

Supporting Statement for VA Form Letter 21-914
Residency Verification Report—Veterans and Survivors
(2900-0655)

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. 107 allows Filipino veterans of the Special Philippine Scouts, Commonwealth Army of the Philippines, or organized guerilla groups to receive service-connected compensation benefits at the full-dollar rate if they reside in the United States as United States citizens or as aliens lawfully admitted for permanent residence. 38 U.S.C. 107 also allows their survivors to receive service-connected death benefits at the full-dollar rate if they meet the U.S. residency requirements. The regulatory basis is 38 C.F.R. 3.42.

The 30-day FRN indicated this was an extension, however the minor revision to the form makes it a revision. The expiration date is being added to the form.

2. VA Form Letter 21-914 is used to gather information which is necessary to verify whether a veteran or beneficiary who is receiving benefits at the full-dollar rate based on U.S. residency continues to meet the residency requirements. Continued eligibility to benefits at the full-dollar rate cannot be determined without complete information about a veteran's or beneficiary's residency.
3. VA Form Letter 21-914 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 current information to determine initial and continuing eligibility for benefits. Without the information provided on this form, VA would be unable to determine continued eligibility to payment of benefits at the full-dollar rate, 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 December 17, 2013, Volume 78, No. 242, page 76411. 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 Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).
11. There are no questions of a sensitive nature.
12. Estimate of Information Collection Burden.
 - a. Number of Respondents totals = 1,250.
 - b. Frequency of Response is one time.
 - c. Annual burden total = 417 hours.
 - d. The estimated completion time is 20 minutes.
 - 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 \$10,008 (417 burden hours x \$24 per hour).
13. This submission does not include any recordkeeping costs. The total postage cost is \$612 (1,250 Respondents x 0.49 cents).
14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs	\$17,820
(GS-9/5 @ \$28.04 x 1,250 x 20/60 minutes = \$11,683)	
(GS-3/5 @ \$14.73 x 1,250 x 20/60 minutes = \$ 6,137)	
b. Form is available on the VA inter/intranet forms websites.	
c. Printing and production cost	\$5,490
d. Total cost to government	\$23,310
15. The reporting burden has not changed.

The form has been updated to include an expiration date placeholder.

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.