

SUPPORTING STATEMENT FOR PAY NOW ENTER INFO PAGE
OMB APPROVAL NUMBER 2900-0663

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

VA collects debts as authorized by 31 U.S.C. § 3711 (2006) and 38 U.S.C. §§501, 5314 (2006). Section 3711(d) of title 31 and sections 501(a) and 5314(d) of title 38 authorize the Secretary of Veterans Affairs (VA) to act under regulations he prescribes as well as the Federal Claims Collection Standards, 31 C.F.R., pts. 900 – 904. VA collection standards at 38 C.F.R. §§ 1.900 - 1.953 (2007), as revised at 69 Fed. Reg. 62188 – 62201 (October 25, 2004), were issued pursuant to the Federal Claims Collection Standards. Sections 1.904 and 1.910 of the VA standards call for collection in the form of money (with limited exception) and for aggressive collection action, respectively. This Web initiative was taken in the spirit of the President’s Management Agenda and the E-Government Act of 2002, Pub. L. no. 107-347 as codified at 44 U.S.C. Ch. 36. Debt Management Center (DMC) believes its Web-based payment system has proven to be a convenience for individuals owing debts to VA (see paragraphs 12 and 13).

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

Entry of the data on the Pay Now Enter Info Page (initiated at the VA portal, www.pay.va.gov) in combination with the respondent verifying the information by clicking “Next” redirects the respondent to a Department of the Treasury Web site (Pay.gov) where credit card payments or direct debits (Automated Clearing House – ACH) can be transacted. The information entered by the respondent on the VA Pay Now Enter Info Page is not, initially, sent to the Treasury Web site. Instead, the entries are stored on a VA Web server and an Agency I.D. and (anonymous) Tracking I.D. are transmitted to the Treasury server. When the Pay.gov site sends an electronic acknowledgment, the VA Web server sends 19 data elements to Pay.gov. One of the 19 is the respondent’s name entered on the Pay Now Info Page. The data elements returned to Pay.gov are generated to synchronize the further exchange of data and are not personal to the respondent, except his or her name. After completion of credit card or direct debit transaction, transaction data is returned to the VA Web server along with the Tracking I.D. The tracking I.D. is used to identify the data set created by the initial entries on the Pay Now Enter Info Page and, in turn, the VA account receivable record corresponding to the person who made a credit card or direct debit payment. At the end of the online payment process, a report of the transaction is generated with a combination of data elements from both the Pay Now Info Page and Treasury’s Pay.gov site (neither credit card nor financial institution account information is returned to VA from the Treasury site). Since the initial approval of the Pay Now Enter Info Page on July 15, 2005, programming was installed to automatically update individual accounts receivable records for credit card and direct debit (ACH) transactions initiated on the Pay Now Enter Info Page.

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.

This collection is conducted on the Internet. Respondents fill in data in their computer terminals and are automatically redirected to the Department of the Treasury’s Pay.gov Web site. At the conclusion of the transaction, the respondent receives a message confirming its success or failure. The estimated burden time for completing the VA Web form is 10 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the entries on the web form. The time would be considerably less should the respondent have a copy of a letter sent to him or her by DMC readily available.

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.

We know of no duplication on the Internet. The VA file number, the respondent's name, type of debt and, in some instances, telephone number are made part of the debtor's automated master record when a debt is established and serve to initiate collection action to which the debtor responds by accessing the subject Web page. The data used to populate the debtor's master record is transferred from the VA Benefit Delivery Network (BDN) or Veterans Service Network (VETSNET), which, in turn, populated the data elements with information provided by the debtor when he or she originally applied for benefits on forms approved by OMB. Without this data collection on the subject Web page, we would be unable to associate online credit card or direct debit payments with the corresponding account receivable.

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

The collection of this information does not involve small businesses or entities.

6. Describe the consequences 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.

DMC is participating in a program of online collections in cooperation with the Department of the Treasury's Pay.gov initiative and has demonstrated substantial amounts can be collected online based on experience since initial approval of the Web form. The convenience factor is significant for both the debtor and the Government. In the first full fiscal year the collection site was available to veterans and dependent beneficiaries, they used the site to pay more than \$7.4 million. In FY 2013, \$70.8 million was collected.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; 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 and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 C.F.R. §1320.6.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor'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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notice was published on January 31, 2014, page 5529, Volume 79, Number 21. No comments were received.

b. Describe efforts to consult with persons outside the agency to obtain their views on the

availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

Specific consultations outside the Department were not made since the parties involved are completing the form satisfactorily.

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

No payment or gift is provided to respondents.

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.

The data entered on the Pay Now Info Page is stored electronically on the VA Web server and is transferred to DMC by electronic media on a periodic basis for permanent storage. Confidentiality of the information entered on the form is governed by VA system of records 58VA21/22, Compensation, Pension, Education and Rehabilitation Records-VA, and 88VA244, Accounts Receivable Records-VA, both published in the Privacy Act Issuances, 2005 Compilation. The accounts receivable records system maintained and managed by DMC is subsidiary to the records system established and maintained for programs associated with delivery of veterans' benefits.

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; include 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 no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

DMC anticipates persons owing debts to VA will enter data on the Pay Now Enter Info Page 148,000 times each fiscal year. We further expect the average respondent will spend 10 minutes accessing the Web site and entering the eight data elements for a total annual hour burden of 24,667. If the respondent has a letter from DMC readily available or has high-speed Internet access, the burden could be less.

b. 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 83-I.

This request only covers one form.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information.

We estimate the annualized costs to respondents will be \$370,005 based upon an hourly standard respondent labor cost of \$15.00.

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

There are not costs in addition to the hour burden shown in item 12.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Maintenance of two Web pages is insignificant when no major revisions of function are contemplated. The Web pages perform two straight forward tasks - they present a gateway for the respondent to initiate bill payment which is performed at another Web site under the management and control of the Department of the Treasury; and, they establish a tracking number so that payments may be associated with individual accounts receivable. No additional equipment, overhead printing expenses or support staff will be necessary to maintain the function or appearance of the subject Web page.

15. Explain the reason for any program changes or adjustments in burden hours or respondent burden.

The change in burden hour is a result of the increase in number of respondents.

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.

There are no plans to publish the results of the information collected.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA is seeking an exemption to waive the displaying of the expiration date on the Pay Now Enter Info Page website.

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

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.