

SUPPORTING STATEMENT - PART A

Request for Commemorative Plaque or Urn – OMB Control Number: 2900-0937

- *Title: Claim for Commemorative Urn and Plaque for Veterans' Remains Not Interred*
- *Revisions to instruments including adding new ICs: 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.*

A. JUSTIFICATION:

1. Need for the Information Collection.

The VA Form 40-1330UP is used by the public to apply for a Government-provided commemorative plaque or urn to memorialize eligible Veterans in accordance with 38 U.S.C. § 2306. It is the source of information used to evaluate the applicant's claim for the benefit. The information is requested under 38 CFR § 38.634 and represents the minimum requirements by VA to properly determine the Veteran's eligibility for, and entitlement to, this benefit.

2. Use of the Information.

Currently, information on the forms is transcribed by a case manager to an ADP database and processed through a specially designed Automated Monument Application System by our case managers. The application is evaluated for accuracy and validity, and a case master record is established. The application will result in the provision of a plaque or urn or denial based on the Veteran's eligibility.

3. Use of Information Technology.

The forms will be available via the VA website. Applicants can submit the claim by mail or through VA's secured electronic submission system, QuickSubmit. VA use QuickSubmit to receive forms and documents from claimants.

4. Non-duplication.

No duplication is involved. The information is not available from an alternate source.

5. Burden on Small Businesses.

This information collection does not involve small businesses or entities.

6. Less Frequent Collection.

Since this information is on a “one time” basis it is not possible to reduce the frequency of this request.

7. Paperwork Reduction Act Guidelines.

NCA has one collection of information (OMB Control Number: 2900-0937), which supports one claim form (VA Form 40-1330UP). This information collection is part of a final rulemaking. Also, this collection supporting the 1330UP form has been subject to NCA modernization efforts of our information technology systems that are programming bots to automate claims processing and adjudication, like VBA’s bot-automated claims processes. At this stage, NCA cannot reprogram the bots to implement OMB’s new race/ethnicity demographic markers on this information collection without incurring significant costs and project delays. We plan to update OMB Control Number: 2900-0937 to implement the March 2024 guidance *in the next renewal cycle* to avoid increased costs and resource utilization that will adversely impact NCA’s development of modernized, automated systems. We believe this approach is consistent with OMB’s SPD-15 guidance that allows options for implementation as soon as possible, or at the time they are submitted for extension or revision to OIRA, but not later than March 28, 2029.

8. Consultation and Public Comments.

Part A: PUBLIC NOTICE

A proposed rule including the new collection of information was published on Monday, November 20, 2023; Page: 80649-80653. The proposed rule citation is 88 FR 80649. Nine comments were received during the comment period, none of which pertained to the information collection. 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 May 10, 2024 (Volume 89, Number 92, Pages 40386-40391).

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment.

There are no payments made or gifts given to respondents.

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 48VA40B, Veterans (Deceased) Headstone or Marker Records – VA, as published on August 26, 1975, as Federal Register citation 40FR38095.

11. Sensitive Questions.

The personal information asked on these forms is necessary for statistical data gathering, targeted outreach and utilization trend analysis and to better serve Veterans and for the effective delivery of memorial benefits. The form collects the applicant's race, ethnicity, date of birth and death, and gender identity information to assist with obtaining demographics information in order to better serve Veterans who may not be aware of our benefits and services. The applicant is informed that the information will be used for statistical purposes only.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

This is a new application for a new benefit. NCA estimates approximately 1,684 claims per year. NCA estimates a routine request for a plaque or urn will average 10 minutes unless there are complications. Therefore, NCA estimates an annual burden of 280.6667 hours.

Part B: LABOR COST OF RESPONDENT BURDEN

VA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, NCA 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 May 2023 BLS National Occupational Employment and Wage Estimates, the mean hourly wage is \$31.48 based on the BLS wage code – "00-0000 All Occupations."

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. NCA estimates the total cost to all respondents to be \$8,835.39 (280.6667 burden hours × \$31.48 mean hourly wage = \$8,835.39).

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.

This submission does not involve any recordkeeping costs. There are no capital or start-up costs. There are no operational or maintenance costs and no cost associated with the purchase of service or equipment.

14. Cost to the Federal Government.

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

The processing of applications will be handled within the existing processes for applications for headstones, markers, and medallions. NCA estimates the annual burden to the Government for review of reimbursement forms as follows:

- 1) Collection Instrument: Claim for Commemorative Urn or Plaque For Veterans, VA Form 40-1330UP
 - a. Number of Total Annual Responses: 1,684
 - b. Processing Time per Response: 0.05 hours
 - c. Hourly Wage of Worker(s) Processing Responses: \$25.92
 - d. Cost to Process Each Response: \$1.296
 - e. Total Cost to Process Responses: \$2,182.47

NCA estimates applications will be reviewed by a GS-7 Step 5 NCSO employee¹ working in the St. Louis area to be (1,684 applications × 3 minutes per case = 5,052 minutes. NCA divides 5,052 minutes by 60 minutes to get the total burden hours for application review (84.2 hours). Then, NCA multiplies 84.2 hours by the hourly rate for a GS-7/5 (\$25.92) to reach the total review cost of \$2,182.47).

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: \$2,182.47
- 2) Total Operational and Maintenance Costs: \$0.00
- 3) Total Cost to the Federal Government: \$2,182.47

15. Reasons for Change in Burden.

This is a new collection.

16. Publication of Results.

¹ Source (2024 General Schedule): St. Louis Area (NCSO employees) GS-7/5 https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/SL_h.pdf

The information collection is not for publication or tabulation use. The results of the information collection are not for publication or used as a statistical report.

17. Non-Display of OMB Expiration Date.

We are not seeking approval to omit the expiration date for OMB approval.

18. Exceptions to “Certification for Paperwork Reduction Submissions”.

We are not requesting any exemptions to the provisions stated in the certification statement.