

Supporting Statement for VA Form 21P-0571  
Application for Exclusion of Children's Income  
(2900-0510)

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, including the Improved Pension program. A veteran's or surviving spouse's rate of Improved Pension is determined by family income. Normally, income of children who are members of the household is included in this determination. However, children's income may be excluded if it is unavailable or if consideration of that income would cause hardship. 38 U.S.C. 1521(h) and 1541(g) provide the authority for the exclusion of children's income based on unavailability or hardship. VA Form 21P-0571, Application for Exclusion of Children's Income, is being transferred from Compensation Service to Pension and Fiduciary Service, due to changes in business lines.
2. VA Form 21P-0571 is used for the sole purpose of collecting the information needed to determine whether children's income is available to the beneficiary, and if it would cause hardship to consider their income.
3. VA Form VA Form 21P-0571 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.
5. The collection of information does not involve small businesses or entities.
6. 38 CFR 3.23(d) provides the criteria for determining whether children's income is available to the beneficiary, and if it would cause hardship to consider their income. VA Form 21-0571 solicits information needed to make these determinations. Without this information, VA would be unable to determine whether a child's income should be excluded, and pension benefits would not be properly paid.
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 July 7, 2014, Volume 79, No. 129, page 38362. 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 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 2,700 per year.

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

c. Annual burden is 2,025 hours.

d. The estimated completion time of 45 minutes is based on review by staff personnel and previous usage of this form.

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 respondents an estimated \$48,600 (2,025 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 \$94,897

(GS-12/5 @ \$40.66 x 2,700 x 15/60 minutes = \$27,445)

(GS-9/5 @ \$28.04 x 2,700 x 45/60 minutes = \$56,781)

(GS-3/5 @ \$14.73 x 2,700 x 15/60 minutes = \$ 9,942)

b. Printing and production cost \$150

c. Total cost to government \$95,047

15. The reporting burden has not changed. 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. Collection of Information Employing Statistical Methods**

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