

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. VA Form 21-527 is available on the One-VA Website in a fillable electronic format. VBA is currently hosting these forms on a secure server and does not currently have the technology in place to allow for the complete submission of the forms. 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 forms to be incorporated with an existing centralized legacy database. Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. VA Form 21-527 is not currently available in VONAPP; however, the form is scheduled to be added to VONAPP when the resources become available.
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. 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 is estimated at 17,111 per year.

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

c. Annual burden is 17,111 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 \$256,655 (17,111 x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$891,440

(GS-9/5 @ \$28.04 x 17,111 x 70/60 minutes = \$559,758)

(GS-5/5 @ \$18.50 x 17,111 x 35/60 minutes = \$184,656)

(GS-3/5 @ \$14.73 x 17,111 x 35/60 minutes = \$147,026)

b. Printing and production cost (\$90 per thousand) \$1,540

c. Total cost to government \$892,980

15. There is a change in the annual expected number of respondents due to the Notice of Proposed Rulemaking (NPRM) RIN 2900-AO81, “Standard Claims and Appeals Forms” which proposes to require all claims for benefits to be submitted on an application or form

prescribed by the Secretary. VA is proposing to codify its regulations to standardize the use of all VA forms, to include VA Form 21-527. Currently, other than for the initial original claim, VA does not require that claimants submit any subsequent claim on a prescribed VA form. Although there is no substantive change in this form, VA expects a change in the number of respondents submitting VA Form 21-527 on account of VA's electronic claims processing system which will use another form, i.e., VA Form 21-527EZ, that contains the 38 U.S.C. 5103 notices to claimants. VA also expects that more respondents will be filing pension claims in the fully developed claim program which requires the use of VA Form 21-527EZ. The total estimated costs to respondents and to the federal government have changed as shown in paragraphs 12 and 14 of this statement.

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.