

**SUPPORTING STATEMENT FOR
International Terrorism Victim Expense Reimbursement Program Application**

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The International Terrorism Victim Expense Reimbursement Program Application will be used to apply for monetary reimbursement by U.S. nationals and U.S. government employees (including contractors of the U.S. Government) who become victims of acts of international terrorism that occur outside the United States. The application will be used to collect necessary information on expenses incurred by the victim/claimant, as associated with his or her victimization, as well as other pertinent information, and will be used by OVC to make a reimbursement determination. Such reimbursement is authorized by the Victims of Crime Act of 1984 (VOCA) (42 U.S.C. '10603c).

Over the years, hundreds of nationals of the United States, and officers and employees of the U.S. government, have been killed or injured in heinous acts of international terrorism occurring outside the United States. Victims of acts of international terrorism occurring outside the United States face unique obstacles in securing the assistance, reimbursement, and support more readily available to victims of violent crime and domestic or international terrorism occurring within U.S. borders. Victims and family members often face immediate needs, such as the need to cover medical expenses, funeral and burial expenses, short-term lodging, and emergency transportation. Language and cultural barriers can impair victims' abilities to secure appropriate support. Moreover, resources for victim assistance vary widely from one country to the next. Many of the countries that have established victim compensation programs reimburse only their own citizens. Thus, American citizens and employees of the U.S. government are not eligible for reimbursement under some of these programs.

Although OVC provides funding to states to administer victim compensation programs, the programs administered by each state vary considerably; survivors of the same act of international terrorism occurring abroad may be residents of many different states and thus receive different levels of reimbursement for similar injuries. Partially in recognition of this disparity of treatment, VOCA was amended so that states shall no longer be required to reimburse victims of international terrorism occurring outside the United States, and the federal government shall oversee a reimbursement program for these victims. Additionally, by providing coverage for employees of the U.S. government abroad, this Statute authorizes payment for foreign nationals working for the U.S. government who may be killed or injured in an international terrorist attack.

After several years in use, OVC received several suggestions for improving the current application materials and making the application less cumbersome for victims. In response to requests for updating the application, the revisions to the application were included in the August

2013 version of the application. The revisions are non-substantive, provide clarification, and help the applicant understand what information is being requested. For example, one change is making the text of the application larger and easier to read, the use of plain language, providing simplified instructions for completing the application on the face of the document rather than having a separate instruction document to review. Other changes include additional spacing to separate the sections and minor editing changes. Similar updates have been incorporated into the proposed 2014 application.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

OVC has been mandated by law (under an amendment to the Victim of Crime Act of 1984 (Public Law 98-473 [42 U.S.C. §10603c]) to make victim reimbursement funds available to those victims described above in point (1). The application is necessary for the victims/claimants to request reimbursement funds for their out-of-pocket expenses and is further necessary to assist OVC staff to objectively, fairly, and equitably determine distribution of the reimbursement funds, as well as to appropriately account for the allocation of public funds.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The application will be available both in hard copy and electronic format via the Internet for the claimants to print and complete. The application and supporting documentation (i.e., original receipts or other documentation) may be submitted via hand delivery or the postal system.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

Because the law reaches back to acts of international terrorism occurring on or after October 23, 1983, a data tracking system listing all victims of these acts is used. To further identify such victims for the purpose of providing reimbursement of expenses to the victims as associated with their victimization, the collection of information, via the application, will be necessary. Duplication will not be an issue since no form/application to collect this information existed or was available to OVC prior to the ITVERP application

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The collection of information does not have a significant impact on businesses or other small entities.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information from the victims is not collected, the government would run the risk of distributing funds without any standards, which may be viewed by the victims themselves, or the public at large, as unfair or inequitable. Further, without a standardized collection of information (i.e., application), the program could be subject to both internal and external fraud.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances identified at this time.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in

response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-Day Notice was published in the Federal Register on November 30, 2025 (90 FR 53389). The comment period ended on December 30, 2025. No comments were received. The 30-Day Notice was published in the Federal Register on June 17, 2026 (91 FR 36620). The comment period ends on July 17, 2026.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

No gifts or remunerations are provided to claimants/victims other than the funds being authorized under the intended purpose of the International Terrorism Victim Expense Reimbursement Program.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

OVC has established a Privacy Act system of records entitled International Terrorism Victim Expense Reimbursement Program which was published in the Federal Register. Application materials and other supporting documents received from claimants will be maintained in accordance with the U.S. Department of Justice's System of Records. See Federal Register, September 4, 2002 (Volume 67, Number 171) and August 7, 2006 (Volume 71, Number 151). In addition, records will be maintained in accordance with the Privacy Act of 1974 (5 U.S.C. ' 552a).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are questions on the application that could be considered by the applicant to be of a sensitive nature, specifically, information regarding victims' medical costs or the provision of

mental health services as well as social security or other tax identification numbers. If in the course of the voluntary submission of the application, the claimant desires reimbursement for expenses associated with his or her medical or mental health costs, such information and documentation will be necessary. The collected information will be used only to determine eligibility of reimbursement for the requested medical or mental health costs, and, in accordance with Justification Ten (10) listed directly above, no identifiable information will be released. The applicant will be provided an opportunity to read, review, and sign the Authorization, Consents and Certifications section of the voluntary victim reimbursement application.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Estimated burden hours: After the initial backlog of applications, the number of applications submitted to the program has decreased to an estimated 100 claims annually. The number of applications received is determinant upon acts of international terrorism. The applicant will submit an application to request victim reimbursement. The average time to complete the application is projected to be 45 minutes per application, excluding time required to gather supporting documentation (e.g., death certification, proof of guardianship, copies of receipts for expenses). Therefore, the total estimated burden hour is 75. The calculation is: 100 applications X 45 (or .75) minutes per app. = 75 total estimated burden hours.

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Name of collection instrument ex: Survey (Individuals)	100	45 mins	100		75 hours		
Worksheet (Private Sector)							
Unduplicated Totals							

Hourly rate source citation or you may enter a footnote:

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3)**

for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The anticipated one-time annual cost to the claimant is minimal; the cost of postage to mail the original application and original receipts to OVC. As previously noted, 100 applicants per year are anticipated. In recent years, mail in paper applications has dropped to an average of 5 per year. Domestic ground postage for mailing the complete application package is estimated at \$7.90, the anticipated one-time annual cost is calculated as follows: (5 domestic applicants X \$7.90 for postage) = \$39.50. On rare occasions, a victim may elect to express mail information to OVC to expedite the processing of a claim. OVC is unable to estimate costs associated with express mail as this is not mandatory, but an elective alternative for submitting information.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

Estimates of annualized costs to the Federal government are based on two broad items: 1) expense reimbursements to victims of acts of international terrorism; and 2) contractor costs. The first category of costs is difficult to estimate, given that it is dependent upon circumstances and events taking place in the world. Nevertheless, \$50,000,000 has been earmarked for reimbursement costs. The second category for contractor costs of \$398,214.63 includes such items as personnel and labor costs and other direct costs. These cost figures do not include future incidents of international terrorism. By statute, the total estimated costs to the Federal Government may not exceed \$50 million in any given fiscal year.

15. Explain the reasons for any program changes or adjustments.

This ICR has program adjustments due to recent changes in paper applications received and admin costs are only for contractor support.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Specific information related to claimants will not be published. Only the aggregate program numbers will be totaled and reported to Congress in a legislatively mandated Annual Report to Congress. A descriptive analysis of the victims assisted under the program will include: 1) the number of applications for reimbursement submitted; 2) the number of applications approved and the amount of each reimbursement; 3) the number of applications denied and the reasons for the denial; 4) the average length of time to process an application for reimbursement; and, 5) the number of applications for reimbursement pending and the estimated future liability of the program.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.
OVC will display the OMB Control Number and expiration date on the application form.

18. Explain each exception to the certification statement.

None. There are no exceptions identified in Item 19, Certification for Paperwork Reduction Act Submissions, of OMB Form 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This item does not employ statistical methods.