

Supporting Statement for VA Form 21-674, 21-674b, and 21-674c
Request for Approval of School Attendance (VA Forms 21-674 and 21-674c)
School Attendance Report (VA Form 21-674b)
(2900-0049)

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. Recipients of disability compensation, dependency and indemnity compensation, disability pension, and death pension are entitled to benefits for eligible children between the ages of 18 and 23 who attend approved courses of education or training. Information is requested by these forms under the authority of 38 U.S.C. 101 (4)(A). Regulatory authority is found in 38 CFR 3.277 and 3.667.
2. VA Forms 21-674, 21-674b, and 21-674c are used to gather the necessary information to determine initial and continued benefit entitlement to or for a child between the ages of 18 and 23 who is attending school. These forms are also used to report any changes in entitlement factors, including marriage, a change in course of instruction, and termination of school attendance. VA Form 21-674 and 21-674c are also used by recipients of pension to report the child's income. VA Form 21-674c is the computer-generated version of VA Form 21-674 and is automatically dispatched from VA's central computer approximately three months before a child's 18th birthday. VA Form 21-674b is used to confirm the school attendance of a child.
3. VA Forms 21-674 and 21-674b are available on the One-VA web site in a fillable electronic format. VA Form 21-674c is identical to VA Form 21-674; however, it is generated only from VA's central computer. VBA is currently hosting VA Forms 21-674 and 21-674b on a secure server and does not currently 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 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, VA Forms 21-674 and 21-674b are not currently scheduled to be added to VONAPP due to limited resources. The Department will reconsider adding these forms to VONAPP when the resources become available.
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. 38 U.S.C. 101 (4)(A) provides the authority to pay benefits to or for a child who attends an approved course of instruction or training between the ages of 18 and 23. VA Forms 21-

674, 21-674b, and 21-674c solicit information that is needed to determine eligibility to benefits for these children. Without this information, VA would be unable to properly authorize benefits.

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 3, 2011 at pages 61148-61149. 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 58VA21/22/28, "Compensation, Pension, Education, and Rehabilitation Records—VA" 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 177,500 per year:

138,000 for VA Forms 21-674 and 674c

39,500 for VA Form 21-674b

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

c. Annual burden is 37,792 hours:

34,500 hours for VA Forms 21-674 and 674c

3,292 hours for VA Form 21-674b

d. The estimated completion time of 15 minutes for VA Forms 21-674 and 674c is based on review by staff personnel and previous usage of these forms. The estimated completion time of 5 minutes for VA Form 21-674b is based on review by staff personnel and previous usage of this form.

e. The total estimated cost to respondents is \$566,880 (37,792 hours x \$15 per hour).

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

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$4,400,383

For VA Forms 21-674 and 21-674c:

(GS-11/5 @ \$33.92 x 138,000 x 10/60 minutes = \$ 780,160)

(GS-9/5 @ \$28.04 x 138,000 x 45/60 minutes = \$2,902,140)
(GS-3/5 @ \$14.73 x 138,000 x 5/60 minutes = \$ 169,395)

For VA Form 21-674b:

(GS-11/5 @ \$33.92 x 39,500 x 10/60 minutes = \$ 223,307)
(GS-9/5 @ \$28.04 x 39,500 x 15/60 minutes = \$276,895)
(GS-3/5 @ \$14.73 x 39,500 x 5/60 minutes = \$ 48,486)

b. Printing and production cost

For VA Form 21-674 and 21-674c: \$3,750
For VA Form 21-674b: \$905

c. Total cost to government \$4,405,038

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 Forms 21-674, 21-674b, and 21-674c, may be reproduced and/or stocked by the respondents and veterans service organizations. These VA forms do not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of this form. These VA forms are 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 21-674, 21-674b, and 21-674c.

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.