

Supporting Statement for VA Form 21-0304
Application for Spina Bifida Benefits
(2900-0572)

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. 1805 provides for payment of benefits for a child with spina bifida who is the natural child of a veteran who served in the Republic of Vietnam during the Vietnam era. 38 U.S.C. 1815 provides for payment of benefits for a child with certain birth defects who is the natural child of a female veteran who served in the Republic of Vietnam during the Vietnam era.
2. VA Form 21-0304 is used to gather the necessary information to determine eligibility for the monetary allowance and the appropriate level of payment. It would be impossible to administer this benefit program without this collection of information.
3. VA Form 21-0304 is available on the One-VA web site in a fillable electronic format. VBA maintains a secure server for forms of this type, but 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.

Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. However, VA Form 21-0304 is not one of the forms currently scheduled to be added to VONAPP because estimated total usage of this form is low and resources are limited. The Department will reconsider adding this form to VONAPP when the resources become available or if usage of this form increases.
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. VA Form 21-0304 is used to determine the monetary allowance for a child born with spina bifida or certain birth defects who is the natural child of a Vietnam veteran. Without this information, VA would be unable to effectively administer this law.
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 October 4, 2012, at 77 FR 60745. No outside consultations were 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 VA Form #21-0304. 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 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 430 per year.

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

c. Annual burden is 72 hours.

d. The estimated completion time of 10 minutes is based on review by staff personnel and previous usage of this form.

e. The total estimated cost to respondents is \$1,080 (72 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 \$22,402

(GS-9/5 @ \$28.04 x 430 x 70/60 minutes = \$14,067)

(GS-5/5 @ \$18.50 x 430 x 35/60 minutes = \$4,640)

(GS-3/5 @ \$14.73 x 430 x 35/60 minutes = \$3,695)

b. Printing and production cost (\$90 per thousand) \$39

c. Total cost to government \$22,441

15. There is no change in the reporting burden even with 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. However, the estimated costs to the federal government have been revised to reflect updated data.

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

17. The collection instrument, VA Form 21-0304, 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 21-0304.

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.