

Supporting Statement for
VA Form 21-526EZ, Fully Developed Claim (Application for Compensation), VA Form 21-527EZ, Fully
Developed Claim (Application for Pension), VA Form 21-534EZ, Fully Developed Claim (Application
for DIC, Death Pension, and Accrued Benefits)
OMB Control Number 2900-0747

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. Public Law 110-389, Section 221 (a) required that VBA carry out the pilot study “Expedited Treatment of Fully Developed Claims” for a period of one-year. Based on data collected from the pilot, VBA has created a modified version program and expanded it to all 57 regional offices under the title “Fully Developed Claim Program”.

2. VA Form 21-526EZ, Application for Disability Compensation and Related Compensation Benefits, and VA Form 21-527EZ, Application for Pension, are the prescribed forms for disability compensation and pension claims, respectively, claimed under the FDC Program. The VA Form 21-534EZ serves as the prescribed form for Dependency and Indemnity Compensation (DIC), death pension, and accrued benefit claims claimed under the FDC Program. These forms are required as part of the FDC Program Transformation Initiative.

There may be reductions to the burden impacts that VA cannot assess at this time. VA plans to add VA Forms 21-527EZ and 21-534EZ to the eBenefits website. The website is designed to auto-populate information of record into the VBA systems, reducing a claimant’s burden in completing an application for benefits. The auto-populate feature of the website for these forms is not fully functional. As a result, VA has not had the opportunity to evaluate its effectiveness in reducing the burden impact.

3. VA Forms 21-526EZ is currently available on the VBA website for downloading by claimants and VA Forms 21-527EZ, and 21-534EZ will be available on the VBA website. Claimants may print and submit applications non-electronically. The Department is in the process of adding VA Forms to the [eBenefits website](#). The eBenefits website will allow applicants to view, print, and submit applications electronically to VBA. The eBenefits website will also auto-populate into an application information of record in the VBA systems, reducing a claimant’s burden in completing an application for benefits. VA Forms 21-527EZ, and 21-534EZ are forms VA plans to add to the eBenefits website.

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 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 June 15, 2011, page 35086. 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 1,048,652 per year (835,910 for VA Form 21-526EZ; 101,086 for VA Form 21-527EZ; and 111,656 for VA Form 21-534EZ).
- b. Frequency of Response is one time for most beneficiaries.
- c. Annual burden is 440,434 hours (351,082 for VA Form 21-526EZ; 42,456 for VA Form 21-527EZ; and 46,896 for VA Form 21-534EZ).
- d. The estimated completion time of 25 minutes for each form is based on review by staff personnel.
- e. The total estimated cost to respondents is \$6,606,508 (440,434 hours x \$15).
13. This submission does not involve any recordkeeping costs.
14. Estimated Costs to the Federal Government:
- a. Processing/Analyzing costs \$26,771,212
- VA Form 21-526EZ
 (GS-11/5@ \$33.92 x 835,910 x 25/60 minutes = \$9,766,215)
 (GS-9/5 @ \$28.04 x 835,910 x 25/60 minutes = \$6,443,473)
 (GS-5/5 @ \$18.50 x 835,910 x 25/60 minutes = \$5,130,398)
- VA Form 21-527EZ
 GS-11/5@ \$33.92 x 101,086 x 25/60 minutes = \$1,181,021)
 (GS-9/5 @ \$28.04 x 101,086 x 25/60 minutes = \$779,205)
 (GS-5/5 @ \$18.50 x 101,086 x 25/60 minutes = \$620,415)
- VA Form 21-534EZ
 (GS-11/5@ \$33.92 x 111,656 x 25/60 minutes = \$1,304,514)
 (GS-9/5 @ \$28.04 x 111,656 x 25/60 minutes = \$860,682)
 (GS-5/5 @ \$18.50 x 111,656 x 25/60 minutes = \$685,289)
- b. Printing and production cost (\$90 per thousand) \$94,379
- c. Total cost to government \$26,865,591

15. The increase in burden is 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 Forms 21-526EZ, 21-527EZ and 21-534EZ. 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 these forms, VA expects a substantial increase in the number of respondents submitting VA Forms 21-526EZ, 21-527EZ, and 21-534EZ on account of VA's electronic claims processing system which uses these forms and expects an increase in the annual number of respondents filing compensation, pension, and death claims in VA's fully developed claim program which requires submission on these forms. The total estimated costs to respondents and 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 instruments, VA Forms 21-526EZ, 21-527EZ, and 21-534EZ, may be reproduced and/or stocked by the respondents and Veterans Service Organizations. These VA forms do not display an expiration date, and if required to do so would result in unnecessary waste of existing stocks of the forms. These forms are 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 Forms 21-526EZ, 21-527EZ, and 21-534EZ.

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

B. Collection of Information Employing Statistical Methods

The data collection does not collect information employing statistical methods.