

Supporting Statement for VA Form 21-4185
(2900-0108)

VA Form 21-4185	Report of Income from Property or Business
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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, survivors and/or beneficiaries. A claimant's eligibility for pension or Parents' Dependency and Indemnity Compensation (DIC) is determined, in part, by countable income. Information is requested by this form under the authority of 38 U.S.C. 1315 and 1506. The regulatory basis is 38 C.F.R. 3.262 and 3.271.

There was an error on the 30-day Federal Register Notice. The number of respondents should have been 7,000 and the annual burden hours should have been 3,500.

2. VA Form 21-4185 is used to gather information that is necessary to determine a claimant's countable income received from rental property and/or operation of a business. Some expenses associated with rental property and business operation are deductible from the gross income received. Complete information about expenses and income is necessary in order to determine the net amount of income that is countable. The information is used to determine eligibility for VA benefits, and, if eligibility exists, the proper rate of payment.
3. VA Form 21-4185 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 21-4185 is used by veterans and survivors to report business and/or property income and expenses. Without this information, VA would be unable to determine initial and continuing eligibility to income-based benefits for claimants who have income from rental property or business, and 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 August 28, 2014, Volume 79, No. 167, page 51399. 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 yearly respondents totals 7,000.
 - b. Frequency of Response is one time.
 - c. Annual burden total: 3,500 hours.
 - d. The estimated completion time is 30 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 \$84,000 (3,500 burden 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	\$318,920
(GS-12/5 @ \$48.35 x 7,000 x 30/60 minutes = \$169,225)	
(GS-9/5 @ \$28.04 x 7,000 x 30/60 minutes = \$ 98,140)	
(GS-3/5 @ \$14.73 x 7,000 x 30/60 minutes = \$ 51,555)	
b. Printing and production cost	\$5,490
c. Total cost to government	\$324,410

15. The reporting burden has not changed. The form has been updated to include the expiration date.

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

This collection of information does not employ statistical methods.