Supporting Statement for:

(2900-0747)

VA Form 21-526EZ	Application for Disability Compensation and Related Compensation
	Benefits

A. Justification

 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. VBA expanded the program to all 57 regional offices under the title "Fully Developed Claim Program."

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 Forms 21-526EZ.

VA Form 21-526EZ, *Application for Disability Compensation and Related Compensation Benefits*, is modified to add the following data collections:

- Section I:
 - O Homeless, insert after question 6; VA File number
 - O Component/Branch of Service, insert right after Homeless questions. Item #12B is now redundant, needs to be removed.
 - Forwarding Address Block added an effective date field.
 - O VA Medical Center/Military Treatment Facilities, redesign of Item #12.
- Section II: Item #s 16 & 17, redesigned.
- Section III: Added Item #21, Drill Pay waiver question and instructions
- Section VII: Power of Attorney section added.

VA proposes to remove VA Form 21-527EZ, *Application for Pension*, information collection (IC) from control number 2900-0747 and have it assigned to OMB control number 2900-0002, since it has been transferred to Pension & Fiduciary Service (21P). The only IC attached to 2900-0747 is VA Form 21-526EZ.

This change is necessary to provide VA with the flexibility to modify each form on an individual basis instead of limiting the changes to the original control number. VA needs the maximum flexibility because the content of the form is influenced by a multitude of unpredictable forces outside its control. As such, VA needs to maximize its ability to modify the forms consistent with the form contents' dynamic environment.

- 2. VA Form 21-526EZ is the prescribed form for disability compensation claims, respectively, claimed under the FDC Program. This form is required as part of the FDC Program Transformation Initiative.
- 3. VA Form 21-526EZ 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 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 June 27, 2014, Volume 79, No. 124, page 36584. No comments were received in response to this notice.
 - 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 "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 (June 19, 2009).
- 11. There are no questions of a sensitive nature.
- 12. Estimate of Information Collection Burden.

- a. Number of yearly respondents totals = 34,813 per year:
 - i. 34,813 for VA Form 21-526EZ
- b.Frequency of Response is one time.
- c.Annual burden total = 14,505:
 - i. 14,505 for VA Form 21-526EZ,
- d.The estimated completion time is:
 - i. 25 minutes for VA Form 21-526EZ.
- 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 \$348,120 (14,505 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

\$1,167,104

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- •(GS-11/5@ \$33.92 x 34,813 x 25/60 minutes = \$492,023)
- •(GS-9/5 @ \$28.04 x 34,813 x 25/60 minutes = \$406,731)
- •(GS-5/5 @ \$18.50 x 34,813 x 25/60 minutes = \$268,350)

b.Printing and production cost

\$5,490

c.Total cost to government

\$1,172,594

15. There is a decrease in the reporting burden due to the removal of VA Form 21-527EZ, *Application for Pension*, information collection (IC) from this control number (2900-0747). VA Form 21-527EZ has been assigned to OMB control number 2900-0002, since it has been transferred to Pension & Fiduciary Service (21P). The only IC attached to 2900-0747 is VA Form 21-526EZ.

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, does not change the reporting burden. However, the estimated costs to the federal government have been revised to reflect updated data.

The expiration date place holder has been added to the form.

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 collection of information does not employ statistical methods.