

Supporting Statement for
Obligation to Report Factors Affecting Entitlement (38 CFR 3.204(a)(1),
38 CFR 3.256(a) and 38 CFR 3.277(b))
(2900-0624)

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. For VA compensation, pension and dependency and indemnity compensation (DIC) benefits, individual factors such as income, marital status, and number of dependents may affect a recipient's right to receive a benefit and the amount received.
2. 38 CFR 3.204(a)(1), 3.256(a) and 3.277(b) require that recipients report changes in entitlement factors to VA in a timely manner, so benefits are properly paid.
3. Recipients may report changes to VA using telephone, email, and facsimile as well as in writing. No standardized update form for this information is available that would encompass all the necessary information because these regulations may involve different types of VA benefits. VBA is currently hosting 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 forms to be incorporated with an existing centralized legacy database. Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. However, these regulations are not scheduled to be added to VONAPP because they are available for review on the Internet.
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. If the collection were not conducted, VA would have no means of determining entitlement to benefits and the rate payable. Benefits would not be properly paid, and overpayments could result.
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 October 12, 2010 at page 62634. 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 “Compensation, Pension, Education, and Rehabilitation Records—VA (58VA21/22/28)” as set forth in Privacy Act Issuances, 1993 compilation found in 74 Fed. Reg. 117 (June 19, 2009).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 372,209 per year.

b. Frequency of Response is on occasion for most beneficiaries.

c. Annual burden is 31,017 hours.

d. The estimated completion time of 5 minutes is based on review by staff personnel.

e. The total estimated cost to respondents is \$465,255 (31,017 hours x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government: \$123,493

15. There is no change in the reporting burden.

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 The information collection is not for publication or tabulation use.

17. This regulation may be reproduced and/or stocked by the respondents and veterans service organizations. This regulation does not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this regulation. This regulation 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 regulations.

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

B. Collection of Information Employing Statistical Methods

The Veterans Benefits Administration does not collect information employing statistical methods.