

SUPPORTING STATEMENT A
Committal Services, Memorial Services, and Funeral Honors
(Certification Requirements for Funeral Honors Providers)
OMB Control Number: 2900-0865

Summary of Changes from Previously Approved Collection

- Title of the collection: Certification Requirements for Funeral Honors Providers
- VA is making a small revision to the form to explicitly acknowledge 38 CFR 38.619.
- Changes in burden: The burden has decreased since the previous approval due to a decrease in the number of respondents and responses. The cost to the Federal Government decreased due to the annual responses and printing cost declining since the previous approval.
- NCA received one comment from the public.

1. Need for the Information Collection

The Department of Veterans Affairs (VA) requires this information to ensure that military funeral honors (“funeral honors”) activities performed on VA property maintain the honor and dignity of the national cemetery and do not negatively impact the safety of cemetery visitors. This collection is authorized by 38 U.S.C. 2402, 38 U.S.C. 2404, and 38 CFR 38.619. The regulatory requirement to complete the certification form applies to all funeral honors providers, including DoD-authorized details.

2. Use of the Information

VA is responsible for the safety of cemetery visitors and maintaining the honor and dignity of VA national cemeteries. Consequently, VA proposes certain requirements regarding conduct in the national cemeteries with which all funeral honors providers will certify their compliance. Funeral honors providers would be required to designate and provide contact information for a representative of their organization accountable for funeral honors activities. The designation of a funeral honors provider’s single point of contact would facilitate VA’s resource planning and cemetery administration and ensure that cemetery staff can quickly communicate information to, or obtain information from, an accountable representative from the organization.

All funeral honors providers be required to certify compliance with VA security, safety, and law enforcement regulations, published at 38 CFR 1.218, that protect cemetery visitors and employees. This certification raises awareness of VA standards and increases the accountability of these organizations performing activities on VA property. VA requires certification that equipment used by all funeral honors providers during a committal or memorial service be maintained and operated in a safe manner consistent with relevant VA policies and regulations, and if applicable, Department of Defense (DoD) policy.

In addition, all funeral honors providers would be required to certify that they will not solicit or accept donations on VA property, except as authorized under 38 CFR 1.218(a)

(8). Funeral honors providers, like all members of the public, are prohibited from soliciting contributions, commercial solicitation, vending of all kinds, displaying, or distributing commercial advertising, or collecting private debts in or on VA property. Restricting solicitation helps maintain the dignity and solemnity of the national cemeteries and protects families from disturbances.

In addition to the requirements above, VA would require non-DoD funeral honors providers certify that they are conducting activities on federal property as an independent entity, not as an agent or employee of VA, unless they are registered as a VA volunteer. This certification is to ensure that non-DoD funeral honors providers understand that they may be liable for any injuries or damages that could occur while providing funeral honors on VA-property. Similarly, non-DoD funeral honors providers are required to certify that its members have completed training on assigned funeral honors tasks and the safe use of equipment. Funeral honors providers' equipment and activities can cause harm to the user as well as the public, so it is necessary to require the training and safe use certification for anyone who uses such equipment or performs such tasks.

VA requires that non-DoD funeral honors providers certify that they will provide funeral honors services in accordance with the agreement between the provider and the personal representative. This certification is to ensure deference to the wishes of the personal representative in planning the content of a committal or memorial service.

NCA does not anticipate any psychological costs associated with this information collection outside of what may be expected and normal during routine form filling and document signing.

3. Use of Information Technology

The certification from funeral honors providers will consist of a fillable form, that is available for download. The form can be electronically completed and printed but requires a written signature. The form cannot be submitted electronically. The further use of information technology would not the reduce burden.

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

The collection of information does not involve small businesses or entities.

6. Less Frequent Collection

VA would be unable to ensure the safe conduct of funeral honors activities in a national cemetery without this collection of information. The information is collected as needed and cannot be collected less frequently.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that would cause this information collection to be conducted more often than quarterly.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, April 9, 2025. The 60-Day FRN citation is 90 FRN 15298.

One comment was received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, June 13, 2025. The 30-Day FRN citation is 90 FRN 25119.

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 to respondents will be made under this collection of information.

10. Confidentiality

All respondents will be informed that if the submitted material and information falls within the purview of the Privacy Act of 1974, it will be safeguarded in accordance with the applicable authorities.

11. Sensitive Questions

There are no questions of a sensitive nature.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument:

Funeral Honors providers Certification Form, VA Form 40-10190

- a. Number of Respondents: 303 Respondents
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 303 responses
- d. Response Time: 5 minutes¹
- e. Respondent Burden Hours: $((303 \times 5 \text{ minutes}) \div 60 \text{ minutes}) = 25 \text{ hours}$

2) Total Submission Burden

- a. Total Number of Respondents: 303 respondents
- b. Total Number of Annual Responses: 303 responses
- c. Total Respondent Burden Hours: 25 hours

¹ 0.083333 hours = 5 minutes ÷ 60 minutes.

The number of responses is 303 responses.

The total respondent time burden (hours) is 25 hours.

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument

Funeral Honors Providers Certification Form, VA Form 40-10190

- a) Number of Total Annual Responses: 303 responses
- b) Response Time: 5 minutes
- c) Respondent Mean Hourly Wage: \$31.48
- d) Labor Burden per Response: 5 minutes (0.083) \times \$31.48 hourly wage = \$2.623
- e) Total Labor Burden: 303 \times 5 minutes (0.083) \times \$31.48 = \$794.87

2) Overall Labor Burden

- a) Total Number of Annual Responses: = 303 annual responses
- b) Total Labor Burden: \$791.69 total labor burden

The Respondent hourly wage was determined by using the Bureau of Labor Statistics website.

Source: May 2023 Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, Code 00-0000, All Occupations:
https://www.bls.gov/oes/2023/may/oes_nat.htm#00-0000

13. Respondent Costs Other Than Burden Hour Costs

The respondent bears no costs, and this submission does not involve any recordkeeping costs.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT:

1) Collection Instrument

Funeral Honors Providers Certification Form, VA Form 40-10190

- a) Number of Total Annual Responses: 303 responses
- b) Processing Time per Response: 0.017 hours
- c) Hourly Wage² of Worker(s) Processing Responses: \$20.45
- d) Cost to Process Each Response 0.017 hours \times \$20.45 wage = \$0.34 cost to process
- e) Total Cost to Process Responses 303 responses \times \$0.34 cost = \$103.27

VA estimates that submissions will be processed by a GS 7 Step 1. The hourly wage in item 1.c. above is taken from the 2025 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/25Tables/html/GS_h.aspx

2) Overall Labor Burden to the Federal Government

² Grade 7 Step 1 hourly wage = \$20.45. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/GS_h.aspx.

- a) Total Number of Annual Responses: 303 annual responses
- b) Total Labor Burden: \$103.27 total labor burden

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$15.15
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$0 Equipment Cost + $(\$0.05 \times 303)$ \$15.15 Printing Cost + \$0 Postage + \$0 Software Purchases + \$0 licensing costs + \$0 Other = \$15.15 total maintenance cost

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$103.27 total labor cost
- 2) Total Operational and Maintenance Costs: \$15.15

Total Cost to the Federal Government: $\$103.27 + \$15.15 = \$118$

15. Reasons for Change in Burden

NCA adjusted the burden estimates (such as the number of responses, mean hourly wage, total cost to respondents, hourly wage for cemetery administrative staff, and total cost to the Federal government) since the previously submitted information collection. For example, NCA adjusted the average hourly pay for 1 cemetery administrative staff GS-7 federal employee to reflect current general schedule pay rates set by the Office of Personnel Management (OPM).

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 Act Submissions

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

