

Supporting Statement for VA Form 21P-509  
Statement of Dependency of Parent(s)  
(2900-0089)

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. 38 U.S.C. 102 requires that income and dependency must be determined before benefits may be paid to or for a dependent parent. Regulatory authority is found in 38 CFR 3.4 and 38 C.F.R. 3.250. Information is requested by this form under the authority of 38 U.S.C. 501(a)(2).

Form was transferred from Compensation Service to Pension and Fiduciary Service, therefore changing the form number from 21-509 to 21P-509. The 30-day FRN stated this was an extension. However, with the change to the form number and the addition of the expiration date placeholder, this is now a revision.

2. VA Form 21P-509 is used to gather income and dependency information from claimants who are seeking payment of benefits as or for a dependent parent. This information is necessary to determine dependency of the parent. The form is used by a veteran seeking to establish his/her parent(s) as dependents as well as by a surviving parent seeking death compensation.

3. VA Form 21P-509 is available on the VBA website as a fillable form. Claimants may print and submit applications non-electronically.

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 proof of age and/or relationship for payment of benefits. This form solicits information needed to determine eligibility to benefits for dependent parents. Without this information, it would not be possible for VA to authorize benefits to or for dependent parents.

7. There are no special circumstances requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

8. The Department notice was published in the Federal Register Volume 78, Number 117 on June 18, 2013, at pages 36642 and 36643. 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 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 8,000 per year.

b. Frequency of Response is one time for most beneficiaries.

c. Annual burden is 4,000 hours.

d. The estimated completion time of 30 minutes is based on review by staff personnel and previous usage of this form.

e. According to the U.S. Bureau of Labor Statistics, Average Hourly Earnings are \$24. The cost per respondent is \$12, making the total cost to the respondents an estimated \$96,000 (4,000 hours x \$24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$156,640

(GS-9/5 @ \$22.80 x 8,000 x 45/60 minutes = \$136,800)

(GS-3/5 @ \$14.88 x 8,000 x 10/60 minutes = \$ 19,840)

b. Printing and production cost \$8,400

VA sends out 8,000 forms a year. The cost to mail each form is \$.49 cents. The return mail cost is \$.49 cents/form. The print cost is \$.07 cents/form.

- 8,000 x \$.49 = \$3,920 (to mail the form to the claimant)
- 8,000 x \$.49 = \$3,920 (the return envelope (VA pays) for the claimant to return the form)
- It costs the VA \$.07 cents to print each form 8,000 x \$.07 = \$560.00

The total printing and production cost is \$3,920 + \$3,920 + \$560 = \$8,400

c. Total cost to government \$165,040

$\$156,640 + 8,400 = \$165,040$

15. The expiration date has been added to the form.

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

17. We are not seeking approval to omit the expiration date for OMB approval.

18. This submission does not contain any exceptions to the certification statementB.  
Collection of Information Employing Statistical Methods

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