

Supporting Statement for VA Form 21-0161a
Income Verification
(2900-0518)

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 survivors. Information is requested by this form under the authority of 38 U.S.C. 1506, which requires the accurate reporting of income, and 38 U.S.C. 6102, which prohibits fraudulent receipt of benefits.
2. VA Form 21-0161a is used to gather information to determine entitlement to income-dependent benefits.
3. The items of information submitted are not available in any other format which could be obtained through improved information technology. We are not planning to make this form available in electronic format for submission due to the low volume used as it would not be cost effective.
4. Program reviews were conducted to identify potential areas of duplication. However, none were found to exist.
5. The collection of information does involve small businesses or entities; however, every effort has been made to keep the reporting burden to a minimum.
6. The VA compensation and pension programs require the accurate reporting of income by those who are in receipt of income-dependent benefits. This form solicits information from employers of beneficiaries who have been identified as having inaccurately reported their income to VA.
7. There are no special circumstances requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on October 14, 2009, page 52840. 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 "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 (June 19, 2009).
11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

- a. Number of Respondents is estimate at 30,000 per year.
- b. Frequency of Response is generally one time.
- c. Annual burden is 15,000 hours.
- d. The estimated completion time of 30 minutes is based on review by experienced staff personnel and test usage of a comparable form.
- e. The total estimated cost to respondents is \$225,000 (15,000 hours at \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government.

a. Processing/Analyzing costs	\$2,411,995
$(GS-9/5 @ \$25.37 \times 30,000 \times 187/60 \text{ minutes} = \$2,372,095)$	
$(GS-3/5 @ \$13.30 \times 30,000 \times 6/60 \text{ minutes} = \$39,900)$	
b. Printing and production costs (\$18/thousand)	\$ 2,052
c. Total cost to the government	\$2,414,047

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 21-0161a, may be reproduced and/or stocked by the respondents and veterans service organizations. The 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 for approval 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 Form 21-0161a.

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

B. Collection of Information Employing Statistical Methods

The data collection does not employ statistical methods.