

COLLECTIONS OF INFORMATION

1. REASON FOR ISSUE. This directive updates policy for the National Cemetery Administration (NCA) for collections of information that must meet requirements under the Paperwork Reduction Act (PRA) of 1995, codified in 44 U.S.C. Chapter 35. Revision is needed to update the policy and provide additional information to meet PRA requirements.

2. SUMMARY OF CONTENTS/MAJOR CHANGES. This directive:

a. Sets forth and implements VA policy and responsibilities for NCA Collections of Information Program; and

b. Provides guidance to NCA offices and facilities that utilize collections of information that are subject to PRA compliance requirements, which require information to meet burden calculation analysis in Appendix A, justification template in Appendix B, white paper change template in Appendix C, 60-day notice template in Appendix D, and 30-day notice template in Appendix E.

3. RESPONSIBLE OFFICE. National Cemetery Administration, Legislative and Regulatory Service (42E), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the material contained in this directive. Questions may be referred to the Director, Legislative and Regulatory Service, or NCA42EAction@va.gov.

4. RELATED PUBLICATIONS. VA Directive 6309, Collections of Information (January 12, 2010).

5. RESCISSION. None.

6. RECERTIFICATION. This directive is scheduled for recertification the last day of December 2027.

/s/

Matthew T. Quinn
Under Secretary for Memorial Affairs

Distribution: Electronic Only

COLLECTIONS OF INFORMATION

1. PURPOSE/SCOPE:

a. Policy for information collection is provided in VA Directive and Handbook 6309, Collections of Information and Collections of Information Procedures. The purpose of the National Cemetery Administration (NCA) Directive 6309 is to establish policy for clearance of all collections of information through the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA).

b. The directive includes guidance on reporting requirements for the previous fiscal year's summary of information collection activity (to include PRA violations, burden reduction efforts, etc.) and a forecast for the coming fiscal year. NCA's report will be included in the annual Information Collection Budget (ICB) Report to Congress.

c. This directive provides information to NCA program offices on the risks of non-compliance with PRA requirements.

2. POLICY:

a. NCA will establish and maintain a Collections of Information Program as required by the PRA of 1995.

b. NCA will only collect information essential to the implementation, conduct or management of NCA programs.

c. Forms and information collections must have OMB approval, display a respondent burden statement, and be compliant with applicable Federal laws and guidance issued by OMB, VA, and NCA.

d. A collection of information will not become effective until OMB has assigned a control number. A valid OMB control number will be displayed on the information collection instrument unless OMB determines it to be inappropriate.

e. Standards, processes, policies, procedures, and definitions for the creation, renewal, modification, discontinuation, or cancellation of Collections of Information within NCA Program Offices processes will be in accordance with OMB protocols and requirements.

f. Forms used in the collection of information must be electronically designed, whenever possible, for ease of interpretation, completion, transmittal, processing, and retrieval by persons with disabilities.

g. NCA will utilize electronic transmission of data, automated systems, and electronic forms and form letters, when appropriate, to reduce and control the paperwork burden.

h. NCA must submit all electronic forms to the VA Forms Manager, Publications Service, for review of adherence to current laws and Department forms standards before being placed on the Internet, Local Area Network (LAN), or any other electronic medium capable of dissemination to one or more people for data collection purposes.

i. NCA will utilize data that is currently available in electronic files or other format to the extent practicable and not impose additional reporting burdens on the public. NCA will not require an additional report to verify the accuracy of collected data.

j. NCA will support its collections of information with approved justification statements and white papers that include OMB-required burden calculations and other analysis.

k. NCA will publish in the *Federal Register* the 60-day notice that provides information about the affected public, the estimated annual burden in hours, the estimated average burden per respondent in minutes, the frequency of response, and the estimated number of respondents for OMB-approved collections of information. The public may provide comments for VA review and consideration, which NCA can address in its publication of the 30-day notice.

3. BACKGROUND:

a. **Information Collection Budget Report:** In accordance with procedures prescribed by OMB, an annual, comprehensive Information Collection Budget (ICB) for all NCA collections of information activities will be submitted. NCA program offices must evaluate their information collection activities on an ongoing basis. These evaluations should determine where respondent burden can be decreased (e.g., collecting the information less frequently, consolidating report instruments, applying cost savings measures to the benefit of the federal government, or eliminating the collection in its entirety) See 5 CFR § 1320.17. Information collection violations and reinstatements from NCA and other VA offices is reported to the VA Chief Data Officer (CDO) and included in OMB's ICB Report to Congress.

b. **Non-Compliance with PRA Requirements.** When OMB becomes aware of a PRA violation, the VA Chief Data Office must resolve them in a timely manner, or VA risks official Departmental reprimand that may have budget implications. Using an unapproved or expired collection is a PRA violation that may result in such a reprimand.

4. RESPONSIBILITIES:

a. **Principal Deputy Under Secretary for Memorial Affairs (PDUSMA)** is responsible for approving new or substantive changes to NCA existing collections of information (i.e., associated with a NCA rulemaking, implements OMB or other guidance) that have been approved by NCA Senior Executive Service-level leadership.

b. **Deputy Under Secretary for Finance and Planning (DUSF&P)** is responsible for:

(1) Approving NCA input for the VA Information Collection Budget (ICB) for OMB's report to Congress.

(2) Approving policy for NCA collections of information as contained in this directive.

c. NCA Deputy Under Secretaries and NCA Central Office Executive Directors are responsible for:

(1) Oversight of their subordinate program offices' timely completion of information collections for their programs and subordinate facilities; and,

(2) Approving supporting documentation for information collections referenced in Appendices A, B, C, D, and E for approval by the VA Clearance Office and OMB.

d. NCA District Executive Directors are responsible for:

(1) Oversight of their subordinate facilities' timely completion of information collections for their operational and administrative activities;

(2) Clearing supporting documentation for information collections referenced in Appendices A, B, C, D, and E for approval by the VA Clearance Office and OMB; and

(3) Executing the responsibilities assigned in paragraph 4.f.

e. NCA Service Directors and their Equivalentents are responsible for:

(1) Assigning staff to coordinate with the NCA PRA Liaison on requests for updated information to renew existing collections of information or to develop new collections, as needed.

(2) Approving collections of information within their respective organizations to ensure they display the OMB approval number, respondent burden information, Privacy Act statements for collections that request Social Security numbers, and other related activities specified in this directive.

(3) Coordinating with the NCA PRA Liaison and Director, Legislative and Regulatory service to complete tasks relating to clearance of collections of information and preparation of data for the annual ICB.

(4) Notifying the NCA PRA Liaison of a need to develop a new information collection or revise an existing one that meets the formatting requirements provided in Appendices B, C, D, and E of this directive.

(5) For qualitative or quantitative customer satisfaction surveys, coordinate with the NCA PRA Liaison to determine customer needs and levels of satisfaction with existing services in accordance with Executive Order 12862, Setting Customer Service Standards.

f. NCA District Executive Directors, Cemetery Directors, Program Office Staff Members, and District Office Staff Members are responsible for:

(1) Maintaining awareness of and adhering to NCA Collection of Information Program policy, processes, and requirements for developing a new, or revising an existing, information collection;

(2) Identifying requirements for a new or revised collection of information and notifying leadership within their chain of command of it for evaluation and further action; and

(3) Providing support, as assigned, for the development of information collections under NCA's Collection of Information Program.

g. Director, Legislative and Regulatory Service is responsible for:

(1) Managing the NCA Collections of Information Program to ensure NCA-wide implementation of the Collection of Information Program and compliance with the PRA of 1995.

(2) Designating staff to serve as the 42E NCA PRA Liaison and the PRA alternate.

h. NCA PRA Liaison is responsible for:

(1) Monitoring OMB 3-year clearance requirements for collections of information to plan activities nine months prior to ICR expiration date, and to initiate processes to renew, discontinue, or reinstate an ICR.

(2) Monitoring the Regulatory Information Service Center (RISC) and Office of Information and Regulatory Affairs (OIRA) Combined Information System (ROCIS) for status of all clearance requirements.

(3) Consulting and providing guidance to NCA leadership and assigned staff referenced in paragraphs 4.d, 4.e., and 4.f. on the following issues:

(A) Conducting final reviews of ICR packages and providing NCA Program Offices with copies of final documents submitted in the Regulatory Information Service Center (RISC) and Office of Information and Regulatory Affairs (OIRA) Combined Information System (ROCIS).

(B) Obtaining timely input or action from NCA leadership and assigned staff referenced in paragraphs 4.d, 4.e., and 4.f. on their collection requests (ICRs).

(C) Assisting with drafting and publication of 30- or 60-day *Federal Register* Notices, announcing NCA's intent to collect information and seeking public comments. Please see Appendix D for the 60-day Notice template.

(D) Notifying NCA leadership and assigned staff referenced in paragraphs 4.d, 4.e., and 4.f. of OMB actions, including public comments received in response to *Federal Register* Notices, final OMB Notice of Action (NOA).

(E) Assisting NCA leadership referenced in paragraph 4.e. with drafting input for the VA ICB for OMB's report to Congress.

(4) Reviewing input from NCA leadership and assigned staff referenced in paragraphs 4.d, 4.e., and 4.f. on the following:

(A) Supporting white paper/change documents with rationale for non-substantive text changes to approved information collections;

(B) Justification Statements that include burden calculations for 30-day or 60-day *Federal Register* Notices for substantive changes to approved or new collections of information.

(5) Providing advice and assistance on NCA Collections of Information Program to VA and OMB officials, principal investigators, as well as NCA leadership and assigned staff referenced in paragraphs 4.d, 4.e., and 4.f.

(6) Requesting assistance from the VA Publications Forms Manager to assign required form numbers to NCA ICR forms and applications and to develop new or update existing NCA forms.

(7) Coordinating with the VA Clearance Officer to obtain OMB approval for all NCA collections of information and reporting or recordkeeping requirements.

(8) Deferring to the VA Clearance Officer on the following issues:

(A) Communications with the OMB Desk Officer on NCA Collections of Information inquiries.

(B) Submission and publication of all NCA PRA-related *Federal Register* Notices (FRN) and white paper/change documents.

(C) Coordination of NCA responses to OMB or public comments received in the *Federal Register* to NCA PRA-related Notices.

(D) Assessment of deficiencies noted in NCA ICRs in reported in ROCIS.

(9) Reporting and updating names, mail routing symbols, and telephone numbers of the designated coordinators to the Director, VA Enterprise Records Service.

(10) Providing PRA training to NCA staff.

(11) Serving as the NCA representative in VA community of interest activities, such as collaborative PRA forums.

5. REFERENCES:

The relevant authorities and requirements governing collections of information are:

- (1) E-Government Act 2002;
- (2) Executive Order 12291, Federal Regulation;
- (3) Executive Order 12862, Setting Customer Service Standards;
- (4) Executive Order 13011, Information Technology Management Reform Act of 1996;
- (5) OMB Circular A-129, Managing Federal Credit Programs;
- (6) Paperwork Reduction Act (PRA) of 1995, as amended (44 U.S.C. Chapter 35);
- (7) Public Law 103-283, Section 207a, Legislative Appropriations Act;
- (8) Public Law 104-106, Division E, Information Technology Management Reform;
- (9) Public Law 100-527, Section 4(d), Department of Veterans Affairs Act;
- (10) Public Law 111-5, Section 1512, American Recovery and Reinvestment Act of 2009, (Grant, Cooperative Agreements and Loans);
- (11) Rehabilitation Act of 1973, Section 508 of the Workforce Investment Act of 1998;
- (12) Title 5, CFR, Part 1320, Controlling Paperwork Burdens on the Public;
- (13) Title 5, U.S.C. Section 552, Freedom of Information Act;
- (14) Title 5, U.S.C. Section 552a, Privacy Act of 1974, as amended; and
- (15) Title 38 U.S.C. Sections 310, 5701, 5705, and 7332, Veterans Benefits.
- (16) VA Directive 6309, Collections of Information (January 12, 2010).
- (17) VA Handbook 6309, Collections of Information Procedures (January 12, 2010).

6. DEFINITIONS:

a. Burden. The total time, effort, or financial resources expended to generate, maintain, retain, or disclose or provide information to or for a Federal agency (5 CFR § 1320.3(b)). See Appendix A for Burden Calculation instructions.

b. Burden calculations. There are two types of burden calculations. Agencies must provide the respondent burden that informs the public of the time needed and cost associated with a member of the public's provision of the requested information on an approved Government information collection. Also, agencies must provide Government's burden represented as a monetary cost for an employee to review the information provided in response to an approved information collection. Burden calculations must be fully explained and supported in the Justification statement also called Supporting Statement A.

c. Collection of Information. Includes the act of collecting information as well as different types of collected information, as described below.

(1) Obtaining, causing to be obtained, soliciting, or requiring the disclosure to an agency, third parties or the public of information by or for an agency by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on 10 or more members of the public or "persons" (individuals, partnerships, associations, corporations, business trusts, legal representatives, organized groups of individuals, and states, U.S. territories, and local governments or their components), whether such collection of information is mandatory, voluntary, or required to obtain a benefit (see 5 CFR § 1320.3(c));

(2) Information collected may be in any form or format, including the use of report forms; application forms; schedules; questionnaires; surveys; reporting or recordkeeping requirements; contracts; agreements; policy statements; plans; rules or regulations; planning requirements; circulars; directives; instructions; bulletins; requests for proposal or other procurement requirements; interview guides; oral communications; posting, notification, labeling, or similar disclosure requirements; telegraphic or telephonic requests; automated, electronic, mechanical, or other technological collection techniques; standard questionnaires used to monitor compliance with agency requirements; or any other techniques or technological methods used to monitor compliance with agency requirements.

(3) Consent forms that are completed by and signed by individuals must be cleared through OMB. If the consent form is prepopulated with the required information and the individual is only required to sign and date the form, OMB clearance is not required.

(4) Ten or more persons does not include employees of the respondent acting within the scope of their employment, contractors engaged by a respondent for the purpose of complying with the collection of information, or current employees of the Federal Government (including military reservists and members of the National Guard while on active duty) when acting within the scope of their employment, but it does include retired and other former Federal employees. However, if the collection of information includes questions posed to agencies, instrumentalities, or employees of the United States, if the results are to be used for general statistical purposes, that is, if the results are to be used for statistical compilations of general public interest, including compilations showing the status or implementation of Federal activities and programs;

d. Freedom of Information Act (FOIA). A law that gives you the right to access information from the federal government. It is often described as the law that keeps citizens in the know about their government.

e. Information. Any statement of fact or opinion, regardless of the form or format, whether in numerical, graphic, or narrative form, and whether oral or maintained on paper, electronic or other media (see 5 CFR § 1320.3(h)).

f. Interagency Report. Interagency reports that require collection of information from the public, or State or local governments will require OMB clearance.

g. Justification Statement. A document that contains agency-specific responses to questions for OMB review and approval. VA must provide programmatic support for its request for OMB approval of a collection of information that includes information, data, and analysis of applicable statutes and regulations, costs, and methodologies. This document must be reviewed and approved by NCA leadership for approval by the VA Clearance Office and OMB. See Appendix B for a template of the Justification Statement.

h. Recordkeeping Requirement. A requirement imposed by or for an agency on persons to maintain specified records, including a requirement to:

- (1) Retain such records;
- (2) Notify third parties, the Federal Government, or the public of the existence of such records;
- (3) Disclose such records to third parties, the Federal Government, or the public; and,
- (4) Report to third parties, the Federal Government, or the public regarding such records (see 5 CFR § 1320.3(m)).

i. White paper/change document. A document that describes proposed non-substantive text changes with rationale to approved collections of information. This document must be reviewed and approved by NCA leadership for approval by the VA Clearance Office and OMB.

APPENDIX A: BURDEN CALCULATION GUIDANCE

1. General Information: NCA must provide information about burdens associated with a collection of information. As defined in 5 CFR 1320.3(b), NCA must estimate the time for the public to answer the request for information, as well as the time and cost for government employees to review the public's responses. OMB will review an agency's burden calculations in responses to questions 12 through 14 in the Justification Statement (see Appendix B).

2. Guidance for Burden Calculations: Listed below is useful resources and guidelines for NCA leadership and assigned staff referenced in paragraphs 4.d, 4.e., and 4.f. to consider when developing new, renewing, or changing NCA collections of information.

a. Respondent Burden: To calculate the respondent cost burden in response to Question 12 of the Justification Statement, NCA uses Occupational Employment and Wage Statistics hourly wage earnings from the Bureau of Labor Statistics (BLS). NCA needs to know the occupations of the respondents such as whether they are funeral directors. Below is an example:

The May 2021 Bureau of Labor Statistics gathers information on full-time wage and salary workers. Accordingly, the mean hourly wage earnings of full-time and salary workers is \$28.01.

Source: The general wage code of "00-0000 All Occupations" can be found by clicking this link: https://www.bls.gov/oes/2021/may/oes_nat.htm#00-0000.

(i) This BLS hyperlink changes every year, so rather than using the word "current", NCA should update the hyperlink to the current year/may/oes_nat.htm#00-0000.

b. Government Burden: To calculate the government cost burden in response to Question 14 of the Justification Statement, NCA uses Office of Personnel Management (OPM) data. NCA needs to know the General Schedule (GS) level(s) of the employee(s) and the amount of time (minutes or hours) that there will be a government burden for this collection of information. Below is an example:

Example of Management and Administrative Costs

A GS 12 employee will take 10 minutes to review and implement a decision. $\$37.67$ GS 12 hourly wage \times 0.1667 hours = \$6.28. Next, NCA multiplies the 0.1667 hours by the 1,777 respondents to calculate 296.2259 burden hours. Then, NCA multiplies the \$6.28 by the 1,777 respondents to calculate the \$11,158.83 management and administrative cost.

(i) The OPM hyperlinks change every year, so NCA should update the hyperlink to the current year/SL_h.pdf.

(ii) If there is more than one government cost (ex. Clerical and Management costs), NCA will need to combine all government costs to provide the total cost to the Government.

(iii) If a collection of information is associated with a rulemaking, NCA must also include in the Regulatory Impact Analysis projected costs over a five-year period.

APPENDIX B: JUSTIFICATION TEMPLATE

INSTRUCTIONS: *In a new .docx file, copy and paste the template and insert information contained in brackets and indicated by “x” marks that is tailored to the collection of information.*

**Title: [Title of the collection, form or instrument]
[OMB 2900-XXXX]
VA Form [40-XXXX], if applicable**

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.

[Explain why this information collection is necessary, identify any statutory (United States Code) or regulatory (Code of Federal Regulations) references associated with this collection, or other requirement (Executive Order). If applicable, provide the VA form number associated with this collection.]

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.

[Explain the purpose of the information collection. If applicable, provide the VA form number and OMB approval number for the collection.]

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.

[If applicable, describe the nature of the electronic or automated information collection, to include fillable forms or web resources. If electronic submissions are not feasible for an information collection, provide a negative response with rationale.]

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 2 above.

[Explain why this collection is unique.]

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

[Insert language regarding impact of small businesses or other small entities or provide a negative response with rationale.]

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.

[Describe risks, negative outcomes, or other issues affecting benefits administration or impacts on Veterans associated with not having the information collection approved.]

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 a 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 secrets, 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.

[Insert language. If none of the above circumstances apply, state "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. 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.

[If the response to this question is affirmative, provide the Federal Register citation for the Notice, including a summary of comments, if received, or a detailed description of the consultation with external parties on the collection of information.]

If this section does not apply, insert language such as “No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.” Or “No comments were received during the 60-Day Comment Period.”]

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

[Explain whether or not there are payments made or gifts given to respondents. If none, state “No payments or gifts are being offered to respondents as an incentive to participate in the collection.”]

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

[Describe whether the information collection conforms to Privacy Act requirements. For example, “A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.”]

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.

[Provide additional justification for any questions of a sensitive nature. If none, state “No questions considered sensitive are being asked in this collection.”]

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. Generally, estimates should not include burden hours for customary and usual business practices.

[Insert language with the number of annual respondents, frequency of response, and the number of annual burden hours. Also include the average respondent burden time in minutes to complete the VA form(s) associated with this collection.]

Estimate of Information Collection Burden.

- a. Number of Respondents: []
- b. Frequency of Response: [For example, "One time." Or "Voluntarily, as needed."]
- c. Annual Burden Hours: []
- d. Estimated Completion Time: []
- e. 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 13.

Source: https://www.bls.gov/oes/2021/may/oes_nat.htm#00-0000.

If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

[If this request covers one or more forms, insert the OMB approval number and provide burden estimates for each form. Also, provide an aggregate of the hour burdens on OMB Form 83-I.]

13. Provide an estimate for 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).

a. 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 services 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.

- [Describe annual cost burdens covered or provide a negative response with rationale.]

b. 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 collections 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.

- [Explain cost estimate variances with rationale. If none, provide a negative response with rationale.]

c. 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.

- [If applicable, provide rationale for purchased of equipment or services related to the collection of information. If none, provide a negative response with rationale.]

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

- [Insert language about annual costs and burdens and cost methodology.]

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/SL_h.pdf

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

[Insert rationale or explanations for NCA's adjusted burden estimates.]

16. For collections of information whose results will be published, outline plans for tabulation 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.

[If applicable, describe analytical techniques or other studies, including results that serve as the basis for changes to an existing or need for a new collection of information. If not applicable, provide a negative response, such as "Not applicable. No studies are associated with this collection of information."]

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.

[Insert rationale for excluding the expiration date or a negative reply. For example, "We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument."]

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

[insert explanation for exceptions to the certification statement or a negative reply. For example, "We are not requesting an exception for the certification."]

B. Collection of Information Employing Statistical Methods:

[If applicable, describe the statistical methods are used in the collection of information. If not applicable, provide a negative reply. For example, "No statistical methods were used in this collection of information."].

APPENDIX C: WHITE PAPER CHANGE EXAMPLE

INSTRUCTIONS: *In a new .docx file, copy and paste the template and insert information contained in brackets and indicated by “x” marks that is tailored to the collection of information.*

[TITLE – includes ICR information (form number, survey, etc.) and high-level description]

SAMPLE WHITE PAPER CHANGE

Description of Changes to VA Form [40-XXXX, (Title of Form), OMB Control Number (2900-XXXX)]

The Department of Veterans Affairs (VA) National Cemetery Administration (NCA) is proposing changes to VA Form [XX-XXXX, (Title of Form)].

NCA is making the following non-substantive text edits to the form:

- **Block X:** change from [current content] to [revised or new content]
- **Block X:** change from [current content] to [revised or new content]

VA will update the [insert type of information collection] once OMB approval of the proposed changes is received.

APPENDIX D: FEDERAL REGISTER 60-DAY NOTICE TEMPLATE

INSTRUCTIONS: *In a new .docx file, copy and paste the template and insert information contained in brackets and indicated by “x” marks that is tailored to the collection of information.*

OMB Control No. 2900-XXXX

Agency Information Collection Activity: *[Insert in bold text the ICR Title]*

AGENCY: National Cemetery Administration, Department of Veterans Affairs.

ACTION: Notice.

SUMMARY: National Cemetery Administration, Department of Veterans Affairs (VA), is announcing an opportunity for public comment on the proposed collection of certain information by the agency. Under the Paperwork Reduction Act (PRA) of 1995, Federal agencies are required to publish notice in the Federal Register concerning each proposed collection of information, including each proposed extension of a currently approved collection, and allow 60 days for public comment in response to the notice.

DATES: Written comments and recommendations on the proposed collection of information should be received on or before [INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

ADDRESSES: Submit written comments on the collection of information through Federal Docket Management System (FDMS) at www.Regulations.gov or to *[insert PRA Liaison’s name,]* National Cemetery Administration (42E), Department of Veterans Affairs, 810 Vermont Avenue, NW, Washington, DC 20420 or e-mail to

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NCA42EACTION@va.gov. Please refer to “OMB Control No. [2900-XXXX]” in any correspondence. During the comment period, comments may be viewed online through FDMS.

FOR FURTHER INFORMATION CONTACT: Maribel Aponte, Office of Enterprise and Integration, Data Governance Analytics (008), 810 Vermont Ave. NW, Washington, DC 20006, (202) 266-4688 or email maribel.aponte@va.gov. Please refer to “OMB Control No. [2900–XXXX]” in any correspondence.

SUPPLEMENTARY INFORMATION: Under the PRA of 1995, Federal agencies must obtain approval from the Office of Management and Budget (OMB) for each collection of information they conduct or sponsor. This request for comment is being made pursuant to Section 3506(c)(2)(A) of the PRA. With respect to the following collection of information, NCA invites comments on: (1) whether the proposed collection of information is necessary for the proper performance of NCA’s functions, including whether the information will have practical utility; (2) the accuracy of NCA’s estimate of the burden of the proposed collection of information; (3) ways to enhance the quality, utility, and clarity of the information to be collected; and (4) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or the use of other forms of information technology.

Authority: *[example: Public Law XXX-XX; XX U.S.C. XXXX –XXXX.]*

Title: *[Insert Title and Form numbers if applicable or add form numbers in abstract.]*

[OMB Control Number: 2900-XXXX.]

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Type of Review: [*example*: Extension of a currently approved collection.]

Abstract: The major use of the form is to [...]

Affected Public: [*example*: Individuals and households.]

Estimated Annual Burden: [XXX,XXX hours.]

Estimated Average Burden per Respondent: [XX minutes.]

Frequency of Response: *example*: [One time.]

Estimated Number of Respondents: [XXX,XXX.]

By direction of the Secretary:

Maribel Aponte,

VA PRA Clearance Officer,

Office of Enterprise and Integration, Data Governance Analytics,

Department of Veterans Affairs.

BILLING CODE 8320-01-P

APPENDIX E: 30-DAY FEDERAL REGISTER NOTICE TEMPLATE

[OMB Control No. 2900-XXXX]

Agency Information Collection Activity under OMB Review: *[Insert in bold text the ICR Title]*

AGENCY: National Cemetery Administration, Department of Veterans Affairs.

ACTION: Notice.

SUMMARY: In compliance with the Paperwork Reduction Act (PRA) of 1995, this notice announces that the National Cemetery Administration, Department of Veterans Affairs, will submit the collection of information abstracted below to the Office of Management and Budget (OMB) for review and comment. The PRA submission describes the nature of the information collection and its expected cost and burden and it includes the actual data collection instrument.

DATES: Written comments and recommendations for the proposed information collection should be sent within 30 days of publication of this notice to www.reginfo.gov/public/do/PRAMain. Find this particular information collection by selecting "Currently under 30-day Review - Open for Public Comments" or by using the search function. Refer to [OMB Control No. 2900-XXXX].

FOR FURTHER INFORMATION CONTACT: Maribel Aponte, Office of Enterprise and Integration, Data Governance Analytics (008), 810 Vermont Ave. NW, Washington, DC 20006, (202) 266-4688 or email maribel.aponte@va.gov. Please refer to [OMB Control No. 2900-XXXX] in any correspondence.

SUPPLEMENTARY INFORMATION:

Authority: [Public Law XXX-XX; XX U.S.C. XXXX –XXXX.]

Title: [Insert Title and Form numbers if applicable, or include form numbers.]

OMB Control Number: [2900-XXXX.]

Type of Review: [example: Extension of a currently approved collection.]

Abstract: The major use of the form is to [...]

An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The *Federal Register* Notice with a 60-day comment period soliciting comments on this collection of information was published at [insert citation date: example: 81 FR 241 on December 15, 2016, pages 90922 and 90923.]

Affected Public: []

Estimated Annual Burden: [XX,XXX hours].

Estimated Average Burden Per Respondent: [XX minutes.]

Frequency of Response: [example: “One time.” Or, “Voluntarily, as needed.”]

Estimated Number of Respondents: [XX,XXX.]

By direction of the Secretary:

Maribel Aponte,

VA PRA Clearance Officer,

Office of Enterprise and Integration, Data Governance Analytics,

Department of Veterans Affairs.

BILLING CODE 8320-01-P