

Supporting Statement for VA Form 21P-524  
Statement of Person Claiming To Have Stood In Relation of Parent  
(2900-0059)

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. 1315 provides for payment of survivors benefits to parents of deceased veterans. 38 C.F.R. 3.59 provides the information needed to determine whether a claimant stood in the relationship of father or mother. Information is requested by this form under the authority of 38 U.S.C. 501(a)(2). VA Form 21P, Statement of Person Claiming to Have Stood in Relation of Parent is being transferred from Compensation Service to Pension and Fiduciary Service, due to changes in business lines.
2. VA Form 21P-524 is used to gather information from claimants seeking survivors' benefits as persons who stood in relation of parent to deceased veterans.
3. VA Form 21P-524 is available on the One-VA Website in a fillable electronic format. VBA is currently hosting this form 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 form to be incorporated with an existing centralized legacy database.
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. In order for a person other than the natural parent of the deceased veteran to meet basic eligibility requirements for parents' survivors' benefits, it must be established that the claimant stood in relation of parent to the veteran. VA Form 21P-524 solicits such evidence. Without this information, entitlement to benefits could not be determined.
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 on October 31, 2013, Volume 7, No. 211, pages 65450 and 65451. 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 400 per year.

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

c. Annual burden is 800 hours.

d. The estimated completion time of 2 hours 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, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$19,200. (800 burden 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 \$7,949

(GS-9/5 @ \$28.04 x 400 x 30/60 minutes = \$5,608)

(GS-5/5 @ \$18.50 x 400 x 15/60 minutes = \$1,850)

(GS-3/5 @ \$14.73 x 400 x 5/60 minutes = \$ 491)

b. Printing and production cost \$100

c. Total cost to government \$8,049

15. There is no change in the reporting burden. The expiration date placeholder was 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 statement.

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.