Supporting Statement for VA Form 21P-0784
Supplemental Income Questionnaire (For Philippine Claims Only)
(2900-0668)

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. Eligibility to benefits may be established based on service in the Philippine Scouts, Commonwealth Army of the Philippines, or recognized guerrilla organizations (38 U.S.C. 107). Title 38 U.S.C. 1521, 1541, and 1542 provide for payment of pension to eligible veterans, surviving spouses, and surviving children.   A claimant's eligibility for pension is determined, in part, by countable family income and net worth. Income information is requested by this form under the authority of 38 U.S.C. 1506. Regulatory authority is found in 38 CFR 3.262 and 3.271. VA Form 21P-0784, Supplemental Income Questionnaire (For Philippine Claims Only), is being transferred from Compensation Service to Pension and Fiduciary Service, due to changes in business lines.

2. VA Form 21P-0784 will be used to gather income information that is necessary to determine eligibility for pension. Entitlement to pension cannot be determined without complete information about a claimant's family income and net worth. Philippine claimants residing in the Philippines have different types of income than claimants residing in the U.S.A., and the income questions on VA Forms 21-526, 21p-527, and 21-534 are inadequate to determine all sources of income for these claimants. For example, claimants may receive income from the Philippine and American governments or rental income in the form of fish or produce. In many cases, this has resulted in multiple development letters being sent to claimants in an effort to properly determine income sources and amounts.

Very few claimants need to provide the additional information requested by this form; therefore, this separate form has been created to avoid increasing the burden for the majority of our claimants.   When a Philippine claimant residing in the Philippines applies for pension using VA Form 21-526, 21P-527, or 21-534 and the sources and amounts of family income are not clear, VA Form 21P-0784 will be used. Use of this form will reduce the need for repeated requests for clarification about income, which will improve customer service and expedite claims processing.   Accurate information about all sources of income will also reduce overpayments.

3. VA Form 21P-0784 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. VA and SSA conduct a regular data exchange which provides VA with the amount of Social Security a beneficiary receives. However, this applies only Social Security benefits received from the U.S.A. VA does not conduct data exchanges with Philippine government agencies, and the claimants who will be completing VA Form 21P-0784 have other sources of income in addition to U.S. Social Security.

5. The collection of information does not involve small businesses or entities.

6. VA Form 21P-0784 will be used to determine eligibility for pension for Philippine claimants who reside in the Philippines, both veterans and their surviving spouses and children. Without the income information collected with this form, entitlement to benefits would not be properly authorized, and overpayments would result.

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 January 16, 2014, Volume 79, No. 11, pages 2940-2941. No comments were received in response to this notice.

9. No payments or gifts to respondents will be made under this collection of information.

10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22/28, ''Compensation, Pension, Education, and Rehabilitation Records—VA ''as set forth in Privacy Act Issuances, 1993 compilation found in 74 Fed. Reg. 117 (June 19, 2009).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 120 per year.

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

c. Annual burden is 30 hours.

d. The estimated completion time of 15 minutes is based on review by staff personnel.

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 $720 (30 hours x $24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs $2,847

    (GS-12/5 @ $40.66 x 120x 20/60 minutes = $1,626)
    (GS-10/5 @ $30.88 x 120x 15/60 minutes = $ 926)
    (GS-3/5 @ $14.73 x 120x 10/60 minutes = $ 295)

b. Design, printing and production cost $780

c. Total cost to government $3,627

15. There is no change in burden hour. The expiration date placeholder has been added to the form.

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. <u>Collection of Information Employing Statistical Methods</u>

1. This collection of information does not employ statistical methods.