

SUPPORTING STATEMENT - PART A

Presidential Memorial Certificate (PMC) – OMB Control Number 2900-0567

Summary of Changes from Previously Approved Collection

- Presidential Memorial Certificate (PMC) – There is no change in the title.
- Revisions to the instrument, VA Form 40-0247: 1) changing block 2 to block 2a Veteran SSN (*Required*) and 2b Service Number or VA File Number.
- Changes: There is an increase in cost since the previous approval due to an increase in respondent and Federal Government employee wage rates.
- NCA received two comments from the public on the 60-day FRN.

1. Need for the Information Collection

The Presidential Memorial Certificate (PMC) is an engraved paper certificate, signed by a current U.S. President, to honor the memory of deceased Veterans who are eligible for burial in a national cemetery. Information collection under OMB No. 2900-0567 and VA Form 40-0247, Presidential Memorial Certificate Request Form, is required to properly inscribe and address for delivery of the PMC. Supporting military or discharge documents are also needed to verify that the veteran's character of service and duty status meet program eligibility and legal requirements in accordance with U.S.C. Title 38 § 112: Presidential memorial certificate program and § 2411: Prohibition against interment or memorialization in the National Cemetery Administration (NCA) or Arlington National Cemetery of persons committing Federal or State capital crimes.

VA is renewing information collection 2900-0567, VA Form 40-0247, Presidential Memorial Certificate Request Form. The form is used by members of the public to request a Presidential Memorial Certificate. The information will be used to confirm that the recipient's eligibility meets the criteria for requesting presidential memorial certificates.

2. Use of the Information

Supporting military documents and VA Form 40-0247 are received by VA NCA, Memorial Products Service, Presidential Memorial Certificates Unit via three primary delivery sources. Those are via United States Postal Service (USPS) mailed directly to the PMC Unit, sent via a toll free 800-line fax service, or sent via access.va.gov. Information collected is used to establish eligibility to receive the certificate and to provide delivery information.

3. Use of Information Technology

The public may access VA Form 40-0247, Presidential Memorial Certificate Request Form, online and submit completed forms along with supporting military documentation through USPS, fax, or submit electronically via access.va.gov.

Once received, mailed forms are scanned creating a graphic file which is moved into an accessible electronic data base. Each image is date and time stamped to ensure that the oldest requests are processed first. PMC personnel process each request by reviewing the documents and the information on the forms is transposed manually into the PMC order processing file. Documents submitted via the toll free 800 fax service automatically create an image file which is also put into an electronic bin for review and processing. NCA is developing an electronic submission method in addition to the current ways to submit the form. As such, NCA is revising the form to account for electronic submissions. The respondents' burden to complete the form both online and manually are identical and should not exceed 3 minutes.

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

NCA collects data for the PMC program as it is crucial to VA's success in carrying out the request of the President to honor the memory of deceased Veterans. Without the form and ability to collect information reflected on the form, VA will not be able to offer a PMC to the individual family members and loved ones who only request a PMC and no other burial benefit. Not having the form will also prohibit the VA's ability to carry out the assigned task of providing a PMC to all the families and loved ones of a qualified person acknowledging that a grateful nation appreciated the Veterans military service. Requests are processed as submitted so there is no additional burden expected for respondents. There are no known technical or legal obstacles associated with reducing the burden on families at their time of need by collecting information from a requestor who voluntarily completes the form to obtain a PMC.

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 (FRN) for the collection published on Thursday, April 2, 2026. The 60-Day FRN citation is 91 FRN 16812.

Two comments were received during the 60-Day Comment Period. They are included below in the order they were received, as well as our Agency's response to the comment.

Public comment:

Dear National Cemetery Administration, Department of Veterans Affairs:

As a DAV member and constituent of Maryland, I am offering my public comment in support/ opposition of this regulation because of its impact on Disabled American Veterans by . . ."

Response to the comment: Dear Commenter,

The Department of Veterans Affairs (VA) National Cemetery Administration appreciates your comments submitted in response to the renewal notice for the 2900-0567 information collection.

You submitted two substantially similar comments on the VA renewal notice for the 2900-0567 information collection, which stated:

- "... As a DAV member and constituent of Maryland, I am offering my public comment in support/ opposition of this regulation because of its impact on Disabled American Veterans by . . ."

To clarify, the Notice is not a regulation; and, the purpose of the Notice is to renew the Office of Management and Budget's approval of the form to request a Presidential Memorial Certificate. You can access the form here: [VA Form 40-0247, Presidential Memorial Certificate Request Form](#). Additionally, your comments did not clearly convey a position on the renewal notice, which you are welcome to resubmit for VA's review and response.

Again, we thank you for the comments on this collection of information and support of our Nation's Veterans.

A 30-Day Federal Register Notice for the collection published on Tuesday, June 30, 2026. The 30-Day FRN citation is 91 FRN 39723.

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

An individual's personal information will be kept confidential and in strict accordance with VA privacy policies and applicable legal authorities. Social Security numbers and military service numbers are requested solely to ensure accurate identification of records for the purpose of determining veteran status and eligibility for the named service member. All respondents will be informed that all submitted material and information falls within the purview of the Privacy Act of 1974 and will be safeguarded in accordance with the applicable System of Records Notice (SORN). The VA SORN would be "Veterans and Dependents National Cemetery Interment Records" (SORN #42VA41A).

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(s)
[Presidential Memorial Certificate (PMC)]
 - a) Number of Respondents: 125,000
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 125,000
 - d) Response Time: 3 minutes
 - e) Respondent Burden Hours: 6,250 hours
- 2) Total Submission Burden (Summation or average based on collection)
 - a) Total Number of Respondents: 125,000
 - b) Total Number of Annual Responses: 125,000
 - c) Total Respondent Burden Hours: 6,250 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[Presidential Memorial Certificate (PMC)]
 - a) Number of Total Annual Responses: 125,000
 - b) Response Time: 3 minutes
 - c) Respondent Hourly Wage: \$32.66
 - d) Labor Burden per Response: \$1.63
 - e) Total Labor Burden: \$204,125
- 2) Overall Labor Burden

- a) Total Number of Annual Responses: 125,000
- b) Total Labor Burden: \$204,125

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, 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 latest available BLS data, the mean hourly wage is \$32.66 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: <https://data.bls.gov/oes/#/industry/000000>.

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. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[Presidential Memorial Certificate (PMC)]

- a) Number of Total Annual Responses: 125,000
- b) Processing Time per Response: 0.5 hours
- c) Hourly Wage of GS-7/1 Worker(s) Processing Responses: \$23.94
- d) Cost to Process Each Response: \$11.97
- e) Total Cost to Process Responses: \$124,687.50

2) Collection Instrument(s)

[Presidential Memorial Certificate (PMC)]

- f) Number of Total Annual Responses: 125,000
- g) Processing Time per Response: 0.25 hours
- h) Hourly Wage of GS-4/1 Worker(s) Processing Responses: \$17.27
- i) Cost to Process Each Response: \$4.32
- j) Total Cost to Process Responses: \$8,994.79

3) Collection Instrument(s)

[Presidential Memorial Certificate (PMC)]

- k) Number of Total Annual Responses: 125,000
- l) Processing Time per Response: 0.25 hours
- m) Hourly Wage of GS-9/1 Worker(s) Processing Responses: \$29.28
- n) Cost to Process Each Response: \$7.32
- o) Total Cost to Process Responses: \$15,250.00

- 4) Collection Instrument(s)
[Presidential Memorial Certificate (PMC)]
 - p) Number of Total Annual Responses: 125,000
 - q) Processing Time per Response: 0.25 hours
 - r) Hourly Wage of GS-12/1 Supervisor(s) Processing Responses: \$48.59
 - s) Cost to Process Each Response: \$12.15
 - t) Total Cost to Process Responses: \$25,307.29
- 5) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 125,000
 - b) Total Labor Burden: \$174,240

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: \$174,240
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$174,240

15. Reasons for Change in Burden

The burden has increased since the previous approval due to an increase in respondent and Federal Government employee wage rates. The respondent labor burden increased from \$186,000 to \$204,125 due to the mean hourly wage for All Occupations increasing from \$29.76 to \$32.66 since the information collection was renewed three years ago.

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.