

Supporting Statement for VA Form 21P-535  
Application for Dependency and Indemnity Compensation by Parent(s)  
(Including Accrued Benefits and Death Compensation, When Applicable)  
(2900-0005)

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. 38 U.S.C. 1121 and 1310 provide for payment of Dependency and Indemnity Compensation (DIC) or death compensation to parents of veterans whose deaths are service connected. Parents must also meet income limitations for DIC and death compensation. 38 U.S.C. 5121 provides for payment of accrued benefits. Information is requested by this form under the authority of 38 U.S.C. 501(a)(2). The form prefix has been changed to 21P due to a change in business line responsibilities from Compensation Service (21) to Pension and Fiduciary Service (21P).

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 21P-535.

2. VA Form 21P-535 is used for the sole purpose of gathering the necessary information to determine a parent's eligibility, dependency and income, as applicable, for the death benefit sought.
3. VA Form 21P-535 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. The VA compensation and pension programs require claimants to file an application for benefits subsequent to the death of the veteran to determine eligibility for the benefit. Without this information, entitlement to 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 proposed rule, RIN 2900-AO81, *Standard Claims and Appeals Forms*, in the Federal Register on October 31, 2013, 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 is estimated at 1,783 per year.
- b. Frequency of Response is one time for most beneficiaries.
- c. Annual burden is 2,140 hours.
- d. The estimated completion time is 72 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 \$51,360 (2,140 burden hours x \$24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

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|---|------------|
| a. Processing/Analyzing costs                       | \$146,990  |
| (GS-12/5 @ \$40.66 x 1,783 x 72/60 minutes =        | \$ 86,996) |
| (GS- 9/5 @ \$28.04 x 1,783 x 72/60 minutes =        | \$ 59,994) |
| b. Printing and production cost (\$90 per thousand) | \$1,633    |
| c. Total cost to government                         | \$149,623  |

15. The respondent burden has decreased due to the Final Rulemaking (NPRM) 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 21P-535. Currently, other than for the initial original claim, VA does not require that claimants submit any subsequent claim on a prescribed VA form. Although there is no substantive change in this form, VA expects a change in the number of respondents submitting VA Form 21P-535 due to VA's electronic claims processing system which will use another form, i.e., VA Form 21P-534EZ, that contains the 38 U.S.C. 5103 notices to claimants. VA also expects that more respondents will be filing death benefit claims by parents in the fully developed claim program which requires the use of VA Form 21P-534EZ. The total estimated costs to respondents and to the federal government have changed as shown in paragraphs 12 and 14 of this statement. The expiration date placeholder 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 data collection does not employ statistical methods.