tribal Veterans Cemeteries. The instrument is an electronic form requiring the name, address, phone, and email of the requestor, and requires the name of the cemetery, quantity being claimed for monetary payment, and supporting evidence such as a paid invoice. The form requires signature of the requestor and cemetery official. The collection includes only the minimal information required to document the number of burials where OBRs were used and the claiming organization. The respondent will email, fax, or mail the form to VA.

VA's National Cemetery Administration will use information from the form to establish entitlement to payment, certify the payment is authorized, and issue payment. VA Form 40-10232 serves as the official record documenting a request for payment of monetary allowance under 38 CFR 38.629 and becomes a permanent record. Information provided on VA Form 40-10232 provides decision-making data for approving or disapproving the payment request.

3. Use of Information Technology.

This form will be available on the VA website as a fillable PDF. Respondents will download the form and may fill it out manually or electronically. The form requires signature of the requestor and signature of an approving official. Some requestors are official representatives of States or Tribal Organizations and may use electronic signatures if capable. Individuals who use the form to request payment of the allowance for a privately purchased outer burial receptacle will provide a written signature but may scan the form for electronic submission. Forms are to be submitted through e-mail, fax or mail as preferred by the respondent.

4. Nonduplication.

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

5. Burden of Small Businesses.

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

This collection of information pertains only to State and Tribal Organizations who are recipients of grants under 38 U.S.C. 2408 and some individuals. While some Tribal Organizations may be considered small entities, the impact of this information collection is entirely beneficial as it provides a monetary allowance for outer burial receptacles associated with casketed burials in grant funded cemeteries. The collection includes only the minimal information required to document the number of burials where OBRs were used and the claiming organization. Every effort has been made to minimize the burden by keeping questions simple and to an absolute minimum. Presently, there are only 13 Tribal cemeteries where such burials would be eligible for reimbursement under 38 CFR 38.629.

6. Less Frequent Collection.

Without this collection, VA would be unable to provide payment of the monetary allowance for outer burial receptacles used in cemeteries that are the subject of a grant to a State or Tribal Organization under 38 U.S.C. 2408. Provision of outer burial receptacles for burials in such cemeteries was recently authorized by Congress. VA is proposing a quarterly collection of information which would result in quarterly payments to the State and Tribal Organizations who seek payment of the allowance. The collection could be done annually; however, that would result in an annual disbursement of the allowance payment rather than quarterly disbursements, which could be financially burdensome to the States and Tribal Organizations.

7. Paperwork Reduction Act Guidelines.

There are no special circumstances requiring that the collection be conducted in any manner described above; or inconsistent with the guidelines in 5 CFR Section 1320.6.

8. Consultation and Public Comments.

Part A: Public Notice

A proposed rule including the new collection of information was published on Tuesday, February 06, 2024. The proposed rule citation is 89 FR 8126. No comments were received during the comment period. Thus, no changes to the collection were made based on the comments.

The notice of Information Collection Activity was published in the final rule in the Federal Register on October 10, 2024. The final rule citation is 89 FR 82179. (Volume 89, Pages 82179-82182).

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 information collection conforms to the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein. The purpose for this information collection is to document request for payment of a monetary allowance for an outer burial receptacle

and verify entitlement to the payment, as authorized under 38 USC 2306(e). The information collection is voluntary for claimants seeking an allowance under this authority, which is stated on the form. The records are maintained in the system identified as 13VA047, Individuals Submitting Invoices-Vouchers for Payment and Accounting Transactional Data-VA, as published on August 31, 2023, as Federal Register citation 88 FR 60269.

11. Sensitive Questions.

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs:

Part A: Estimation of Respondent Burden

- 1) Collection Instrument: Request for Payment of Monetary Allowance for Outer Burial Receptacles, VA Form 40-10232 (Part A)
 - a. Number of Respondents: 100
 - b. Number of Responses per Respondent: 1
 - c. Number of Total Annual Responses: 100
 - d. Response Time: 15 minutes
 - e. Respondent Burden Hours: 25

- 2) Collection Instrument: Request for Payment of Monetary Allowance for Outer Burial Receptacles, VA Form 40-10232 (Part B)
 - a. Number of Respondents: 10
 - b. Number of Responses per Respondent: 4
 - c. Number of Total Annual Responses: 40
 - d. Response Time: 15 minutes
 - e. Respondent Burden Hours: 10

- 3) Total Submission Burden
 - a. Total Number of Respondents: 110
 - b. Total Number of Annual Responses: 140
 - c. Total Respondent Burden Hours: 35

Part B: Labor Cost of Respondent Burden

- 1) Collection Instrument: Request for Payment of Monetary Allowance for Outer Burial Receptacles, VA Form 40-10232 (Part A, Allowance for Privately Purchased Outer Burial Receptacles)
 - a. Number of Total Annual Responses: 100
 - b. Response Time: 15 minutes
 - c. Respondent Hourly Wage: \$31.48
 - d. Labor Burden per Response: \$7.87

 - e. Total Labor Burden: \$787.00

- 2) Collection Instrument: Request for Payment of Monetary Allowance for Outer Burial Receptacles, VA Form 40-10232 (Part B, Allowance for Outer Burial Receptacles Placed at Time of Interment)
 - a. Number of Total Annual Responses: 40
 - b. Response Time: 15 minutes
 - c. Respondent Hourly Wage: \$31.48
 - d. Labor Burden per Response: \$7.87
 - e. Total Labor Burden: \$314.80
- 3) Overall Labor Burden
 - a. Total Number of Annual Responses: 140
 - b. Total Labor Burden: \$1,101.80

The respondent hourly wage was determined using the Department of Labor Wage Website ([May 2023 National Occupational Employment and Wage Estimates \(bls.gov\)](#)) using BLS wage code – “00-0000 All Occupations.”

13. Respondent Costs Other Than Burden Hour Costs.

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

14. Cost to the Federal Government.

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instrument: Request for Payment of Monetary Allowance for Outer Burial Receptacles, VA Form 40-10232 (Part A, Allowance for Privately Purchased Outer Burial Receptacles)
 - a. Number of Total Annual Responses: 100
 - b. Processing Time per Response: 0.25 hours
 - c. Hourly Wage of Worker(s) Processing Responses: \$64.06
 - d. Cost to Process Each Response: \$16.02
 - e. Total Cost to Process Responses: \$1,602.00

VA estimates that submissions by individuals for Part A will be processed by a GS-13 Step 5 Accountant working in the Washington, DC metro area. The hourly wage in item 1.c. above is taken from the 2024 General Schedule (GS) Locality Pay Tables published by the U.S. Office of Personnel Management and can be found here:

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/pdf/DCB_h.pdf

- 2) Collection Instrument: Request for Payment of Monetary Allowance for Outer Burial Receptacles, VA Form 40-10232 (Part B, Allowance for Outer Burial Receptacles Placed at Time of Interment)
 - a. Number of Total Annual Responses: 40
 - b. Processing Time per Response: 0.25 hours

- c. Hourly Wage of Worker(s) Processing Responses: \$89.04
- d. Cost to Process Each Response: \$22.26
- e. Total Cost to Process Responses: \$890.40

VA estimates that submissions by States or Tribal Organizations for Part B will be processed by a GS-15 Step 5 Director working in the Washington, DC metro area. The hourly wage in item 2.c. above is taken from the 2024 General Schedule (GS) Locality Pay Tables published by the U.S. Office of Personnel Management and can be found here: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/pdf/DCB_h.pdf

- 3) Overall Labor Burden to the Federal Government
 - a. Total Number of Total Annual Responses: 140
 - b. Total Labor Burden: \$2,492.40

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$2,492.40
- 2) Total Operational and Maintenance Costs: \$0.00
- 3) Total Cost to the Federal Government: \$2,492.40

15. Reason for Change in Burden.

This is a new collection with a new associated burden.

16. Publication of Results.

The results of the 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 Act Submissions."

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