

Supporting Statement for:

(2900-0721)

VA Form 21-2680	Exam for Housebound Status or Permanent Need for Regular Aid and Attendance
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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 and/or beneficiaries. Information is requested by this form under the authority of 38 U.S.C. 1114, 1521(d) and (e), 1115(1)(E), 1311(d), 1541(d) and (e). Regulatory authority is found in Title 38 CFR 3.351, 3.351(d), 3.351 (d)(2), 3.351(c)(2), 4.16, and 3.326(a).

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 Form 21-2680.

2. VA Form 21-2680 is used to determine eligibility for the aid and attendance and/or housebound benefit. This form is maintained in the veteran's claims folder.
3. VA Form 21-2680 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. This form is designed in a "user friendly" format, incorporating plain English, to comply with the President's Memorandum of June 1, 1998, Plain Language in Government Writing.
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 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: 14,000 per year
 - b. Frequency of Response is one time.
 - c. Annual burden: 7,000 hours
 - d. Estimated completion time: 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 \$168,000 (7,000 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 \$641,340
 - (GS-12/5 @ \$40.66 x 14,000 x 30/60 minutes = \$284,620)
 - (GS-9/5 @ \$28.04 x 14,000 x 30/60 minutes = \$196,280)
 - (GS-7/5 @ 22.92 x 14,000 x 30/60 minutes = \$160,440)
 - b. Forms are available on the VA inter/intranet forms websites.
 - c. Printing and production cost (\$90/thousand) \$7,126
 - d. Total cost to government \$648,466

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 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.