

Supporting Statement for VA Form Letter 21-914
Residency Verification Report—Veterans and Survivors
(2900-0655)

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. 107 allows Filipino veterans of the Special Philippine Scouts, Commonwealth Army of the Philippines, or organized guerilla groups to receive service-connected compensation benefits at the full-dollar rate if they reside in the United States as United States citizens or as aliens lawfully admitted for permanent residence. 38 U.S.C. 107 also allows their survivors to receive service-connected death benefits at the full-dollar rate if they meet the U.S. residency requirements. The regulatory basis is 38 C.F.R. 3.42.

2. VA Form Letter 21-914 is used to gather information which is necessary to verify whether a veteran or beneficiary who is receiving benefits at the full-dollar rate based on U.S. residency continues to meet the residency requirements. Continued eligibility to benefits at the full-dollar rate cannot be determined without complete information about a veteran's or beneficiary's residency.

3. The collection of information does not involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. VA Form Letter 21-914 is partially completed by VA with claimant-specific information before it is mailed to certain veterans and beneficiaries. To avoid improper use by veterans and beneficiaries who are not required to submit this form, the form is not available on the One-VA Website for downloading. A faxed copy of a properly signed VA Form Letter 21-914 may be accepted if there are no questions as to its validity. Currently, there has been no consideration of using other information technology. The Department will reconsider using other information technology when the resources become available, and usage of this form increases.

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 current information to determine initial and continuing eligibility for benefits. Without the information provided on this form, VA would be unable to determine continued eligibility to payment of benefits at the full-dollar rate, and benefits would not be properly paid.

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 September 12, 2007, pages 52199-52200. Outside consultations were not 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 1,250 per year.

b. Frequency of Response is once a year for most beneficiaries.

c. Annual burden is 417 hours.

d. The estimated completion time of 20 minutes is based on review by staff personnel.

e. The total estimated cost to respondents is \$6,255 (417 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 \$17,127

(GS-9/5 @ \$25.00 x 1,250 x 25/60 minutes = \$13,021)

(GS-3/5 @ \$13.14 x 1,250 x 15/60 minutes = \$ 4,106)

b. Printing and production cost \$25

c. Total cost to government \$17,152

15. There is no change in the reporting burden; this is the initial submission for this form.

16. The information collection is not for publication or tabulation use.

17. The collection instrument, VA Form Letter 21-914, 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 Letter 21-914.

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.