

Supporting Statement for:

VA Form 21P-527, Income-Net Worth and Employment (2900-0002) and
VA Form 21-527EZ, Application for Pension Benefits (formerly 2900-0747)

A. Justification

1. VA Form 21P-527

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 21P-527 will become the prescribed form for disability pension claims. The particular nature of the change made to this form is to remove the requirement to fill out a VA Form 21-526 if it is an original application for pension.

VA Form 21P-527EZ

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. Public Law 110-389, Section 221 (a) required that VBA carry out the pilot study "Expedited Treatment of Fully Developed Claims" for a period of one-year. Based on data collected from the pilot VBA has created a modified version program and expanded it to all 57 regional offices under the title "Fully Developed Claim Program."

VA proposes to remove VA Form 21-527EZ, *Application for Pension* from OMB control number 2900-0747 and have it assigned to OMB control number 2900-0002 since the form has been transferred to Pension & Fiduciary Service (21P). Also, due to the change in business lines, we are changing the form prefix to 21P.

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.

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-527 and 21P-527EZ.

2. VA Form 21P-527EZ, Application for Pension, is the prescribed form for disability pension claims, respectively, claimed under the FDC Program. This form is required as part of the FDC Program Transformation Initiative. VA Form 21P-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. This form is used to reopen a previous terminated pension award and veteran is requesting his benefits be reinstated.
3. VA Form 21P-527EZ and VA Form 21P-527 are 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 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 "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 = 118,197:
 - i. 101,086 for VA Form 21P-527EZ
 - ii. 17,111 for VA Form 21P-527
- b. Frequency of Response is one time.
- c. Annual Burden total = 59,230:
 - i. 42,119 for VA Form 21P-527EZ
 - ii. 17,111 for VA Form 21P-527
- d. Estimated completion time is:
 - i. 25 minutes for VA Form 21P-527EZ
 - ii. 60 minutes for VA Form 21P-527
- 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 \$1,421,520 (59,230 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 \$4,437,436

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- (GS-11/5 @ \$33.92 x 101,086 x 25/60 minutes = \$1,428,821)
- (GS-9/5 @ \$28.04 x 101,086 x 25/60 minutes = \$1,181,021)
- (GS-5/5 @ \$18.50 x 101,086 x 25/60 minutes = \$ 779,204)

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- (GS-9/5 @ \$28.04 x 17,111 x 60/60 minutes = \$479,792)
- (GS-5/5 @ \$18.50 x 17,111 x 60/60 minutes = \$316,553)
- (GS-3/5 @ \$14.73 x 17,111 x 60/60 minutes = \$252,045)

b. Forms are available on the VA inter/intranet forms websites.

c. Printing and production cost (\$90/thousand) \$49,304

d. Total cost to government \$4,486,740

15. There is a decrease in the respondent burden due to 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. VA is codifying its regulations to standardize the use of all VA forms, to include VA Form 21P-527 and VA Form 21P-527EZ. 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 Forms 21P-527 due to VA's electronic claims processing system which will use another form, i.e., VA Form 21P-527EZ that contains the 38 U.S.C. 5103 notices to claimants. VA also expects that more respondents will be filing pension claims in the fully developed claim program which requires the use of VA Form 21P-527EZ. 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 placeholders have been added to the forms.

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.