

Supporting Statement for:

(2900-0049)

VA Form 21-674	Request for Approval of School Attendance
VA Form 21-674b	School Attendance Report
VA Form 21-674c	Request for Approval of School Attendance

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. Recipients of disability compensation, dependency and indemnity compensation, disability pension, and death pension are entitled to benefits for eligible children between the ages of 18 and 23 who attend approved courses of education or training. Information is requested by these forms under the authority of 38 U.S.C. 101 (4)(A). Regulatory authority is found in 38 CFR 3.277 and 3.667.
2. VA Forms 21-674, 21-674b, and 21-674c are used to gather the necessary information to determine initial and continued benefit entitlement to or for a child between the ages of 18 and 23 who is attending school. These forms are also used to report any changes in entitlement factors, including marriage, a change in course of instruction, and termination of school attendance. VA Form 21-674 and 21-674c are also used by recipients of pension to report the child's income. VA Form 21-674c is the computer-generated version of VA Form 21-674 and is automatically dispatched from VA's central computer approximately three months before a child's 18th birthday. VA Form 21-674b is used to confirm the school attendance of a child.
3. VA Forms 21-674, 21-674b, and 21-674c are 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 U.S.C. 101 (4)(A) provides the authority to pay benefits to or for a child who attends an approved course of instruction or training between the ages of 18 and 23. VA Forms 21-674, 21-674b, and 21-674c solicit information that is needed to determine eligibility to benefits for these children. Without this information, VA would be unable to properly authorize 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 October 2, 2014 Volume 79, No. 191, pages 59555 and 59556. 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: 177,500 per year:
 - 138,000 for VA Forms 21-674 and 674c
 - 39,500 for VA Form 21-674b
 - b. Frequency of Response is on occasion for most beneficiaries.
 - c. Annual burden: 37,792 hours:
 - 34,500 hours for VA Forms 21-674 and 674c
 - 3,292 hours for VA Form 21-674b
 - d. Estimated completion time is 15 minutes for VA Forms 21-674 and 674c.

Estimated completion time is 5 minutes for VA Form 21-674b.
 - 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 \$907,008 (37,792 burden hours x \$24 per hour).
13. This submission does not involve any record keeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs	\$4,400,383
• For VA Forms 21-674 and 21-674c:	
(GS-11/5 @ \$33.92 x 138,000 x 10/60 minutes =	\$ 780,160)
(GS-9/5 @ \$28.04 x 138,000 x 45/60 minutes =	\$2,902,140)
(GS-3/5 @ \$14.73 x 138,000 x 5/60 minutes =	\$ 169,395)
• For VA Form 21-674b:	
(GS-11/5 @ \$33.92 x 39,500 x 10/60 minutes =	\$223,307)
(GS-9/5 @ \$28.04 x 39,500 x 15/60 minutes =	\$276,895)
(GS-3/5 @ \$14.73 x 39,500 x 5/60 minutes =	\$ 48,486)
b. Printing and production cost	
• For VA Form 21-674 and 21-674c:	\$3,750
• For VA Form 21-674b:	\$905
c. Total cost to government	\$4,405,038

15. The reporting burden has not changed.

The form has been updated to include an expiration date placeholder.

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

The data collection does not employ statistical methods.