

Supporting Statement for VA Form 40-0241 (State Cemetery Data)

A. Justification

1. The State Cemetery Data form, VA Form 40-0241, is required to provide data regarding the number of interments conducted at State veterans cemeteries each year. This data is necessary for budget and oversight purposes. In addition, the Department of Veterans Affairs (VA's) State Cemetery Grants Service needs this data to answer questions which arise during the course of the year to respond to Congressional correspondence and to project and predict the need for burial space and the demand for state grants. Burial data tells us usage rates and helps in the prediction of when a cemetery needs to develop additional acreage (request a grant to expand) or a cemetery is going to close. The amount of acreage used helps the State Cemetery Grants Service and National Cemetery Administration (NCA) anticipate closing and the requirement for additional cemeteries (either State or national). Lower burial rates may indicate problems such as ineffective outreach or poor maintenance that should be investigated. The data is used in conjunction with the data gained from the national cemeteries to consider where to place national or state cemeteries. 38 CFR, part 39.3 states that "the Secretary and any authorized representative (in this case the State Cemetery Grants Service) will have access to and the right to examine all records, books, papers or documents related to the grant." Part 39.5 discusses follow-up procedures once a cemetery is established and states the need for audits, etc. See 38 CFR Extracts.

2. The data gathered annually is used by the State Cemetery Grants Service to conduct studies. For example, the Service uses this data to demonstrate to the States (especially those without State veterans cemeteries) not only the viability of the program, but to demonstrate that they have a need. The State Cemetery Grants Service data shows that in 1999, for example, State veterans cemeteries provided for burial of 13,392 veterans and eligible family members, nearly 16 percent of the total number of burials provided by VA national cemeteries. The Service can demonstrate that State veterans cemeteries are needed and a demand exists for the services provided. The State Grants Service is a user of this data as is the Office of the Deputy Under Secretary for Operations and the Budget and Planning Service in the Office of the Deputy Under Secretary for Management in NCA. States use this data as well as congressional offices, veteran's organization and interested citizens.

3. The agency is considering electronic collection of most of the data requested on the form. New State veteran's cemeteries, for example, are being connected to the National Cemetery Administration's Burial Operations Support System (BOSS), an automated management information system. Existing cemeteries are being connected as feasible, but the connection requires new software, training, and in some cases, hardware and data transmission infrastructure. The form, with an explanation to fill it out, is relatively simple. It is designed to be simple for a person to fill-out and the user

(State Cemetery Grants Service) to extract data (see attached form). The form is available on the One VA website.

4. There is no duplication. This is the only report required from the State veterans cemeteries.

5. The form does not impact small businesses.

6. If this data were not collected, the State Cemetery Grants Service would be hampered in its ability to convince States to apply for grants and to accept the burden of operating and maintaining these cemeteries in perpetuity. It is in the interest of the federal government to encourage states to share the burden of developing, operating and maintaining these cemeteries. Without the form, the Service could not answer various congressional or State correspondence or internal inquiries within VA. The budget process would be hampered by our inability to provide objective data required of us to justify and explain the program. We could not compare the state grants program to other similar programs, which data is periodically asked for. Without the data, we could not anticipate the need for additional burial space.

7. We know of no special circumstances that make the collection of information inconsistent with 5 CFR 1320.6, or that would cause this information collection to be conducted in a manner that would be inconsistent with the restrictions listed in the 10/95 instructions for completing Paperwork Act Submissions.

8. The State Cemetery Grants Service officials regularly visit the State veterans cemeteries, at least every three years. Service personnel are in more frequent contact by phone, usually as often as once a quarter or more. This data collection effort is discussed and there has never been a problem as a result of asking for such data. In promoting a grant or the idea of a need to build a State veterans cemetery with grant money, the data from the states is a key part of the effort. It demonstrates a requirement. It helps the Service and the States determine when to begin development of additional acreage for burial space and, in so doing, to anticipate when to provide money to expand or improve these cemeteries. State veterans cemeteries relieve the Federal Government of the need to build and maintain additional new national cemeteries. It is in the interest of the Federal Government to effectively promote the State Cemetery Grants Program.

The Department notice was published in the Federal Register on June 20, 2007, pages 34071-34072 (Volume 72, Number 118). No comments were received during the 60-day Federal Register Notice.

9. There is no payment or gift to respondents for completing the form.

10. There are no assurances of confidentiality in connection with this form. The result of studies gained from the data is passed back to the States in a generic form. We do not produce a "ranking" of the most active State veterans cemeteries, or a ratio expressing

the relationship between operating costs and numbers of burials. Too many variables, including climate and local expectations, would tend to make such comparisons invidious. Data is generally aggregated on a national or multi-state basis or the data is used to respond to a specific question that does not include such comparisons. Nonetheless, there is no assurance of confidentiality offered or implied.

11. The questionnaire contains no questions of a sensitive nature.

12. The estimated annual respondent burden for the collection of the information is 66 hours. This estimate is determined as follows:

- a. The number of respondents (66) is arrived at based on the number of applicants from the State veterans cemeteries completing the form.
- b. Each respondent completes one application each year.
- c. Each application requires approximately 60 minutes to complete.
- d. The number of respondents (66) multiplied by the number of annual responses (1) multiplied by the time required per response (60 minutes) yields the annual burden of 66 hours.
- e. The annual cost to the respondent is \$990 based on 66 responses annually. This amount is based on 60 minutes completion time, for each form, at a cost of \$15 per hour for each respondent.

13. No record keeping is required on the part of respondents. At the State Grant Service level, it takes two or three hours to file this data. This is a once a year requirement. The costs are minimal to produce the form and to fill it out. Existing stocks can be expected to last for several years. It can also be economically photocopied since small numbers of forms are required.

14. The annual cost to the Federal Government for administering the form is estimated at \$2,795 based on 66 responses annually. This amount is based on a processing time of one (1) hour per response in the State Cemetery Grants Service, NCA, using a salary of a GS 13/5 (\$43 per hour). If this form were not used, Federal costs would be much higher because staff would have to spend many hours on an ad hoc basis interviewing state cemeteries and responding to questions as they arise rather than being able to review collected data to answer questions.

15. There are no program changes, there was an adjustment as Kentucky State Cemetery North in Williamstown, Kentucky opened June 11, 2007.

16. There are no plans to publish the results of this collection of information.

17. We are not seeking approval to display the expiration date.

18. There are no exceptions to the certification statement.

B. Collection of information Using Statistical Methods

No statistical methodology or estimation procedures are necessary to collect this information.