

Supporting Statement for VA Form 21-527
Income–Net Worth and Employment Statement
(2900-0002)

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. VA Form 21-527 is used to help VA gather information to comply with 38 U.S.C. 1502 and 1503, which provide the statutory basis for the disability pension program. The regulatory basis for permanent and total ratings for pension is found at 38 CFR 3.340 and 3.342.
2. VA Form 21-527 is used by veterans who have previously filed a claim for compensation and/or pension and wish to file a new claim for disability pension or reopen a previously denied claim for disability pension. The information requested by VA Form 21-527 is necessary to determine eligibility to this benefit. It would be impossible to administer this program without the collection of this information.
3. VA Form 21-527 is available on the VBA website for downloading by claimants. 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. This form solicits employment, dependency, and family income and net worth information. Without this information, VA would be unable to authorize disability pension benefits.
7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on December 21, 2006, Volume 71, Number 245, page 76725. Field stations have not reported any difficulty on the part of respondents in using the VA Form 21-527. 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.

11. There are no questions of a sensitive nature.
12. Estimate of Information Collection Burden.
 - a. Number of Respondents is estimated at 104,440 per year.
 - b. Frequency of Response is one time for most beneficiaries.
 - c. Annual burden is 104,440 hours.
 - d. The estimated completion time of 60 minutes is based on review by staff personnel and previous usage of this form.
 - e. The total estimated cost to respondents is \$1,566,600 (104,440 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	\$4,220,769
(GS-9/5 @ \$21.75 x 104,440 x 70/60 minutes = \$2,650,165) (GS-5/5 @ \$14.35 x 104,440 x 35/60 minutes = \$ 874,250) (GS-3/5 @ \$11.43 x 104,440 x 35/60 minutes = \$ 696,354)	
b. Printing and production cost	\$5,222
c. Total cost to government	\$4,225,991
15. There is no change in the reporting burden.
16. The information collection is not for publication or tabulation use.
17. The collection instrument, VA Form 21-527, 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 21-527.
18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

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