

Supporting Statement for VA Form 21-2680
Exam for Housebound Status or Permanent Need for Regular Aid and Attendance
(2900-0721)

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. Information is requested by this form under the authority of 38 U.S.C. 1114, 1521(d) and (e), 1115(1)(E), 1311(d), 1541(d) and (e). Regulatory authority is found in Title 38 CFR 3.351, 3.351(d), 3.351 (d)(2), 3.351(c)(2), 4.16, and 3.326(a).
2. VA Form 21-2680 is used to determine eligibility for the aid and attendance and/or housebound benefit. This form is maintained in the veteran's claims folder.
3. VA Form 21-2680 is available on the One-VA web site in a fillable electronic format. VBA is currently hosting this form on a secure server and does not 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 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. However, VA form 21-2680 is not currently scheduled to be added to VONAPP due to limited resources. The Department will reconsider adding this form to VONAPP when the resources become available.
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. This form is designed in a "user friendly" format, 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 September 21, 2011, pages 58565-58566. 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 14,000 per year.

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

c. Annual burden is 7,000 hours.

d. The estimated completion time of 30 minutes is based on review by staff personnel.

e. The total estimated cost to respondents is \$105,000 (7,000 hours x \$15/hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$641,340

(GS-12/5 @ \$40.66 x 14,000 x 30/60 minutes = \$284,620)

(GS-9/5 @ \$28.04 x 14,000 x 30/60 minutes = \$196,280)

(GS-7/5 @ 22.92 x 14,000 x 30/60 minutes = \$160,440)

b. Printing and production cost (\$90 per thousand) \$1,260

c. Total cost to government \$642,600

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 21-2680, may be not 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 will be 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. 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 seeks an exemption that waives the displaying of the expiration date on VA Form 21-2680.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

The data collection does not employ statistical methods.