

Supporting Statement for:

(2900-0390)

VA Form 21-8924	Application of Surviving Spouse or Child for REPS Benefits (Restored Entitlement Program for Survivors)
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A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), oversees an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. VA administers the Restored Entitlement Program for Survivors (REPS). This program pays VA benefits to certain surviving spouses and children of veterans who died in service prior to August 13, 1981 or who died as a result of a service-connected disability incurred or aggravated prior to August 13, 1981. The program is funded by the Department of Defense (DoD). Decisions as to entitlement are made by VA using Social Security Administration (SSA) entitlement criteria. Information is requested by this form under the authority of 38 U.S.C. 5101. Regulatory authority is found in 38 C.F.R. Sec. 3.812. The expiration date is being added to the form.

The Final Rule RIN 2900-AO81, *Standard Claims and Appeals Forms*, which requires all claims for benefits to be submitted on an application or form prescribed by the Secretary. VA is codifying its regulations to standardize the use of all VA forms, to include VA Forms 21-8924.

2. VA Form 21-8924 is used by survivors of deceased veterans to claim REPS benefits. The information on the form is necessary to determine if the applicant meets REPS eligibility criteria.
3. VA Form 21-8924 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. VA Form 21-8924 solicits information that is necessary to determine eligibility for REPS benefits. If the collection were not conducted, VA would be unable to properly authorize REPS benefits.
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 12, 2014, Volume 79, No. 113, pages 33809 and 33810. No comments were received in response to this notice.

The Department notice was published in proposed rule, RIN 2900-AO81, *Standard Claims and Appeals Forms*, in the Federal Register on October 31, 2013, Vol. 78, No. 211, pages 65490-65509. 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 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 1,800.
 - b. Frequency of Response is one time.
 - c. Annual burden is 600 hours.
 - d. The estimated completion time of 20 minutes.
 - 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 an estimated \$14,400 (600 burden hours x \$24 per hour).
13. VA recognizes there may be costs with 3rd party assistance. VA requests input from the public.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs	\$50,058
(GS- 12/5 @ \$40.66 x 1,800 x 20/60 minutes = \$24,396)	
(GS- 9/5 @ \$28.04 x 1,800 x 20/60 minutes = \$16,824)	
(GS- 3/5 @ \$14.73 x 1,800 x 20/60 minutes = \$ 8,838)	
b. Forms are available on the VA inter/intranet forms websites.	
c. Printing and production cost (\$90/thousand)	\$660
d. Total cost to government	\$50,718

15. There is no change in the reporting burden even with the Final Rulemaking RIN 2900-AO81, *Standard Claims and Appeals Forms*, which requires 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.

The expiration date is being added to the form.

16. We are not seeking approval to omit the expiration date for OMB approval.

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

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.