

Supporting Statement for VA Form 21-686c
Declaration of Status of Dependents
(2900-0043)

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 survivors. 38 U.S.C. 1115 provides that an additional allowance for dependents may be payable to certain veterans and surviving spouses who are entitled to compensation and/or pension benefits. Regulatory authority is found in 38 CFR 3.205 and 3.209. Information is requested by this form under the authority of 38 U.S.C. 501 (a).

VA is revising this form to alleviate additional development when establishing a relationship between the Veteran's spouse and stepchild and to add the expiration date placeholder.

2. VA Form 21-686c is used to obtain current information about marital status and dependent child(ren). The information is needed to determine the correct rate of payment for veterans and beneficiaries who are entitled to an additional allowance for dependents.

3. VA Form 21-686c is available as a fillable form on the VBA website for downloading by claimants. Claimants may print and submit applications non-electronically. VA Form 21-686c is also available in Veterans Online Applications (VONAPP). VONAPP allows applicants to view, print, and submit applications electronically to VBA. No data is available yet as to percentage of VA Forms 21-686c which will be received electronically.

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. The VA compensation and pension programs require current information about marital status and dependent child(ren) in order to determine eligibility for additional benefits for dependents. Without this information, entitlement to these benefits could not be determined.

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 Number 78, Volume 167, on August 28, 2013, page 53194. Outside consultations were not solicited as no major changes are being made to the form. Field stations have not reported any difficulty

on the part of respondents in using the form. VA received one comment supporting its use of this form as means to establish dependency status. VA responded in kind to the respondent's support of this form.

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 "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 at 77 FR 42593 (July 19, 2012).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 226,000 per year.

b. Frequency of Response is one time for most beneficiaries.

c. Annual burden is 56,500 hours.

d. The estimated completion time of 15 minutes is based on review by staff personnel and previous usage of this form.

e. The total estimated cost to respondents is \$847,500 (56,500 hours x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$5,562,733

(GS-9/5 @ \$28.04 x 226,000 x 25/60 minutes = \$2,640,433)

(GS-5/5 @ \$18.50 x 226,000 x 30/60 minutes = \$2,090,055)

(GS-3/5 @ \$14.73 x 226,000 x 15/60 minutes = \$ 832,245)

b. Printing and production cost \$20,340

c. Total cost to government \$ 5,583,073

15. There is no change in the reporting burden. The expiration date placeholder has been added to the form.

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

17. The collection instrument, VA Form 21-686c, may be reproduced and/or stocked by the respondents and veterans service organizations. This form is submitted to OMB every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collecting, processing and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 21-686c.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

1. The Veterans Benefits Administration does not collect information employing statistical methods.