

Supporting Statement for Eligibility Verification Reports  
(2900-0101)

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. 38 U.S.C. 1315(e) and 1506 authorize VA to obtain a completed Eligibility Verification Report (EVR) annually from pension and Parents' Dependency and Indemnity Compensation (DIC) recipients to verify continued entitlement to benefits. Less than 38 CFR 3.256 and 38 CFR 3.277 any individual who has applied for or receives pension or Parents' DIC must promptly notify VA in writing of any change in entitlement factors.

The 30-day notice, published in the Federal Register on Wednesday, December 24, 2014, (Federal Register Volume 79, Number 247, pages 77599 to 77600) contained minor errors in the paragraphs discussing the estimated annual burden, estimated average burden per respondent, and estimated number of respondents. The figures in these paragraphs are correct, but the form numbers listed are inaccurate. The paragraphs should read as follows:

*“Estimated Annual Burden:* 113,075 total hours. 98,775 hours for VA Form 21P-0512S-1, VA Form 21P-0512V-1, VA Form 21P-0513-1, VA Form 21P-0514-1, VA Form 21P-0516-1, VA Form 21-0518-1, and VA Form 21P-0519C-1. 14,300 hours for VA Form 21P-0517-1 and VA Form 21-0519S-1.”

*“Estimated Average Burden per Respondent:* The estimated burden per respondent is 30 minutes (0.50 hours) for VA Form 21P-0512S-1, VA Form 21P-0512V-1, VA Form 21P-0513-1, VA Form 21P-0514-1, VA Form 21P-0516-1, VA Form 21-0518-1, and VA Form 21P-0519C-1. The estimated burden per respondent is 40 minutes (0.67 hours) for VA Form 21P-0517-1 and VA Form 21-0519S-1.”

*“Estimated Number of Respondents:* 219,000 total respondents. The estimated number of respondents is 197,550 for VA Form 21P-0512S-1, VA Form 21P-0512V-1, VA Form 21P-0513-1, VA Form 21P-0514-1, VA Form 21P-0516-1, VA Form 21-0518-1, and VA Form 21P-0519C-1. The estimated number of respondents is 21,450 for VA Form 21P-0517-1 and VA Form 21-0519S-1.”

2. There are 10 Eligibility Verification Report (EVR) forms. One of the ten forms is VA Form 21P-0510, *Eligibility Verification Report Instructions*, which provides the instructions for all the EVR forms. The other 9 forms are used to verify continued eligibility for pension and Parents' DIC and determine the proper rate of payment. The forms all request essentially the same information; however, in order to minimize the respondent burden, each EVR is tailored for the specific class of beneficiaries of each of the four income-based benefit programs: Parents' DIC, Old Law Pension, Section 306 Pension, and Improved Pension. These forms are used by the VA Pension Management Centers whenever a recipient has to report changes in entitlement factors or requests to

reopen a terminated claim. The nine “-1” forms are (21P-0512S-1, 21P-0512V-1, 21P-0513-1, 21P-0514-1, 21P-0516-1, 21P-0517-1, 21P-0518-1, 21P-0519C-1 and 21P-0519S-1). All of the 10 EVR forms except for VA Form 21P-0512V-1 have an equivalent form that has been translated into Spanish (for use at the VA San Juan, Puerto Rico regional office) which brings the total number of EVR forms to 19.

3. These forms are available on the One-VA Website in a fillable electronic format. VBA is currently hosting these forms 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 the Department of Veterans Affairs (VA).

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

6. If the collection were not conducted or were conducted less frequently, VA would have no practical means of verifying continued entitlement to pension and Parents' DIC benefits. The EVR forms request information concerning a beneficiary's or claimant's income and net worth, dependency status, and other entitlement factors. Without this information, VA would be unable to properly pay pension and Parents' DIC.

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 October 2, 2014, Vol. 79 No. 191, pages 59559-59560. 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.

**VA Forms 21P-0510 *Eligibility Verification Report Instructions* and VA Forms 21P-0510 *Eligibility Verification Reports (Spanish)***

- a. Number of Respondents: Average number of respondents per year – no respondents (instruction form only)
- b. Frequency of Response: Never
- c. Annual Burden Hours: N/A
- d. Estimated Completion Time: N/A
- e. This is not a fillable form; it is an instructions form. The respondents have no reporting costs associated with this form.

**VA Form 21P-0512S-1 *Old Law and Section 306 Eligibility Verification Report (Surviving Spouse)* and VA Form 21P-0512S-1 *Old Law and Section 306 Eligibility Verification Report (Surviving Spouse)(Spanish)***

- a. Number of Respondents: Average number of respondents per year – 28,221
- b. Frequency of Response: Annually
- c. Annual Burden Hours: 14,110.50 hrs.
- d. Estimated Completion Time: 0.50 hrs. (30 minutes)
- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,652.00 (14,110.50 burden hrs. x \$24.00 per hour).

**VA Form 21P-0512V-1 *Old Law and Section 306 Eligibility Verification Report (Veteran)***

- a. Number of Respondents: Average number of respondents per year – 28,221
- b. Frequency of Response: Annually
- c. Annual Burden Hours: 14,110.50 hrs.
- d. Estimated Completion Time: 0.50 hrs. (30 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,652.00 (14,110.50 burden hrs. x \$24.00 per hour).

**VA Form 21P-0513-1 *Old Law and Section 306 Eligibility Verification Report (Children Only)* and VA Form 21P-0513-1 *Old Law and Section 306 Eligibility Verification Report (Children Only) (Spanish)***

a. Number of Respondents: Average number of respondents per year – 28,221

b. Frequency of Response: Annually

c. Annual Burden Hours: 14,110.50 hrs.

d. Estimated Completion Time: 0.50 hrs. (30 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,652.00 (14,110.50 burden hrs. x \$24.00 per hour).

**VA Form 21P-0514-1 *DIC Parent's Eligibility Verification Report* and VA Form 21P-0514-1 *DIC Parent's Eligibility Verification Report (Spanish)***

a. Number of Respondents: Average number of respondents per year – 28,221

b. Frequency of Response: Annually

c. Annual Burden Hours: 14,110.50 hrs.

d. Estimated Completion Time: 0.50 hrs. (30 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,652.00 (14,110.50 burden hrs. x \$24.00 per hour).

**VA Form 21P-0516-1 *Improved Pension Eligibility Verification Report* and VA Form 21P-0516-1 *Improved Pension Eligibility Verification Report (Spanish)***

a. Number of Respondents: Average number of respondents per year – 28,222

b. Frequency of Response: Annually

c. Annual Burden Hours: 14,111.00 hrs.

d. Estimated Completion Time: 0.50 hrs. (30 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,664.00 (14,111.00 burden hrs. x \$24.00 per hour).

**VA Form 21P-0518-1 Improved Pension Eligibility Verification Report (Surviving Spouse with No Children) and VA Form 21P-0518-1 Improved Pension Eligibility Verification Report (Surviving Spouse with No Children) (Spanish)**

a. Number of Respondents: Average number of respondents per year – 28,222

b. Frequency of Response: Annually

c. Annual Burden Hours: 14,111.00 hrs.

d. Estimated Completion Time: 0.50 hrs. (30 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,664.00 (14,111.00 burden hrs. x \$24.00 per hour).

**VA Form 21P-0519C-1 Improved Pension Eligibility Verification Report (Child or Children) and VA Form 21P-0519C-1 Improved Pension Eligibility Verification Report (Child or Children) (Spanish)**

a. Number of Respondents: Average number of respondents per year – 28,222

b. Frequency of Response: Annually

c. Annual Burden Hours: 14,111.00 hrs.

d. Estimated Completion Time: 0.50 hrs. (30 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$338,664.00 (14,111.00 burden hrs. x \$24.00 per hour).

**VA Form 21P-01517-1 Improved Pension Eligibility Verification Report (Veteran with Children) and VA Form 21P-0517-1 Improved Pension Eligibility Verification Report (Veteran with Children) (Spanish)**

a. Number of Respondents: Average number of respondents per year – 10,725

b. Frequency of Response: Annually

c. Annual Burden Hours: 7,150.00 hrs.

d. Estimated Completion Time: 0.67 hrs. (40 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$171,600.00 (7,150.00 burden hrs. x \$24.00 per hour).

**VA Form 21P-0519S-1 Improved Pension Eligibility Verification Report (Surviving Spouse with Children) and VA Form 21P-0519S-1 Improved Pension Eligibility Verification Report (Surviving Spouse with Children) (Spanish)**

a. Number of Respondents: Average number of respondents per year – 10,725

b. Frequency of Response: Annually

c. Annual Burden Hours: 7,150.00 hrs.

d. Estimated Completion Time: 0.67 hrs. (40 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$171,600.00 (7,150.00 burden hrs. x \$24.00 per hour).

**Total Respondent Burden and Costs, All Forms**

a. Number of Respondents: Average number of respondents per year – 219,000

b. Frequency of Response: Annually

c. Annual Burden Hours: 113,075 hrs.

d. Average Estimated Completion Time: 0.516324201 hrs. (Approx. 31 minutes)

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24.00 per hour, making the total cost to the respondents an estimated \$2,713,800.00 (113,075.00 burden hrs. x \$24.00 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs	\$3,553,822
(GS-11/5 @ \$33.92 X 219,000 X 10/60 minutes = \$1,238,080)	
(GS-9/5 @ \$28.04 X 219,000 X 20/60 minutes =	\$2,046,920)
(GS-3/5 @ \$14.73 X 219,000 X 5/60 minutes =	\$268,822)
b. Printing and design cost	\$0.00
c. Total cost to government	\$3,553,822

15. The forms have been revised to show the new form number prefix (21P). The expiration date placeholder has also been added to these forms.

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.