

Supporting Statement for VA Form 21-4138
Statement in Support of Claim
(2900-0075)

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. Information is requested by this form under the authority of 38 U.S.C. 501 and 38 C.F.R. 3.150.
2. VA Form 21-4138 is used by claimants to provide self-certified statements in support of various types of claims processed by the agency.
3. VA Form 21-4138 is 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 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. 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. The Department is in the process of adding VA Form 21-4138 to Veterans Online Applications (VONAPP), an application that allows applicants to view, print and submit applications electronically to VBA, pending availability of resources.
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 that statements submitted by or on behalf of a claimant contain certification by the respondent that the information provided is true and correct. This form is designed to facilitate claims processing by providing a uniform format for the certification statement.
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 May 11, 2011, page 27383. 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. 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 estimated at 752,000 per year.

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

c. Annual burden is 188,000 hours.

d. The estimated completion time of 15 minutes is based on review by staff personnel and previous usage of this form.

e. The total estimated cost to respondents is \$2,820,000 (188,000 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 \$27,639,509

(GS-12/5 @ \$40.66 x 752,000 x 15/60 minutes = \$ 7,644,080)

(GS-9/5 @ \$28.04 x 752,000 x 47/60 minutes = \$16,517,429)

(GS-5/5 @ \$18.50 x 752,000 x 15/60 minutes = \$ 3,478,000)

b. Printing and production cost \$22,560

c. Total cost to government \$27,662,069

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 21-4138, 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 21-4138.

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

B. Collection of Information Employing Statistical Methods

This submission does not employ statistical methods.