

Supporting Statement for VA Form 21-527
Veteran's Application for Pension
(2900-0002)

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. Title 38 U.S.C. 5101(a) provides that a specific claim in the form provided by the Secretary must be filed in order for benefits to be paid to any individual under the laws administered by the Secretary. VA Form 21-527 is used for Veterans requesting to reopen their VA pension benefits and/or has applied for Compensation benefits and now applying for Pension benefits. VA Form 21-527EZ, *Fully Developed Claim*, is for a Veteran who wishes to file an original claim for pension under the Fully Developed program. This is an expedited claim process. The VA Form 21-526 is for Veterans who wished to apply for VA pension benefits, compensations, or both benefits at the same time. All three forms are necessary because they do three different tasks. Please add DOMA language to form.
2. VA Form 21-527 is used to gather the necessary information to determine a veteran's eligibility and dependency, as applicable, for disability pension sought. Without this information, determination of entitlement would not be possible.
3. VA Form VA Form 21-527 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. VA Form 21-527, is used for Veterans who are reapplying for VA pension benefits or previous applied for VA compensation benefits and now applying for VA pension benefits. There are no duplicate forms and there is no department or agency that maintains the necessary information to determine if a Veteran qualifies for VA pension benefits.
5. The collection of information does not involve small businesses or entities.
6. This form was redesigned into a "user friendly" form, 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 the Federal Register on (Insert Date) (Volume ____, No. ____) (page/pages) (Insert Page Number(s)). (No or number) comments were received in response to this notice.

9. No payments or gifts to respondents have been made under this collection of information.

10. We are complying with the provisions of 38 U. S. C.5701 and the Privacy Act of 1974, and 5 U. S. C. 522a. The records are maintained in the appropriate Privacy System of Records identified "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended 75 FR 22187 (April 27, 2010).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

List as sub-items (a, b, c, d, e, etc.):

a. Number of Respondents: 104,440

b. Frequency of Response: one time

c. Annual Burden Hours: 104,440

d. Estimated Completion Time: 60 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 \$2,506,560. (104,440 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 \$5,441,062

(GS-9/5 @ \$28.04 x 104,440 x 70/60 minutes = \$3,416,580)
(GS-5/5 @ \$18.50 x 104,440 x 35/60 minutes = \$1,127,082)
(GS-3/5 @ \$14.73 x 104,440 x 35/60 minutes = \$ 897,400)

b. Printing and production cost \$5,222

c. Total cost to government \$5,446,284

15. There is no change in the reporting burden. Updates are being made to assure the form is in compliance with the Defense of Marriage Act.

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

8. The Department notice was published in the Federal Register on (Insert Date) (Volume___, No. ___) (page/pages) (Insert Page Number(s)). (No or number) comments were received in response to this notice.

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.