

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 is used for Veterans requesting to reopen their VA pension benefits and/or has applied for Compensation benefits and now applying for Pension benefits. VA Form 21-527EZ, *Fully Developed Claim*, is for a Veteran who wishes to file an original claim for pension under the Fully Developed program. This is an expedited claim process. The VA Form 21-526 is for Veterans who wished to apply for VA pension benefits, compensations, or both benefits at the same time. All three forms are necessary because they do three different tasks.
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. The system is scheduled to be released December 2012, with VA Form 21-526EZ being the first form to undergo electronic conversion. Once this form is released and reviewed, VA Form 21-527 is scheduled to be released April 2013. These forms are not yet available electronically.
4. VA Form 21-527, is used for Veterans who are reapplying for VA pension benefits or previous applied for VA compensation benefits and now applying for VA pension benefits. There are no duplicate forms and there is no department or agency that maintains the necessary information to determine if a Veteran qualifies for VA pension benefits.
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 April 6, 2012, at page 20888. 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. Statistical Methods

The data collection does not employ statistical methods.