

SUPPORTING STATEMENT – PART A
DESIGNATION OF BENEFICIARY – GOVERNMENT LIFE INSURANCE AND
SUPPLEMENTAL DESIGNATION OF BENEFICIARY– GOVERNMENT LIFE INSURANCE
(VA Forms 29-336 and 29-336a)
2900-0020

Summary of Changes:

- This ICR is being submitted as an “Revision” but there are no changes to the burden or the information collection instruments.
- There are non-substantial revisions required for the VA Form 29-336 and 29-336a, however, those revisions do not affect the burden for this collection.
- Title: Designation of Beneficiary - Government Life Insurance and Supplemental Designation of Beneficiary (VA Forms 29-336 and 29-336a)
- The VA Form 29-336 is being updated to provide more defined instructions and examples on how to properly designate various beneficiaries. The changes provide clear information on who is paid in what order, including order of precedence on their beneficiary designations. This helps the insured understand the program requirements and puts them on notice of our procedures. This will enable the insured Veteran to better understand how to designate correctly and allow the VA to properly follow the insured Veterans beneficiary designation without ambiguities. This will improve processing efficiency which is required in the new law.
- VA Insurance also added a trust designation section to help insured Veterans better designate trusts that they have set up as the beneficiary.
- These modifications will not change any previous calculations. Therefore, this is a non-substantial change.
- No comments were received during the 60-Day comment period
- Two comments were received during the 30-Day comment period

1. Need for the Information Collection

These forms are used by the insured to designate beneficiaries and select an optional settlement to be used when the insurance matures by death. The information is required to determine the claimant’s eligibility to receive the proceeds. The information on the form is required by law, 38 USC Sections 1917, 1949 and 1952.

2. Use of the Information

The data collected on the form is used by the personnel in the Insurance Division to determine who is eligible to receive the proceeds of the insurance.

3. Use of the Information Technology

VA Form 29-336 and VA Form 29-336a 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 forms. 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 forms to be incorporated with an existing centralized legacy database.

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 designate his/her beneficiary and select a settlement option to be used when the insurance matures by death. If the information is not collected, or is collected less frequently, the VA Insurance Center will not have up to date information in order to pay the proceeds of the insurance policies according to the Veteran's last wishes.

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 Thursday, October 24, 2024. The 60-Day FRN citation is 89 FRN 85009. No comments were received during the 60-Day comment period.

A 30-Day Federal Register Notice for the collection published on Monday, December 30, 2024. The 30-Day FRN citation is 89 FRN 106765. Two comments were received during the 30-Day comment period.

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 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: 83,500 (VA Form 29-336) and (VA Form 29-336a to be included with VA Form 29-336 as additional pages if needed to list additional beneficiaries or to list beneficiaries for additional policies)
- b. Frequency of Response: On occasion
- c. Annual Burden Hours: 13,917 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 weekly 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 **\$438,107** (13,917 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	0.17	\$26.24	\$4.46	83,500	\$372,410.00
Overhead at 100% Salary							\$372,410.00
5	3	2	0.03	\$17.31	\$0.52	83,500	\$43,420.00
Overhead at 100% Salary							\$43,420.00
4	3	2	0.03	\$15.48	\$0.46	83,500	\$38,410.00
Overhead at 100% Salary							\$38,410.00
Processing / Analyzing Costs							\$908,480.00
Printing and Production Cost							\$54.00
Total Cost to Government							\$908,534.00

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 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.