

Supporting Statement for VA Forms 21-0781 and 21-0781a
Statement in Support of Claim for Service Connection for Post-Traumatic Stress Disorder
(PTSD)
Statement in Support of Claim for Service Connection for Post-Traumatic Stress Disorder
(PTSD) Secondary to Personal Assault
(2900-0659)

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. 5103A provides that VA has a duty to assist claimants in obtaining evidence that is necessary to substantiate their claims, including relevant records when claimants have given VA sufficient information to locate such records. 38 U.S.C. 5107(a) provides that claimants have a responsibility to support a claim for benefits. 38 CFR 3.304(f) provides that service connection for post-traumatic stress disorder (PTSD) requires a medical diagnosis; a link, established by medical evidence, between current symptoms and an in-service stressor; and credible supporting evidence that the claimed in-service stressor occurred. When a veteran who did not serve in combat or was not a prisoner of war claims PTSD due to in-service stressors, there must be credible supporting evidence that the claimed stressors occurred.
2. VA Forms 21-0781 and 21-0781a are used to gather specific information about in-service stressors, so VA can assist claimants in obtaining credible supporting evidence that the claimed stressors occurred. In-service stressors reported by veterans must be verifiable. VA cannot thoroughly research military records and other sources of information for credible supporting evidence unless the veteran provides VA with specific information about the in-service stressors. The forms request information that is necessary to conduct meaningful research of records.
3. VA Forms 21-0781 and 21-0781a are available on the One-VA web site in a fillable electronic format. VBA is currently hosting these forms on a secure server and does not currently have the technology in place to allow for the complete submission of the forms. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the forms to be incorporated with an existing centralized legacy database.
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 information that is necessary to verify that in-service stressors occurred. The form is used only when VA is unable to concede in-service stressors due to combat service or former prisoner-of-war status. Without this collection of information, VA would not fulfill its statutory duty to assist claimants and would be unable to properly authorize 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 October 11, 2007, Volume 72, Number 196, pages 57997-57998. VA Regional office staff members record complaints and data for an ongoing form improvement program. 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 15,240 per year: 14,400 for VA Form 21-0781 and 840 for VA Form 21-0781a.

b. Frequency of Response is one time for most beneficiaries.

c. Annual burden is 17,780 hours.

d. The estimated completion time of 70 minutes is based on review by staff personnel.

e. The total estimated cost to respondents is \$266,700 (17,780 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 \$419,989

(GS-12/5 @ \$36.26 x 15,240 x 30/60 minutes = \$276,301)

(GS-9/5 @ \$25.00 x 15,240 x 20/60 minutes = \$127,000)

(GS-3/5 @ \$13.14 x 15,240 x 5/60 minutes = \$ 16,688)

b. Production cost	\$200
c. Total cost to government	\$420,189

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 Forms 21-0781 and 21-0781a, may be reproduced and/or stocked by the respondents and veterans service organizations. These VA forms do not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of the forms. These forms are 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 Forms 21-0781 and 21-0781a.

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.