

Supporting Statement for VA Form 21P-4165
Pension Claim Questionnaire for Farm Income
(2900-0095)

A. Justification

1. VA Form 21P-4165 has been transferred from Compensation Service (21) to Pension and Fiduciary Service (21P).
2. VA Form 21P-4165 is used to gather information which is necessary to determine the claimant's countable annual income and available assets due to farm operations. Eligibility to income-based benefits cannot be determined without complete information about a claimant's income. Farm income is not necessarily received on a weekly or monthly basis, and farm operating expenses must be considered in determining income and total assets.
3. VA Form 21P-4165 is available on the One-VA Website in a fillable electronic format. Claimants may print and submit forms non-electronically. The Veterans Online Applications (VONAPP) allows applicants to view, print and submit applications electronically to VBA. However, since the estimated total usage of this form is low, it is not one of the forms scheduled to be added to VONAPP. The Department will reconsider adding this form to VONAPP when the resources become available or if usage of this form becomes greater.
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 current information to determine initial and continuing eligibility for benefits. Without the information provided on this form, VA would be unable to determine initial and continuing eligibility to pension benefits for claimants who have farm income, and benefits would not be properly paid.
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 June 6, 2013, page 34174. Outside consultations were not solicited as no major changes are being made to the form. Field stations have not reported any difficulty on the part of respondents in using the form. No comments were received.
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 2,075 per year.
 - b. Frequency of Response is once a year for most beneficiaries.
 - c. Annual burden is 1,038 hours.
 - d. The estimated completion time of 30 minutes is based on review by staff personnel and previous usage of this form.
 - e. The total estimated cost to respondents is \$15,570 (1,038 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	\$30,502
(GS-9/5 @ \$28.04 x 1,038 x 55/60 minutes =	\$26,680)
(GS-3/5 @ \$14.73 x 1,038 x 15/60 minutes =	\$ 3,822)
b. Printing and production cost	\$100
c. Total cost to government	\$30,602
15. The reporting burden of 12,500 hours has decreased to 1,038 hours based on revised staff estimates of usage of this form. The previous estimate of 25,000 has not been revised for approximately 20 years, and during that time the number of independent farmers who are in receipt of VA income-based benefits has decreased substantially due to a nationwide decline in independent farming and a declining and aging veteran population. The estimated number of annual respondents is 2,075 rather than 25,000.
16. The information collection is not for publication or tabulation use.
17. The collection instrument, VA Form 21P-4165, 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 21P-4165.
18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

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