

Supporting Statement for VA Form 21-535
Application for Dependency and Indemnity Compensation by Parent(s)
(Including Accrued Benefits and Death Compensation, When Applicable)
(2900-0005)

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. 1121 and 1310 provide for payment of Dependency and Indemnity Compensation (DIC) or death compensation to parents of veterans whose deaths are service connected. Parents must also meet income limitations for DIC and death compensation. 38 U.S.C. 5121 provides for payment of accrued benefits. Information is requested by this form under the authority of 38 U.S.C. 501(a)(2).
2. VA Form 21-535 is used for the sole purpose of gathering the necessary information to determine a parent's eligibility, dependency and income, as applicable, for the death benefit sought.
3. VA Form 21-535 is available as a fillable form on the VBA website for downloading by claimants. Claimants may print and submit applications non-electronically. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. 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. Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. VA Form 21-535 is not currently available in VONAPP; however, the form is scheduled to be added to VONAPP when the resources become available.
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 claimants to file an application for benefits subsequent to the death of the veteran to determine eligibility for the benefit. Without this information, entitlement to benefits could not be determined.
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 October 21, 2008, pages 62588-62589. There were no comments received in response to this notice.
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" found in 42 Fed. Reg. 49726 (9/27//1977) with the detailed listing to be found on p.49760, 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 3,600 per year.

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

c. Annual burden is 4,320 hours.

d. The estimated completion time of 1 hour, 12 minutes is based on review by staff personnel and previous usage of this form.

e. The total estimated cost to respondents is \$64,800 (4,320 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 \$405,086

(GS-12/5 @ \$37.89 x 3,600 x 72/60 minutes = \$163,645)

(GS- 9/5 @ \$26.13 x 3,600 x 154/60 minutes = \$241,441)

b. Printing and production cost \$420

c. Total cost to government \$405,506

15. The reporting burden has not changed.

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

17. The collection instrument, VA Form 21-535, 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 21-535.

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.