

Supporting Statement for VA Form 21-527
Veteran's Application for Pension
(2900-0002)

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. Title 38 U.S.C. 5101(a) provides that a specific claim in the form provided by the Secretary must be filed in order for benefits to be paid to any individual under the laws administered by the Secretary. VA Form 21-527 will become the prescribed form for disability pension claims. The particular nature of the changes made to this form is to remove the requirement of filling out a 21-526, if it is an original application for pension. The changes also incorporate plain English principles into the form, and thereby greatly improve the quality of applications and the respondent burden.
2. VA Form 21-527 is used to gather the necessary information to determine a veteran's eligibility and dependency, as applicable, for disability pension sought. Without this information, determination of entitlement would not be possible.
3. The Department is in process of adding several VA Forms to the Veterans Online Applications (VONAPP). VONAPP allows applicants to view, print, and submit applications electronically to VBA. VA Form 21-527 is one of the forms already available in the VONAPP.
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. This form was redesigned into a "user friendly" form, incorporating plain English, to comply with the President's Memorandum of June 1, 1998, Plain Language in Government Writing.
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 July 9, 2010, pages 39621-39622. No comments were received in response to this notice.
9. No payments or gifts to respondents have been made under this collection of information.
10. We are complying with the provisions of 38 U. S. C.5701 and the Privacy Act of 1974, and 5 U. S. C. 522a. The records are maintained in the appropriate Privacy System of Records identified "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended 75 FR 22187 (April 27, 2010).
11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

- a. Number of Respondents is estimated at 104,440 per year.
- b. Frequency of Response is one time for most beneficiaries.
- c. Annual burden is 104,440 hours.
- d. The estimated completion time of 60 minutes is based on review by staff personnel and previous usage of this form.
- e. The total estimated cost to respondents is \$1,566,600 (104,440 x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs	\$5,441,062
(GS-9/5 @ \$28.04 x 104,440 x 70/60 minutes =	\$3,416,580)
(GS-5/5 @ \$18.50 x 104,440 x 35/60 minutes =	\$1,127,082)
(GS-3/5 @ \$14.73 x 104,440 x 35/60 minutes =	\$ 897,400)
b. Printing and production cost	\$5,222
c. Total cost to government	\$5,446,284

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 21-527, 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 21-527.

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

B. Employing Statistical Methods

The data collection does not employ statistical methods.