

SUPPORTING STATEMENT A

Application for Standard Government Headstone or Marker for Installation in Private or State Veterans Cemetery - OMB Control Number: 2900-0222

Summary of Changes from Previously Approved Collection

- Title of the collection: Application for Standard Government Headstone or Marker for Installation in Private or State Veterans Cemetery
- VA is making an administrative correction to the General Information Sheet (page 1) for each form under the paragraph “WHO IS ELIGIBLE” to correct an administrative oversight. VA inserted the words: “for enlisted personnel and October 16, 1981 for officer personnel” in the second sentence so it now reads: “Service after September 7, 1980 for enlisted personnel and October 16, 1981 for officer personnel, must be a minimum of 24 months continuous active duty or completed under special circumstances (e.g., death on active duty).” VA inadvertently left this information out in the previous submission.
- VA is deleting the fax coversheet from the VA Form 40-1330 and VA Form 40-1330M.
- VA is making a small revision to the Illustrations of Standard Government Headstones language (page 2) for the VA Form 40-1330, so it now reads: “The concrete base or slab is not furnished by the Government, and some cemeteries may require a base or slab as part of the installation. VA will not pay for or reimburse for this cost.”
- Changes in burden: The burden has increased since the previous approval due to an increase in the number of respondents and responses. The cost to the Federal Government increased due to the wage increasing since the previous approval.
- VA received no comments on the 60-day FRN.

1. Need for the Information Collection

VA Form 40-1330 is used by the public to apply for Government-provided headstones or markers for the unmarked graves of eligible veterans in accordance with 38 U.S.C. § 2306 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. It is the source of information used to evaluate the applicant’s claim for the benefit. The information is requested under 38 CFR §§ 38.630, 38.631, and 38.632 and represents the minimum requirement by VA to properly determine the veteran’s eligibility for, and entitlement to, this benefit.

VA Form 40-1330M is used by the public to apply for Government-provided medallions to be affixed to privately purchased headstones or markers for deceased individuals who served in the armed Forces on or after April 6, 1917, are interred in private cemeteries, and who are eligible for a headstone or marker under 38 U.S.C. § 2306(a)(2) or (5) 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. It is the source of information used to evaluate the applicant’s claim for the benefit. The requested information represents the minimum requirement by VA to properly determine the Veteran’s eligibility for, and entitlement to, this benefit.

2. Use of the Information

The respondents may be family members, or other personal representatives assisting families at time of need for burial arrangements. Respondents will use the forms and provide information to apply for Government-provided headstones or markers in accordance with 38 U.S.C. § 2306. It is the source of information used to evaluate the applicant's claim for the benefit. Each form provides information and instruction to the respondent. The information requested includes data about the decedent, military service, or other data to determine eligibility. The form is electronic, may be filled out and submitted electronically or downloaded, printed, and mailed in. 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 Caseworkers. The application is evaluated for accuracy and validity, and a case master record is established. The application will result in the provision of a headstone or marker or medallion or be cancelled.

3. Use of Information Technology

The forms will be available via the VA website. It is feasible to submit them electronically at this time by using Quick Submit. For both forms, approximately 80 percent of responses are submitted electronically.

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

This collection has a frequency of only one time per individual associated with the death of such individual.

7. Paperwork Reduction Act Guidelines

NCA has one collection of information (OMB Control Number: 2900-0222), which supports two claim forms (VA Form 40-1330 headstone/marker; and VA Form 40-1330M, medallion). This information collection is up for renewal. Also, this collection supporting the 1330 and 1330M forms 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: 2900-0222 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 60-Day Federal Register Notice (FRN) for the collection published on Thursday, May 23, 2024. The 60-Day FRN citation is 89 FRN 45748.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Thursday, July 26, 2024. The 30-Day FRN citation is 89 FRN 60689.

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

11. Sensitive Questions

These forms request the decedent's race, ethnicity, date of birth and death, and gender identity. It also asks the applicant to indicate, if any, the desired emblem of belief, which may indicate religious beliefs. The emblem of belief is a common element for headstones or memorial markers. The other types of sensitive information assist with obtaining demographics information to better serve Veterans and other eligible persons who may not be aware of benefits and services they may be entitled to. 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

1) Collection Instruments:

Claim for Standard Government **Headstone or Marker**, VA Form 40-1330

- a. Number of Respondents: 167,269 Respondents
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 167,269 responses
- d. Response Time: 15 minutes
- e. Respondent Burden Hours: $((167,269 \times 15 \text{ minutes}) \div 60 \text{ minutes}) = 41,817.25 \text{ hours}$

Claim for Government **Medallion** for Placement in a Private Cemetery, VA Form 40-1330M

- a. Number of Respondents: 15,766 Respondents
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 15,766 responses
- d. Response Time: 15 minutes
- e. Respondent Burden Hours: $((15,766 \times 15 \text{ minutes}) \div 60 \text{ minutes}) = 3,941.50 \text{ hours}$

2) Total Submission Burden

- a. Total Number of Respondents: $167,269 + 15,766 = 183,035 \text{ respondents}$
- b. Total Number of Annual Responses: $167,269 + 15,766 = 183,035 \text{ responses}$
- c. Total Respondent Burden Hours: $41,817.25 \text{ hours} + 3,941.50 \text{ hours} = 45,759 \text{ hours}$

The number of responses is 183,035 responses.

The total respondent time burden (hours) is 45,759 hours.

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

Claim for Standard Government Headstone or Marker, VA Form 40-1330

- a) Number of Total Annual Responses: 167,269 responses
- b) Response Time: 15 minutes
- c) Respondent Mean Hourly Wage: \$31.48
- d) Labor Burden per Response: $15 \text{ minutes} \times \$31.48 \text{ hourly wage} = \7.87
- e) Total Labor Burden: $167,269 \times 15 \text{ minutes} \times \$31.48 = \$1,316,407.03$

Claim for Government Medallion for Placement in a Private Cemetery, VA Form 40-1330M

- a) Number of Total Annual Responses: 15,766 responses
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$31.48
- d) Labor Burden per Response: $15 \text{ minutes} \times \$31.48 \text{ hourly wage} = \7.87
- e) Total Labor Burden $15,766 \times 15 \text{ minutes} \times \$31.48 \text{ hourly wage} = \$124,078.42$

2) Overall Labor Burden

- a) Total Number of Annual Responses: $167,269 + 15,766 = 183,035 \text{ annual responses}$
- b) Total Labor Burden: $\$1,316,407.03 + \$124,078.42 = \$1,440,485.45 \text{ total labor burden}$

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/2022/may/oes_nat.htm#00-0000

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)

Claim for Standard Government Headstone or Marker, VA Form 40-1330

- a) Number of Total Annual Responses: 167,269 responses
- b) Processing Time per Response: 0.25 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$34.96
- d) Cost to Process Each Response $0.25 \text{ hours} \times \$34.96 \text{ wage} = \$8.74 \text{ cost to process}$
- e) Total Cost to Process Responses $167,269 \text{ responses} \times \$8.74 \text{ cost} = \$1,461,931.06$

Claim for Government Medallion for Placement in a Private Cemetery, VA Form 40-1330M

- a) Number of Total Annual Responses: 15,766 responses
- b) Processing Time per Response: 0.25 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$34.96
- d) Cost to Process Each Response: $0.25 \text{ hours} \times \$34.96 \text{ wage} = \$8.74 \text{ cost to process}$
- e) Total Cost to Process Responses: $15,766 \text{ responses} \times \$8.74 \text{ cost} = \$137,794.84 \text{ cost}$

VA estimates that submissions will be processed by a GS 9 Step 3 Case Manager working in the St. Louis, MO metro area. The hourly wage in item 1.c. above is taken from the 2024 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/24Tables/pdf/DCB_h.pdf

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: $167,269 + 15,766 = 183,035 \text{ annual responses}$
- b) Total Labor Burden: $\$1,461,931.06 + \$137,794.84 = \$1,599,726 \text{ total labor burden}$

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: $\$0 \text{ Equipment Cost} + \$0 \text{ Printing Cost} + \$0 \text{ Postage} + \$0 \text{ Software Purchases} + \$0 \text{ licensing costs} + \$0 \text{ Other} = \$0 \text{ total maintenance cost}$

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$1,599,726 total labor cost
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: $\$1,599,726 + \$0 = \$1,599,726$

15. Reasons for Change in Burden

The burden has increased since the previous approval due to an increase in the number of responses.

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 instruments.

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

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