

Supporting Statement for Eligibility Verification Reports
(2900-0101)

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. 1315(e) and 1506 authorize VA to obtain a completed Eligibility Verification Report (EVR) annually from pension and Parents' Dependency and Indemnity Compensation (DIC) recipients to verify continued entitlement to benefits. Under 38 CFR 3.256 and 38 CFR 3.277 any individual who has applied for or receives pension or Parents' DIC must promptly notify VA in writing of any change in entitlement factors.

2. There are 16 EVR forms. One, VA Form 21-0510, Eligibility Verification Report Instructions, is the instructions for all EVR forms, and the other 15 are used to verify continued eligibility for pension and Parents' DIC and determine the proper rate of payment. The forms all request essentially the same information; however, in order to lessen the respondent burden, each EVR is tailored for the specific classes of beneficiaries of each of the four income-based benefit programs: Parents' DIC, Old Law Pension, Section 306 Pension, and Improved Pension. Six of the EVRs (VA Forms 21-0514, 21-0516, 21-0517, 21-0518, 21-0519C, and 21-0519S) are computer-generated forms which are dispatched annually from VA's central computer to certain recipients based on the criteria set out in 38 CFR 3.256 and 38 CFR 3.277. Nine of the forms are used by VA regional offices whenever a recipient loses the annual EVR or has to report changes in entitlement factors that are not in conjunction with an annual EVR submission. These Nine "-1" forms are (21-0512S-1, 21-0512V-1, 21-0513-1 (No computer-generated version of these forms), 21-0514-1, 21-0516-1, 21-0517-1, 21-0518-1, 21-0519C-1, and 21-0519S-1). Recipients of Old Law and Section 306 Pension are no longer routinely required to submit annual EVRs. VA only requires the submission of an annual EVR by recipients of Improved Pension or Parents' DIC in three instances: first; the Social Security Administration has not verified the beneficiary's Social Security number (SSN) and, if the beneficiary is married, his or her spouse's SSN; second, the beneficiary and his or her dependents receive income other than Social Security; and third, VA determines that submission of an EVR is necessary to preserve program integrity. The forms are also used to develop for current income and dependency information from claimants who have previously filed a claim for pension or Parents' DIC. It would be impossible to administer the pension and Parents' DIC programs without this collection of information.

3. VA Forms 21-0512S-1, 21-0512V-1, 21-0513-1, 21-0514-1, 21-0516-1, 21-0517-1, 21-0518-1, 21-0519S-1, and 21-0519C-1 are available on the One-VA web site in a fillable electronic format. The VA Form 21-0510 (EVR Instructions) is available on the One-VA web site. 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 form to be incorporated with an existing centralized legacy database. The Department is also in the process of adding VA Forms 21-0514-1, 21 0516-1, 21-0517-1, 21-0518-1, 21-0519S-1, and 21-0519C-1 to Veterans Online Applications (VONAPP) which allows applicants to view, print and submit applications electronically to VBA. VA Forms 21-0512S-1, 21-0512V-1, and 21-0513-1 are not being added to VONAPP because estimated total usage of these forms is minimal. The Department will reconsider adding these forms to VONAPP when the resources become available or if usage of this form becomes greater.

4. VA sends annual EVRs to any Improved Pension or Parents' DIC beneficiary whose SSN or whose spouse's SSN is not verified, or who has income other than Social Security. VA and SSA conduct a regular data exchange which provides VA with the amount of Social Security a beneficiary receives. If historically the beneficiary and his or her spouse have received no income other than Social Security and their SSNs have been verified as correct during the data exchange with SSA, we are confident that we can rely on the data exchange for information concerning changes in entitlement factors. However, if the beneficiary receives income other than Social Security or if the SSNs are not verified, we do not feel that we can rely on the electronic interfaces for timely information about changes in entitlement factors.

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

6. If the collection were not conducted or were conducted less frequently, VA would have no practical means of verifying continued entitlement to pension and Parents' DIC benefits. The EVR forms request information concerning a beneficiary's or claimant's income and net worth, dependency status, and other entitlement factors. Without this information, VA would be unable to properly pay pension and Parents' DIC.

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 April 11, 2008, (Volume 73, Number 71), pages 19939-19940. 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 219,000 per year:
197,550 for VA Forms 21-0512S-1, 21-0512V-1, 21-0513-1, 21-0514, 21-0514-1, 21-0516, 21-0516-1, 21-0518, 21-0518-1, 21-0519C, and 21-0519C-1; and
21,450 for VA Forms 21-0517, 21-0517-1, 21-0519S, and 21-0519S-1.
- b. Frequency of Response is once a year for most beneficiaries.
- c. Annual burden is 113,075 hours:
98,775 for VA Forms 21-0512S-1, 21-0512V-1, 21-0513-1, 21-0514, 21-0514-1, 21-0516, 21-0516-1, 21-0518, 21-0518-1, 21-0519C, and 21-0519C-1; and
14,300 for VA Forms 21-0517, 21-0517-1, 21-0519S, and 21-0519S-1.
- d. The estimated completion time of 30 minutes for VA Forms 21-0512S-1, 21-0512V-1, 21-0513-1, 21-0514, 21-0514-1, 21-0516, 21-0516-1, 21-0518, 21-0518-1, 21-0519C, and 21-0519C-1 is based on review by staff personnel and previous usage of these forms. The estimated completion time of 40 minutes for VA Forms 21-0517, 21-0517-1, 21-0519S, and 21-0519S-1 is based on review by staff personnel.
- e. The total estimated cost to respondents is \$1,696,125 (113,075 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	\$3,309,636
(GS-11/5 @ \$31.61 X 219,000 X 10/60 minutes = \$1,153,765)	
(GS-9/5 @ \$26.13 X 219,000 X 20/60 minutes = \$1,905,299)	
(GS-3/5 @ \$13.73 X 219,000 X 5/60 minutes = \$250,572)	
b. Printing and design cost	\$1,850
c. Total cost to government	\$3,311,486

15. There is no change in the respondent burden.

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

17. The collection instrument, VA EVR forms, 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 these 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 exception that waives the displaying of the expiration date on VA EVR forms.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This data collection does not employ statistical methods.