

SUPPORTING STATEMENT
VA FORM LETTER 29-459, REQUEST TO EMPLOYER FOR EMPLOYMENT
INFORMATION IN CONNECTION WITH A CLAIM FOR DISABILITY BENEFITS
2900-0066

A. JUSTIFICATION:

1. This form letter is used to request employment information in connection with a claim for disability insurance benefits. The information requested is authorized by law, Title 38 U.S.C. Section 1912, 1915, 1942 and 1948.
2. The data collected on the form letter is used by the Department of Veterans Affairs (VA) to establish the insured's eligibility for disability insurance benefits.
3. VA Form Letter 29-459 available on the One-VA web site in a fillable electronic format. 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 this 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. 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.
4. The information is not contained in any other VA records. Similar information is not available elsewhere.
5. The information does not involve any small businesses.
6. The form letter is designed for use by the insurance activity to determine the insured's eligibility for disability insurance benefits.
7. There are no special circumstances requiring that the collection be conducted in a manner inconsistent with the guidelines in 5 CFR Section 1320.6.
8. The Department notice was published in the Federal Register on June 24, 2010, pages 36154-36155. No comments were received in response to this notice.
9. The information collected is supplied by the respondent. No remuneration is made.
10. The information collection conforms with the Privacy Act of 1974 and is subject to the conditions of disclosure contained therein. The records are maintained in the system identified as 36VA00, "Veterans and Armed Forces Personnel United States Government Life Insurance Records - VA" as contained in the Privacy Act Issuances, 1993 Compilation.
11. There are no questions of a sensitive nature.
12. We estimate that approximately 5,167 form letters a year will be received. We also estimate that it will take approximately 10 minutes to complete this form. We arrived at this estimate by initiating a trial with a VA staff member unfamiliar with the form. The annual burden is 862 hours.

13. This submission does not involve any record keeping costs.

14. Cost to Government:

\$2,725.00	Estimated mailing cost (5,167 X 2 minutes per form letter X \$7.45/hour (average salary for station mail personnel) plus 5,167 form letters X 27.9 cents each (presort discount)).
\$2,725.00	Estimated cost for collections (5,167 X 4 minutes per form X \$7.91/hour (average salary of station collections personnel)).
\$14,894.00	Estimated cost for processing (5,167 forms X 15 minutes per form X \$11.53/hour (Average salary for reviewers)).
\$180.00	Estimated printing costs (6,000 X \$30/1,000 forms).
\$20,524.00	Total cost to the Government.
\$12,930.00	Cost to reporting public (862 hours X \$15/hour).

15. There is no change in respondent burden.

16. The information is collected for insurance purposes only and there are no plans for publication.

17. The collection instrument, VA Form Letter 29-459 may be reproduced and/or stocked by the respondents and veteran service organizations. This VA form does not display an expiration date, and if required to do so would result in unnecessary waste of existing stock of this form. This form is submitted to OMB for approval every three 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 this VA Form Letter.

18. There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS:

This collection of information does not employ statistical methods.