

Supporting Statement for VA Form 21-509
Statement of Dependency of Parent(s)
(2900-0089)

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. 38 U.S.C. 102 requires that income and dependency must be determined before benefits may be paid to or for a dependent parent. Regulatory authority is found in 38 CFR 3.4 and 38 C.F.R. 3.250. Information is requested by this form under the authority of 38 U.S.C. 501(a)(2).
2. VA Form 21-509 is used to gather income and dependency information from claimants who are seeking payment of benefits as or for a dependent parent. This information is necessary to determine dependency of the parent. The form is used by a veteran seeking to establish his/her parent(s) as dependents as well as by a surviving parent seeking death compensation.
3. VA Form 21-509 is available on the VBA website as a fillable form. Claimants may print and submit applications non-electronically.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department.
5. The collection of information does not involve small businesses or entities.
6. The VA compensation and pension programs require proof of age and/or relationship for payment of benefits. This form solicits information needed to determine eligibility to benefits for dependent parents. Without this information, it would not be possible for VA to authorize benefits to or for dependent parents.
7. There are no special circumstances requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on October 16, 2007, pages 58740-58741. No outside consultations were solicited as no major changes are being made to the form. Field stations have not reported any difficulty on the part of respondents in using the form. No comments were received.
9. No payments or gifts to respondents have been made under this collection of information.
10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22, "Compensation, Pension, Education and Rehabilitation Records

- VA" as set forth in Privacy Act Issuances, 1993 compilation found in 42 Fed. Reg. 49726 (9/27//1977).

11. There are no questions of a sensitive nature.
12. Estimate of Information Collection Burden.
 - a. Number of Respondents is estimated at 8,000 per year.
 - b. Frequency of Response is one time for most beneficiaries.
 - c. Annual burden is 4,000 hours.
 - d. The estimated completion time of 30 minutes is based on review by staff personnel and previous usage of this form.
 - e. The total estimated cost to respondents is \$60,000 (4,000 hours x \$15 per hour).
13. This submission does not involve any recordkeeping costs.
14. Estimated Costs to the Federal Government:
 - a. Processing/Analyzing costs \$167,520
 $(GS-9/5 @ \$25.00 \times 8,000 \times 45/60 \text{ minutes} = \$150,000)$
 $(GS-3/5 @ \$13.14 \times 8,000 \times 10/60 \text{ minutes} = \$ 17,520)$
 - b. Printing and production cost \$440
 - c. Total cost to government \$167,960
15. There is no change in burden.
16. The information collection is not for publication or tabulation use.
17. The collection instrument, VA Form 21-509, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this form. This form is submitted to OMB every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collecting, processing and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 21-509.
18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

1. The Veterans Benefits Administration does not collect information employing statistical methods.